

**City of Westminster
Local Development Framework**

Core Strategy Issues and Options

Initial Sustainability Appraisal

August 2007

1. Introduction

- 1.1 This report together with its associated tables is an initial sustainability appraisal of the issues and options for the City of Westminster Local Development Framework (LDF) Core Strategy.

Westminster's Local Development Framework

- 1.2 Westminster City Council is drawing up a new plan to guide future development in Westminster. The new plan is called the Local Development Framework (LDF). It will be made up of a portfolio of planning documents that together will set out the planning policies for Westminster. The most important of these is the Core Strategy. This will contain the overall planning vision and strategic policies for the City. The other planning documents will flow from it, and will contain more detailed policies and proposals to implement its strategy.
- 1.3 The Core Strategy will contain the Council's long term vision, looking forward 10-15 years to 2025 and reflecting the objectives of the City Plan.
- 1.4 The current development plan for Westminster is the Unitary Development Plan (UDP). It was adopted in January 2007 and will remain in force until it is superseded by the Core Strategy and other documents comprising the LDF. Preparing the LDF is an opportunity to review the UDP, carrying forward those policies that have worked well and revising those areas that need updating.
- 1.5 Before drafting the Core Strategy the City Council is seeking views on the main planning issues that the plan needs to address. The City Council has set out in the discussion document 'Core Strategy – Issues and Options, May 2007' what it sees as the principal issues facing Westminster, and has included a range of alternative policy options to deal with them. Consultation on this document is taking place throughout June and July 2007.

2. Sustainability Appraisal

- 2.1 It is important for the City Council (as well as a statutory requirement) that future change and development minimises harm to the environment. The City Council has assessed each of the alternative policy options for their likely economic, environmental and social effects and their consequential impact on the achievement of sustainable development. This will help to ensure that the planning policies which are included in the Core Strategy help to achieve the aim of sustainable development. The City Council will also carry out an assessment of all realistic options put forward by others during the course of public consultation.

- 2.2 The new LDF planning system has been put in place by the Planning and Compulsory Purchase Act 2004. This Act requires that Development Plan Documents and Supplementary Planning Documents are subjected to sustainability appraisal incorporating Strategic Environmental Assessment (SEA).
- 2.3 This sustainability appraisal incorporates the requirements of Planning Policy Statement 12 (PPS 12) and the SEA Directive, and is based on the methodology set out in the ODPM document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents'(November 2005).
- 2.4 This SA process is integrated into the planning system to ensure that the results of the appraisal influence the choice of policy options as they emerge. The first stage in the Sustainability Appraisal process was the production of a Scoping Report. The Scoping Report sets out the context and baseline information in order to provide a starting point from which to appraise the effects of implementing the Local Development Framework. To provide a sound base for analysis the report identifies relevant plans and strategies, programmes, key sustainability issues and problems, and sets out a detailed Sustainability Framework through which the appraisal can take place. Westminster's Draft Sustainability Appraisal Scoping Report was made available for consultation in April 2007. It can be downloaded from the City Council's website.

Approach

- 2.5 An evaluation of the 17 sub-options (1A-D, 2A-C, 3A-C, 4A-B, 5A-B and 6A-C) already identified in the Core Strategy Issues and Options document, May 2007, has been carried out against the draft SA framework explained in the Scoping Report. A set of tables show the predicted effects of each option together with a brief narrative. This methodology meets the requirements set out in paragraph 2.3 above.

Next stages

- 2.6 Following consultation on the issues and options for the Core Strategy and on this associated Initial Sustainability Appraisal, a set of preferred options for the Core Strategy will be developed during the autumn 2007 and published for further public comment. The preferred options will take account of the sustainability objectives listed overleaf.
- 2.7 During this process the Sustainability Appraisal framework (SA) will be refined, taking account of the results of the consultation on the draft initial Sustainability Appraisal Scoping Report as well as the responses from the consultation on the Issues and Options document. The revised SA Framework will be used to complete a second round sustainability appraisal of the preferred issues and options. The results

will be presented in a final SA report which will be available for consultation as part of the statutory consultation on the preferred options stage.

The sustainability issues

- 2.8 The initial sustainability issues identified in the Scoping Report are (in summary form) :
- Increasing pressure on the natural and built environment – air quality, open space, biodiversity, historic buildings and sites
 - Waste and recycling
 - Road transport and congestion and need for better provision for pedestrians and cyclists
 - Noise and its impact upon human health
 - Climate change; climate change adaptation
 - Sustainable building policies
 - Supply of appropriate housing type and tenure
 - The creation of sustainable, cohesive and inclusive communities
 - Maintaining economic diversity and improve local opportunities

The sustainability objectives

- 2.9 The 17 sustainability objectives identified in the Scoping Report, against which the issues and options are assessed, are:
1. To create cohesive, inclusive and safe communities with appropriate levels of social and community facilities
 2. To reduce the fear of crime and actual crime
 3. To ensure the provision of appropriate housing types to reduce homelessness; reduce overcrowded households and meet the demand for affordable housing and family-sized units
 4. To promote and improve health and well-being
 5. To reduce greenhouse gas emissions and support climate change adaptation
 6. To require the application of sustainable design and construction in all new developments and refurbishment of existing buildings.
 7. To a) minimise flood risk and promote sustainable urban drainage and b) protect surface and ground water quality
 8. To protect, enhance and create environments that encourage and support biodiversity
 9. To improve air quality
 10. To reduce noise and the impact of noise
 11. To reduce the need to travel; the use of private motorised vehicular transport, as well as encourage walking, cycling and the use of public transport
 12. To reduce waste production and increase recycling, recovery and re-use of all waste
 13. To protect and enhance the historic environment and architectural, archaeological and cultural heritage
 14. To enhance the public realm and street environment

15. To protect, enhance, and seek opportunities to increase, open space throughout the City
16. To ensure equality of opportunity and improve opportunities for education, training and employment
17. To maintain economic diversity, increase local opportunity and support sustainable economic growth

Each of the policy options has been appraised against each of the 17 sustainability indicators, tabled 1 to 17 in a central column in the tables appended. The results are expressed simply:

- + denotes a broadly positive effect
- denotes a broadly negative effect
- = denotes an uncertain effect, or perhaps a combination of positive and negative effects
- =/+ uncertain, but perhaps becoming more positive over time

These are intended to be indicative only of possible overall cumulative effects of a given policy option. Following consideration of the results aggregated, an overall “score” is given in the three boxes labelled economic, social and environmental beneath the narrative. Again, these results represent a broad indication only.

3. Conclusions

- 3.1 The scale of the issues and opportunities facing Westminster is enormous. The sustainability appraisal shows that there are unavoidable tensions between policy objectives and sustainability objectives. It will be impossible to avoid negative environmental impacts under conditions of growth and development. However, measures can be taken to reduce the impacts by ensuring that development is more environmentally sustainable than that being replaced; that new development achieves an excellent BREEAM standard; incorporates renewable energy wherever practicable and minimises carbon emissions.
- 3.2 Air pollution, particularly PM10 and NOx, remains a very serious environmental issue in Westminster, where the highest levels of air pollutants are recorded anywhere in the UK. Any net increase in private motor vehicles as a result of additional growth in development will exacerbate the situation.
- 3.3 Residential densities are amongst the highest in the country, and open spaces are needed locally, especially for children and the elderly, and are essential for respite from the bustle of the city. Additional development at higher densities will exacerbate this situation as well as affect the City Council's ability to achieve its targets in the City Plan. The initial sustainability appraisal demonstrates that for options that involve more development, higher densities and increased activities, whether relating to housing, workplaces, retail or hotels, they are assessed negatively, not only against the environmental baseline but also against the social baseline, because of for example, lack of adequate infrastructure and additional pressures on existing public services and facilities.
- 3.4 A final sustainability appraisal will be carried out at the Preferred Options stage.