

Metropolitan Views Supplementary Planning Document

Statutory Documents to Accompany SPD

- 1. Statement of SPD Matters**
- 2. Consultation Statement**
- 3. Sustainability Appraisal**
- 4. Statement of adoption**

December 2007



City of Westminster

Metropolitan Views: Notice of Supplementary Planning Document Matters

Title Metropolitan views In Westminster
Purpose To identify significant views in Westminster and provide detailed guidance, concerning their protection and enhancement.
Content This will include <ul style="list-style-type: none">[a] a definition of what constitutes a metropolitan and local view(b) a list of those view considered to be of metropolitan importance within the City of Westminster(c) an explanation of the significance of each view(d) potential threats or opportunities to enhance each view
Geographical coverage Will apply to the whole of the City of Westminster.
Consultation The full public consultation will run from 1 December 2007-25 January 2008. During this time, the draft audit can be downloaded from the internet or inspected at One Stop Services, 62 Victoria Street, SW1 (Open 8.30am-7pm, Monday-Friday; 9am-1pm Saturday).
Representations Representations on the draft SPD must be submitted in writing by 25 January 2008. Written representations should be made by post to the following address: Conservation Area Audits Team Department of Planning and City Development 12th Floor (South) Westminster City Council City Hall 64 Victoria Street SW1E 6QP Or by e-mail to: conservationareaaudits@westminster.gov.uk Any representations may be accompanied by a request to be notified in future, at a specified address, of the adoption of the SPD.

Metropolitan Views SPD: Statement of Consultation

Under Section 17(b) of the Town & Country Planning (Local Development) (England) Regulations 2004, Westminster City Council has a duty to prepare a consultation statement to accompany the draft Metropolitan Views Supplementary Planning Document (SPD). Consultation on all SPD follow procedures set out in Westminster's adopted 'Statement of Community Involvement' (January 2007). Main steps undertaken are set out below.

Pre-drafting consultation

A phase of pre-drafting consultation was undertaken prior to the initial drafting of the document. The programme for 2007/8 was made available on council's website (www.westminster.gov.uk). Residents and Amenity Societies have been consulted via the Area Forums, and a lunch was held with members of WPOA to explain the background to the document.

In addition, letters inviting comments prior to drafting were sent to local and national amenity societies, Westminster Property Owners' Association (WPOA), local businesses, housing associations, and English Heritage. Main comments received as a result of the pre-drafting consultation are set out below:

Respondent	Comments	Council Response
English Heritage	<p>Identified a number of views considered to be of importance, these included:</p> <ul style="list-style-type: none"> • Piccadilly Circus to the Palace of Westminster • Trafalgar Square/ Whitehall to the Palace of Westminster • Horseguards Avenue • Parliament Square to County Hall • Lambeth Palace/ Bridge Gardens to the Palace of Westminster <p>There are a number of other views which may of interest but within the context of UDP policy DES15 it is not clear whether they would be considered as Metropolitan or local views. The emerging SPD provides an opportunity to make this distinction clear.</p> <ul style="list-style-type: none"> • Whitehall to the National Gallery • North end of St James Street looking towards St James Palace • Kingsway to Bush House • Oxford Circus to Langham Place • Langham Place/ Portland place to Regents Park • Constitution Hill to Wellington Arch • The Mall looking to Wellington Arch • The Mall looking towards Admiralty Arch • Pall Mall to the National Gallery • Strand towards St Mary le Strand • Along the Victoria Embankment southwards towards the Palace of Westminster • Piccadilly Circus towards the Quadrant/ Regent Street and Piccadilly 	<p>Most suggestions are identified as metropolitan views. All to be reviewed during consultation process. Views of Horseguards Avenue identified as local view in Whitehall Conservation Area Audit.</p> <p>Criteria for selection of views have been identified in the introductory section of the SPD.</p> <p>Met View (V31) Met View (V4)</p> <p>Local View</p> <p>Met View (V) Local View (Harley street Audit)</p> <p>Met View (V8)</p> <p>Met View (V7)</p> <p>Met View (V20) Met view (V18) Met Views V16/17</p> <p>Met view (V27/ V30)</p>

	<p>In addition there are a number of key landmark buildings which are of metropolitan importance and therefore could be the subject of metropolitan views, for example Centrepoint, BT Tower and the London Eye.</p> <p>This list is a suggestion and based upon instinct and knowledge of what elements of Westminster help define its character as a City. We would suggest a more rigorous process needs to be undertaken to help define and understand the character of each view. This in turn could help set parameters for acceptable change without compromise.</p>	
Westminster Property Owners Association	<p>This is clearly a complex subject in terms of which views should be identified how they should be assessed; and what are the criteria against which the effects are to be judged? The complexity of this is well shown in the debate which has arisen concerning approach and methodologies associated with the Mayor's View Management Framework.</p>	<p>Agree this is a complex subject. Further to comments working lunch was held with presentation to clarify Westminster's approach to the emerging SPD and full consultation on proposed views will follow.</p>
The Westminster Society	<p>We note that the consultation does not involve local views; whilst we accept that these are contained within local conservation audits; it would perhaps be useful to have them collated within possibly an annex to the SPD so that consultees can gain more of an overall picture than exists at present. Returning to the main issue, we could perhaps start from the premise of the 27 views of all descriptions that were set out in the Mayor of London's "London Plan" as set out in policies 4B15 and 4B16 insofar as the individual; views affect views to, form and within the City of Westminster. These I would suggest are all six London Panoramas, river prospects F-M, Townscape Views 1 and 4 and the three linear views, a grand total of 19 protected views. We see these views as the basic core of a protected views network.</p> <p>The more significant elements that exist within those views are St Paul's Cathedral and the World Heritage Site at Westminster along with the elements to the front and rear as well as to either side; in this connection we regard the current viewing corridor widths as having reached an absolute minimum. The society considers that other sites that could be placed along side St Paul's and Westminster could include Somerset House and Buckingham Palace a being sites that are of equal landmark importance.</p> <p>The society is concerned that what eventually appears represents a balanced approach that equates the protection and conservation of the historic built environment and its settings-with the demands of a modern world class city; a blanket assertion of opposition to all new tall buildings would not really be a sustainable approach since new structures that frame a landmark building may be appropriate so long a they do not dominate the view or humble the setting of the landmark building.</p>	<p>As not all of the conservation area audits have been completed, we can only include an incomplete list of local views. However, we will provide photocopies of maps of local views from completed conservation area audits with the consultation draft to help inform comments. The Mayor of London views are mentioned in the document but generally these are more strategic London views and metropolitan views are of more local importance.</p> <p>Tried to avoid too much overlap with the Mayor's document. However, suggested views such as those of Somerset House and Buckingham Palace are included within the document.</p> <p>The document seeks to avoid any blanket opposition to new development by assessing individual views and what is important within these.</p>
Westbourne Neighbourhood Association	<p>Thank you for inviting us to submit comments on protection of views.</p> <p>The area contained within our amenity society is quite small, mostly a network of residential streets. We try to preserve the scale of the townscape by objecting to what as we see as intrusive buildings which go well beyond the existing rooflines and are overly bulky.</p> <p>At the confluence of the 5- way junction on Chepstow Road/Westbourne Grove there is a series</p>	<p>Agree this is important but to be identified as a</p>

	of vistas providing long views and we think these would be worth protecting. Any element of spaciousness in an urban environment is to be welcomed.	local rather than metropolitan view
Paddington Waterways and Maida Vale Society	<p>To our mind there are only two Metropolitan Views as you define them within our area: From the top of the basin (Edgware Road End) with St Mary's Hospital on one's left and new development on one's right looking towards Paddington basin:</p> <ul style="list-style-type: none"> a) biggest expanse of inland waterway wharfage area in the country b) contrast between modern buildings and 19th century warehouses c) historic value <p>From halfway up Aberdeen Place (above the canal) looking southwest along the line of the canal</p> <ul style="list-style-type: none"> a) the only natural vantage point giving views from above the level of the canal looking down over the canal b) juxtaposition of trees, water and stucco fronted buildings and canal boats <p>rest of letter provided examples of local views, which has been added to the file for the conservation area audit</p>	These are less widely recognised views and have not therefore been identified as metropolitan views. However, this will be reviewed during the consultation process.
Verina Glaessner, The St Marylebone Society	<p>Thank you for inviting comment on this subject: 1 Views in Westminster which should be protected metropolitan views 2 Reasons for their significance 3 How these views could be better protected</p> <p>Sensible guide-lines on this are already part of Westminster City Council's Policy – so put it into practice. Westminster City Council's Unitary Development Plan and its various follow-on documents contain a sensible list of protected views of historic buildings which are synonymous with the city's identity. They also contain sensible guide-lines regarding the setting of these buildings many of which are also protected by World Monument status. These policy documents strongly imply that the overshadowing or eruption into the sky-line behind or along side these buildings constitutes an interference with their setting. Contrary to the special pleading of The London Plan, there is no way that the appearance of an over-large intrusion of tall buildings of whatever design can ever be anything other than deleterious by definition. Westminster City Council should put its stated policies into effect.</p> <p>It is worth remembering that while a distinction can be made between 'well-known landmark buildings, of the Royal Parks and of the river' and less well-known buildings, the well-known buildings which are landmark buildings are also local to those who live and work in their vicinity.</p> <p>Example – Trafalgar Square. The architectural and town planning effect of Trafalgar Square depends on the intricate proportional relationship of a diverse series of buildings in a similar scale to the open area of the square. The intrusion of tall buildings into the background space – tiered or not will inevitably detract from the existing proportions of this vital and historic square. Where from all available view points the roofline silhouette of a building is visible against a horizon uninterrupted by a building line beyond, this should be protected.</p> <p>Views into and out of historic parks The views into and out of historic parkland such as Regent's Park, The Green Park and St. James's</p>	<p>A list of metropolitan views does not exist at present and this is what will be provided in the SPD. The SPD should help to make policy in the UDP more clear.</p> <p>Agree, the SPD will make reference to recognising landmarks are significant in different ways to different viewers.</p> <p>Various views of Trafalgar Square identified in document.</p>

	<p>Park. These are spaces again, which are synonymous with London's identity, and whose individual identities are as parks within a formal city space in which domestic and public buildings play an equal role. To create an open space equipped for professional sport, for instance, with all that that implies, surrounded by a pallisade of buildings whose scale and massing appear aggressive and fortress-like and which rise above the tree-line, is to fail to protect or enhance the park concerned. Again encircling the Royal Parks with buildings that loom above the tree-line must be seen as an infringement of that parks' historic space.</p> <p>Spires and minarets The spires of churches including indeed the minaret of Regent's Park's mosque, and the towers of public buildings provide visual interest to local views both from street level and from the homes and offices surrounding them. They need to stand free and be protected from over-shadowing by office or residential blocks against whose bulk and scale they would be lost.</p> <p>Local view example: The ensemble of Council House and Library buildings on Marylebone Road were both designed to complement not dominate the terrace of Georgian houses into which they were originally inserted. The tower on the Council House is an especially fine example of early 20th century classicism, picking up as it does on Soane's Holy Trinity spire further to the east. It is a tribute to Westminster Council's good offices that only the south view of the tower – designed to capture full sunlight and be seen against an open sky - has been compromised. Further encroachment must be prevented.</p> <p>Visual access for all – most especially to public buildings Retaining the sense of place, of a specific and various history through protecting every citizen's right of visual access to those buildings and spaces which embody London's past is neither elitist nor exclusive. This is especially so in a rambling, diverse and densely populated city like London in which a sense of place and of ownership of that place is easily lost. Permitting public buildings, and most especially historically important public buildings, to occupy their own allocated visual space allows that vista, those buildings and their past to be 'owned' by all who pass by or who live within their shadow.</p> <p>Canal views and views of the Thames Canal views and views of the Thames are equally important, lending variety, a sense of place and peace to cityscapes which are often polluted, anonymous, busy and traffic-filled. These views should not be allowed to be monopolised by the occupants of single buildings but should remain open and available to all. It would be good to see Westminster supporting moves to open street level views which have been lost where this is possible.</p> <p>How to better protect significant views Alternatives to intrusive constructions Environmental arguments and arguments about density being achievable within smaller scale buildings which do not, by definition, raise issues concerning local or metropolitan views, have been ably made by Gordon Chard . It is disappointing then, to find Westminster City Council bowing to pressure to act counter to their own policies which have been consulted upon widely and espoused publicly. A tower building at Victoria for instance, given its location, cannot but be visually intrusive</p>	<p>Agree. The description of Royal Parks views seeks to emphasise this special character as green open spaces.</p> <p>Agree. Most to be identified as local views in conservation area audits.</p> <p>Agree. Have sought to identify views that are from publicly accessible viewpoints.</p>
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	<p>over a wide distance, ditto buildings which impinge upon Hyde Park and Kensington Gardens and Regent's Park.</p> <p>All too often the intrusion of an over-scale building in to the sky-line of an important building, ensemble of buildings, park or square is taken as legitimating further intrusive development. Probably the most productive step the City Council could take would be to refuse in practice, rather than just on paper, to allow further intrusions.</p> <p>Westminster City Council is one of a minority of London city councils which has a more than a metropolitan responsibility. This should be given full weight by The Mayor and The London Plan, Government and indeed by Westminster City Council itself. Its national responsibilities and strategic importance should be taken more seriously. These cannot be sensibly reduced to mere selling points for major developments. Such an attitude would indicate a failure to take into account 'the strategic London importance' (The London Plan Policy 4B10 and 11.) of the assets to be found within The City of Westminster. There may well be other less sensitive parts of London which could benefit from careful redevelopment on a scale which is simply inappropriate for Westminster. Those businesses and government departments which wish to be housed within its boundaries should be expected to acknowledge the particular constraints and benefits of their location. Such acknowledgement would be to the benefit of all Londoners.</p>	<p>Agree. large number of river views have been identified. Canal views are mostly identified within conservation area audits, but will be reviewed as part of the consultation process.</p> <p>Agree that much of Westminster is not suitable location for tall buildings. Document seeks to identify specifically where there are important views sensitive to high buildings.</p>
<p>Micheal Sharman</p>	<p>Westminster should protect the following Metropolitan views:</p> <ul style="list-style-type: none"> • Marylebone Parish Church seen from York bridge • St Mary's Church Wyndham Place seen from Wyndham, Place and Bryanston Square • St Johns Wood Parish Church seen from Park Road • Views from footbridge across lake in St James Park • Duke of York's Monument and beyond Piccadilly Circus • Regent Street Curve from Piccadilly Circus to Vigo Street • The Holme, Regent's Park across the lake • Whitehall and Big Ben from the National Gallery steps • Buckingham Place to and from Admiralty Arch • Courtyard of Somerset House • Somerset House form the Thames • Streetscape around St Mary le Strand • Westminster School Playing Fields from Vincent Square • Westminster Cathedral from within Ashley 	<p>Most of these views have been identified within the document. Others will be identified as local views in conservation area audits.</p>

	Gardens	
C Seymour Newton, The Knightsbridge Association	<p>Thank you for the letter from Gordon Chard dated 18th December in which you invite suggestions for inclusion in a list of Metropolitan Views which form part of a SPG now in preparation. We discussed this at our Committee meeting last night and would suggest the following:=-</p> <p>a) The north bank of the Thames from Westminster to Temple</p> <p>b) The view from the top of Wellington Arch in Hyde Park Corner.</p> <p>More important is the matter of the views out of Hyde Park and other Royal Parks in Westminster. At present the UDP states:- <i>Permission will not be granted for development that will harm the views into or out of the Royal Parks (ENV13a(A)).</i> <i>Buildings adjacent to open spaces should not project above existing tree or building lines (DES12(A)4).</i></p> <p>We believe that the Guide should be more specific especially as there is now pressure for more high rise buildings in Knightsbridge. Though the tree line is important as part of the foreground when looking out of the Park, it is the height of the proposed building in relation to other buildings in the street that is really important. For example, the four blocks of varying height which form part of the Bowater House development relate to the Knightsbridge streetscape, not to the tree line.</p> <p>The Kensington & Chelsea UDP is relevant; it states:- <i>New buildings and extensions to existing buildings in the Royal Borough, which can be seen from Kensington Gardens or Hyde Park, To be designed so as not to exceed the general height of buildings, excluding post war blocks, and to pay regard to the tree lines.</i></p>	Have been identified as Metropolitan Views.
The Thorney Island Society	<p>St James Street and St James Palace-as seen from Piccadilly</p> <p>The Mall towards Buckingham Palace</p> <p>3 Queen Anne's Gate/ Lewisham Street to Big Ben</p> <p>Victoria Street towards Victoria Station</p> <p>Victoria Street towards Parliament Square</p>	<p>Identified as Metropolitan View</p> <p>Identified as Metropolitan View</p> <p>Identified as Local View (Birdcage Walk Audit)</p> <p>Identified as Local View</p> <p>Identified as Local View (Broadway and Christchurch Gardens Audit)</p>
Land Securities	<p>The issues of views in London are a very complex matter. There is a lot of guidance already available on the issue and we strongly feel that another SPD is unnecessary and will only serve to complicate matters further, creating more uncertainty and delays for developments.</p> <p>The Greater London Authority is close to adopting its London View Management Framework which will be a comprehensive document covering important views across the capital including London Panoramas, Linear Views, Rover Prospects and Townscape Views. In addition to this, the Westminster's UDP deals specifically with local views, including views from Royal Parks, London Squares, Conservation Areas etc which we firmly believe in an effective policy basis for assessing development proposals. We do not believe that any other guidance is necessary. We understand that WPOA has written to you requesting a full debate on this issue and if you are to progress with the preparation of an SPD, we would fully concur with WPOA's suggestion and very much welcome being involved in any such debate.</p>	SPD is required due to changing policy framework and inspectors comments at Inquiry. Document designed to be a useful tool to help clarify Westminster's policies on views, both local and metropolitan.

Margaret Hull 46a Churton Street	Mix of historic landscapes and river and trees contribute to Westminster's Skyline. Poor quality alterations to existing buildings and tall buildings in the backdrop are the main threats to Westminster's skyline	Agree reference to historic landscapes and trees included throughout the SPD
Many Maxwell 23A Vincent House	Tall buildings are the biggest threat to Westminster's skyline	The SPD should help to clarify where tall buildings will affect significant views and guide future development to ensure any tall buildings are sympathetically located.
Christopher Nicholas	Considers both historic landmarks and new buildings contribute to Westminster's skyline. Clutter and poor landscaping poses the biggest threat.	Agree. Issues of clutter and poor landscaping raised within SPD
Miss P Varrakalion	Feels that the statue of Boadicea looking towards the London Eye should be included as a Metropolitan view	A view has been included of the river prospect at this point, although Boadicea does not form the focal point as the wider river prospect is considered to be the most important aspect of the view

The next stage involves a full programme of public consultation on the draft, involving the GLA, local and national amenity societies, WPOA, local trade associations, ward members and other stakeholders. This statement will be reviewed and updated following full consultation.

Once adopted, the finalised SPD (plus Statement of Adoption and Statement of Consultation) will be made available to download from the council website with hard copies available at OneStop Services and from the Conservation Area Audits Team. Notification will also be sent to all consultees.

Sustainability Appraisal Report For the Metropolitan Views SPD

December 2007

Contents

Section No.	Section	Page No.
1	Non-Technical Summary	
2	Appraisal Methodology	
3	Background	
4	Sustainability Objectives, Baseline and Context	
	Relevant plans, programmes and scope	
	Sustainability Objectives	
	Sustainability Appraisal framework and testing the plan objectives	
5	Plan Issues and Options	
	Main Options considered and comparison	
6	Significant social, economic and environmental effects	
	Time Scale and reversibility	
7	Implementation and Monitoring	
	The Next Step	
	Conclusion	
	Appendices	
Figure No.	Figure	
Table 1	Links between SA and SEA development	
Table 2	List of Plans and Strategies Reviewed	
Table 3	Sustainability Issues	
Table 4	SA Objectives	
Figure 1	Matrix of Sustainability Issues	
Table 5	listing SA/SEA objective and their link to SEA Directive protection objectives	
Table 6	Explanation of conflicting Objectives	

Appendices

- Appendix 1: Consultees
- Appendix 2: List of Plans and Strategies
- Appendix 3: Sustainability Appraisal Objectives
- Appendix 4: Appraisal of Strategic Options
- Appendix 5: Summary of Impacts
- Appendix 6: Timescale and Reversibility

1. Non-technical Summary

Purpose and methodology

The purpose of Sustainability Appraisal (SA) is to promote sustainable development by considering social, economic and environmental issues when preparing planning policy documents. This SA considers the draft Metropolitan Views Supplementary Planning Document (SPD) from a social, economic and environmental perspective, by assessing different options and the draft SPD against available baseline data.

The preparation of the SA for the Metropolitan Views SPD has involved two key stages, namely:

1. A Scoping Report, setting out what the scope of the Sustainability Appraisal would be, was prepared and issued for consultation in September 2007.
2. The production of the final Sustainability Appraisal Report, which follows this non-technical summary.

The Scoping Report identified the key sustainability issues for the Metropolitan Views SPD, which included:

- Increasing pressure on the natural and built environment;
- Need to promote sustainable building policies and practice
- Maintaining economic diversity and increasing local opportunity.

This led to 17 '**Sustainability Objectives**' being formulated, which were used to describe sustainability effects. These include issues such as improving health and well-being and reducing fear of crime and can be found in Section 4 of the main report.

Appraisal of Options

Options (included in Section 5 of the main report) were formulated using key sustainability issues, along with a careful assessment of issues raised by the public, other stakeholders and technical advice,. The options assessed were:

Option 1: Prepare the Metropolitan views SPD

Option 2: Do Nothing

The key changes and the sustainability strengths and weaknesses of each option were identified and assessed against the 17 sustainability objectives. This concluded that the preferred option was to prepare the SPD on Metropolitan Views.

Statement of Significant Effects and Difference the Process has made

The next stage of the SA attempts to predict the effects of preparing and implementing the SPD. The SA process and the SPD have been initiated to build

upon the policies in the Unitary Development Plan. Generally, the draft SPD performed well against sustainability objectives and the majority of effects identified were positive. However, certain minor negative issues were identified and proposals for mitigation have been identified. These recommendations have been incorporated into the draft SPD.

How to Comment on the Report

Public consultation on the Sustainability Appraisal will run until **25 January 2007**. Comments can be posted, emailed or faxed to the address below:

Conservation Area Audits Department of Planning and City Development Westminster City Hall 64 Victoria Street, London SW1E 6QP	Fax: 020 7641 2338 Email: conservationareaaudit@westminster.gov.uk
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2 Appraisal Methodology Guidance and Limitations

In accordance with Section 39 of the Planning and Compulsory Purchase Act 2004 and the guidance in PPS12, the council has done a Sustainability Appraisal to assess the social, environmental and economic effects resulting from the SPD. The appraisal methodology is based on the approach set out in the Metropolitan Views SPD Scoping report, which was subject to consultation with the statutory consultation agencies in early 2007.

The Sustainability Appraisal Report has been compiled using a number of guidance documents including:

- Policy Planning Statement 12: Local Development Frameworks
- Sustainable Appraisals of Regional Spatial Strategies and Local Development Documents (ODPM, November 2005).

The Audit will be a Supplementary Planning Document and will be a part of the new Local Development Framework suite of documents. The process is set out in Table 1 below.

Table 1: Links between SEA/SA and SPD development

Plan Stage	SA/SEA Stage	Date Undertaken
Pre-production	<p>A. Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>A1. Identify other relevant plans, programmes and sustainability objectives.</p> <p>A2. Collect baseline information</p> <p>A3. Identify sustainability issues</p> <p>A4. Develop the SA framework, consisting of sustainability objectives, indicators and targets</p> <p>A5. Test the SPD objectives against the SA framework</p> <p>A6. Consult on the scope of the SA</p>	January-August 2007
Production	<p>B. Developing and refining options</p> <p>B1. Appraise issues and options</p>	September-November 2007
	<p>C. Appraising the effects of the SPD</p> <p>C1. Predict the effects of the SPD</p> <p>C2. Assess the effects of the SPD</p> <p>C3. Mitigate adverse effects and maximise beneficial effects</p> <p>C4. Develop proposals for monitoring</p>	

	C5. Prepare the SA report	
	D. Consulting on the draft SPD and SA report D1. Consult on the SA report D2. Appraise significant changes D3. Decision making and provision of information	December 2007- January 2008
Monitoring	E. Monitor implementation of the plan E1. Monitor the significant effects of the plan E2. Respond to adverse effects	

Timetable and Responsibility

An SA Scoping Report was produced to set out the initial context and findings of the SA and the proposed approach to the rest of the appraisal. The aim was to ensure that the SA was comprehensive and addressed all issues and objectives by enabling input from key stakeholders and consultation bodies at an early stage of the process. The report also set out the proposed methodology for the SA, giving details of its proposed level of detail and scope.

The Scoping report set out an initial assessment of:

- The relationship between the SPD and other relevant plans and programmes
- Sustainability objectives established at the national, regional and local level.
- The current environmental, social and economic baseline and any trends
- The likely key sustainability issues

The information contained within the Scoping Report forms the backbone of this Sustainability Appraisal. The Sustainability Appraisal was carried out by officers within the Planning and City Development Department.

Who was consulted?

Statutory bodies were consulted on the Scoping Report, with responses received from English Heritage and English Nature. These comments related to baseline indicator information and the document has been re-drafted to reflect these. A wide range of stakeholders were consulted at both pre-production and draft stages. A separate consultation statement summarising all representations received has been prepared.

3 Background

Purpose of Sustainability Appraisal

The Planning & Compulsory Purchase Act 2004 requires that Local

Development Documents, including SPD, are subject to Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA).

The purpose of a Sustainability Appraisal is to assess the social, economic and environmental impacts of plans at a strategic level, in order to ensure that planning decisions are made that accord with the principles of sustainable development. This Sustainability Appraisal has been carried out according to the ODPM guidelines: "Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents."

Background To SPD

The steady and successive development of Westminster since the sixteenth century has resulted in a complex townscape, which includes many of London's most famous buildings and landmarks, open spaces, Royal parks, London Squares and The River Thames. The City Council is keen to protect the many familiar views of its unique townscape and river frontages, whilst encouraging new development where appropriate.

The SPD aims to provide a definition of Metropolitan Views, explain the policy context, and establish the criteria used to select the Metropolitan views. It will explain the significance of each view, and identify key features and potential for enhancement.

The Metropolitan Views SPD supports and enhances a number of policies in the Unitary Development Plan namely; Policy DES 15 Metropolitan and Local Views, Policy DES 3 Tall buildings and Policy Des 12: Parks, Gardens and Squares. They therefore conform with current Westminster planning policy national policy and the London Plan.

Information on the timetable for preparation, consultation and production of these SPD is contained within the Local Development Scheme, which is available on the Westminster website at:

<http://www.westminster.gov.uk/environment/planning/ldf/local-development-scheme.cfm>

Compliance with the SEA Directive

In accordance with the Government's draft guidance on strategic Environmental Assessment (SEA), SAs of SPDs should also fully incorporate the requirements of the European Directive 2001/42/EC, known as the SEA directive. This directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004- the SEA Regulations. Whilst SEA and SA are distinct processes, the intention of this SPD is to adopt an approach to appraisal which also meets the requirements of the SEA directive.

4 Sustainability objectives, baseline and context

Identifying other relevant policies plans programmes & sustainability objectives.

The purpose of reviewing other plans and programmes and sustainability objectives is to ensure that the relationship between this document and the draft SPD has been fully explored. This will, in turn, ensure that Westminster City Council is able to act on any identified inconsistencies between international, national and local objectives.

Table 2 below shows a list of the plans and strategies that were reviewed as part of the SA. A full review of these, which sets out the implications for the SPD, is set out in the Scoping Report and at Appendix 2.

Table 2 The Policy, Plans and Programmes assessed.

International
The Johannesburg Declaration on Sustainable Development
European
Council Directive 79/409/EEC on the conservation of wild birds
Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora
Air Quality Framework Directive 96/62/EC and daughter directives (99/30EC)
European Spatial Development Strategy
National
UK Sustainable Development Strategy – Securing the Future
UK Climate Change Programme
PPS 1 Delivering sustainable development
PPS 6 Planning for Town Centres
PPS 9 Biodiversity and Geographical conservation
PPS 12 Local Development Framework
PPS 22 Renewable energy
PPS23 Planning and pollution control
PPG 4 Industrial, commercial development and small firms
PPG 8 Telecommunications
PPG 13 Transport
PPG 15 Planning and the Historic environment
PPG 16 Archaeology and planning
PPG17 Open Space, sports and recreation
PPG 24 Planning and noise
English Heritage Streets for All
Regional
The London Plan
Mayor's Draft View Management Framework (2005)
Mayor's Biodiversity Action Plan
Local
Unitary Development Plan 2007
Westminster City Council's Community Plan – One City (draft)
'Air Quality Strategy & Action Plan' (2001) and 'Air Quality Strategy & Action Plan: Progress Report' (2005)
Open Space Strategy (draft)
Sustainable Buildings SPG
Economic Development Strategy
Nature Conservation Strategy (1997)
'Biodiversity Action Plan' (2000)
Design Matters in Westminster – Supplementary Planning Guidance on creating good City architecture
Development and Demolition in Conservation Areas
Westminster Way: A Public Realm manual for the City
Inclusive access and Design SPG

The assessment of other PPP's has identified a number of key considerations and synergies, which needs to be taken into account in the formulation of this SPD, which are:

- Consideration of the effects of climate change and the need for a reduction in greenhouse gas emissions.
- The overall protection of the environment and need to reduce levels of environmental pollution.
- The facilitation and promotion of sustainable patterns of urban development and land use; ensuring that development supports and contributes to the creation of safe, accessible, sustainable communities.
- The need to sustain, maintain, restore and enhance biodiversity and environmental resources; accommodating this in new development and recognising links between nature conservation and well-being.
- The promotion of sustainability in new development and existing building stock.
- The endorsement of policies that actively encourage the inclusion of renewable energy in the energy mix – 10% of electricity by 2010 and 20% by 2020.
- The need to meet housing requirements for whole community by providing wider choice, mix, size, type, location and mixed communities.
- The reduction in the need to travel, especially by car.
- The importance of valuing the physical survival of our past as a central part of our cultural heritage.
- Achieving the effective protection of all aspects of the historic environment.
- Ensuring effective preservation of archaeological sites.
- Recognising the importance of open space. This is at a premium and pressure is considerable and will only increase.
- Reduction and management of noise - Development of specific land uses should be guided to appropriate locations.
- Achievement of transport infrastructure integration; redevelopment of major nodal interchanges
- Reduction in waste and promotion of recycling.
- Promotion of economic growth without detrimental impact upon environment.

Table 2: List of plans and Strategies reviewed.

National
PPS 1 Delivering sustainable development
PPS 9 Biodiversity and Geographical conservation
PPS 12 Local Development Framework
PPS 22 Renewable energy
PPS23 Planning and pollution control
PPS25 Development and Flood Risk
PPG 3 Housing
PPG 4 Industrial, commercial development and small firms
PPG 8 Telecommunications
PPG 15 Planning and the Historic environment
PPG 16 Archaeology and planning
PPG17 Open Space, sports and recreation
PPG 24 Planning and noise
English Heritage Guidance on Conservation Area Appraisals and Conservation Area Management.

Regional
The London Plan (2004)
Mayor's London View Management Framework (2007)
Mayor's Energy Strategy (2004)
Local
Replacement Unitary Development Plan 2004
Westminster City Council's Community Plan – One City (draft)
'Air Quality Strategy & Action Plan' (2001) and 'Air Quality Strategy & Action Plan: Progress Report' (2005)
Open Space Strategy (draft)
Sustainable Buildings SPG
Economic Development Strategy
Nature Conservation Strategy (1997)
'Biodiversity Action Plan' (2000)
Design Matters in Westminster – Supplementary Planning Guidance on creating good City architecture
Development and Demolition in Conservation Areas
Railings In Westminster SPG
Roofs: A guide to Alterations and Extensions on Domestic Buildings
Shopfronts, Blinds and Signs
Westminster Way: A Public Realm Manual for the City
Inclusive access and Design SPG

Baseline Information

The Sustainability Appraisal requires relevant current information to set out the characteristics of the plan area and the environmental features likely to be affected. The gathering of baseline information provides the basis for monitoring and predicting effects enabling sustainability issues to be identified and suggest potential mitigation measures, or ways of dealing with them.

A crucial part of the procedure is to ensure that where possible each of the SA objectives is supported with comprehensive and up to date baseline information. The collection of baseline data for the appraisal needs to be co-ordinated with the development of the information base for the plan itself. The task is also linked to the development of the SA Framework which includes criteria and objectives.

Data was collated from a variety of sources, from very local to regional. Not all information was available, and certain datasets were too complex to translate into localised district or ward information practically in the time available. The Scoping Report again provides detailed information on the baseline data. The collection of baseline data for the SPD has helped to identify the key social economic and environmental issues that need to be addressed.

Table 3: Details the sustainability issues that exist for both the City of Westminster.

Sustainability Issues	Characteristics and supporting data
<p>Increasing pressure on the natural and built environment including:</p> <ul style="list-style-type: none"> • Immense pressure upon open space • General lack of open space in the residential areas in the north-west and south of the borough • The need to protect, enhance and increase biodiversity and Increase in habitats. • Problems caused by late night activities – noise, smells, rubbish • Need to protect and enhance the cultural heritage, both architectural and archaeological, particularly given the significance and high number of listed buildings and conservation areas. • Air pollution, the borough is a declared AQMA. 	<ul style="list-style-type: none"> • 2.2 ha of public accessible open space / 1000 resident pop. • Common standard of 1.6 ha / 1000 pop. Initially open space provision does look acceptable. But the vast influx of daily tourists and visitors swells the daytime population to approx. 1 million people. Reduces this standard to .5 ha / 1000. • Westminster covers an area of 365 hectares and 17.1% is deemed deficient in biodiversity. When compared to the other inner London Borough's Westminster is slightly better than average. But the situation is by no means satisfactory • The pressures placed on wildlife are compounded by the sheer number of daily visitors that enter the borough. • River quality when compared to the rest of the country is not very good, for London as a whole. • Westminster has 38 theatres, 60 Cinemas, 17 Casino's, 3,000 + eating, drinking, nightlife establishments.430 hotels (40% London's Hotel stock) Home national Ballet and Opera companies, museums and art galleries. All of which attract people to the C of W (City of Westminster) and contributes to increasing pressure on the environment as well as noise and rubbish issues. • The cleanliness of the public realm when compared to neighbouring borough's figures is not very good and when compared to the national average for authority type is not good at all. Is an issue when considered with the amount of visitors the city has and the importance it is as a tourist destination. • Protected vistas cross large parts of Westminster. This in turn will influence and shape spatial land use and building design. They therefore are significant when considering the impact upon sustainability. • Historic and listed buildings are an issue in Westminster because of their large number and level of importance. This will have an impact upon many spatial land use issues and decisions. There are over 11,000 listed buildings in Westminster, this represents 20% of Listed buildings in London. It also has 54 conservation areas, covering 76% of Westminster by area, as well as 1 World Heritage Site, 6 Royal Parks' 19 historic squares and gardens and 5 areas of special archaeological priority. • Air pollution affects residents, daily commuters and visitors to the borough. The AQMA for the whole of Westminster declared in 1999 for NO2 and PM10. In 2004 PM10 and NOx are at levels that exceed European standards.
<p>Noise and the impact upon human health and quality of life,</p> <ul style="list-style-type: none"> • Ambient noise levels • Noise impact from licensed and commercial activities • Cooling / heating plant for buildings • Transport noise 	<ul style="list-style-type: none"> • WHO state that to prevent serious annoyance during the day in outdoor living areas noise should not exceed 55db_{laeq} for a steady continuous noise. Night noise levels at the outside façade of living space should not exceed 45db _{laeq}. Note that the average hourly night time noise levels only drop below the WHO day time recommended values between 02:00-04:00.this data indicates that noise is a major issue in Westminster. • Westminster noise survey (June 2003) highlighted that traffic noise is the major issue in Westminster, particularly if the vehicle noise source is also included. Construction activities also have a relatively significant impact. Noting that this information does not indicate is the impact upon residents from entertainment and licensed premises. • A study of 17 London boroughs has shown that in 1999/2000 the number of Noise service request in Westminster was more than three times higher than the average and 45% higher than the figure for the next highest borough.
<p>Waste and recycling,</p> <ul style="list-style-type: none"> • No waste handling facility in Westminster recycling rates need to improve as population increases • Street cleansing important 	<ul style="list-style-type: none"> • There is no waste handling facility within the City primarily due to the immense pressure upon land. All of Westminster's waste has to be handled outside of the borough. • Recycled waste is material separated from municipal waste to be processed into marketable products. WCC is average when compared to other by figures but there are grounds to make huge improvements. Noting that in 2001 the C of W was responsible for 2,000 tonnes of disposable nappies. • A high proportion of municipal waste from Westminster is incinerated. Much higher than the average. • Westminster is below the national average and below neighbouring boroughs in terms of the percentage of the population that is by kerbside collection or are within 1KM of a recycling centre.

<p>Road transport and congestion are an issue The provision for pedestrians and cycling needs to be increased.,</p> <ul style="list-style-type: none"> • Quality of the public realm is important • Pedestrianisation is an issue due to the number of people entering Westminster on a daily basis. • Further support for alternative modes of transport, specifically cycling and walking, including green travel plans. 	<ul style="list-style-type: none"> • WCC has a daily influx of people that takes the borough's daily population to over 1 million (approx.). • In Westminster the underground is the predominant mode of public transport. • Walking in Westminster is also important. Despite this and the level of public transport access 13.2 % of residents still drive to work. • In Westminster there is increased reliance upon Public Transport for those with no access to car • The majority of the Borough has an excellent PTAL rating, level 6b(40.01+). The north west and south of the Borough has slightly less public transport access which does correlate with the more deprived areas in the borough. • Westminster has a very high level of road vehicle ownership. Particularly in comparison with the rest of London and England & Wales. • Congestion around the CCZ has decreased with Westminster having an average % change when compared to other London Boroughs that surround the CCZ. • The borough has intense pedestrian activity. Managing this number of people is a major challenge. Particularly with all the other land use pressures experienced in the Borough. • Overall trend for KSI (Killed or Seriously Injured) figures are that they have progressively dropped since 1990. When compared to neighbouring Boroughs the situation is not good. National target is to reduce Killed and Seriously Injured on GB roads by 40% by 2010 compared with 94-98 averages. In Westminster this means a reduction from 302 to 181 between 2000 and 2010 • WCC has good public transport links, which are reflected in the high proportion trips to school being made on these modal transport groups. • Cycling is an issue and advised by the Safe Routes to Schools officer this is manly down to lack of storage space. As well as possible safety issues. • Advised walking figures are relatively good and are help by the small catchment areas Westminster schools have.
<p>Climate change, climate change adaptation and air quality,</p> <ul style="list-style-type: none"> • Green house gas emissions and contribution to this global issue • Change in weather patterns • Increase in flood risk • Flash flooding and drainage issues. 	<ul style="list-style-type: none"> • The proportion of carbon emissions from commercial activity is very high. C of W accounts for 11.8% of this sectors total for London. • C of W emits 6.8 %of the total carbon emissions for the whole of London, which is approximately 0.6% of the whole of the UK's total. • The main contributing factor would be the amount of electricity consumed within the borough by commercial activities (12.6% of total emissions from electricity used in commercial activities for the whole of London). • WCC is also responsible for 11.4 of total carbon emissions from gas used in commercial activity for the whole of London. • The C of W figure is far higher than the figure for London. The main reason is the high proportion of commercial activity. Future climate in London is predicted to be, warmer, wetter winters more intense downpours of rain • Hotter drier summers, with more frequent and extreme high temp. Reducing the impact upon climate change and adapting to the predicted changes are vital and need to be addressed. No specific figures for C of W found. • The Thames region accounts for 10% of land in the UK and nearly a quarter of the population with a below average annual rainfall. Water is a major issue in the SE, London and so Westminster. • Flooding is deemed low risk but is something that needs to be taken into account, particularly as the true impact of climate change is not yet fully known.
<p>Sustainable building policies need to be embraced in a far greater fashion,</p> <ul style="list-style-type: none"> • Need to increase energy efficiency measures • Application of SUD's • Sustainability issues in historic and listed buildings as well as new developments 	<ul style="list-style-type: none"> • Difficult from this data to fully ascertain the issues from C of W perspective. But the nature of the intensely developed urban environment is conducive to cumulatively impacting on these types of water pollution incidents. • UK trend is for more electricity being generated from renewable methods. • For the Thames region the average water consumption in litres/ person /day in 2000 – 01 was 163 by 2004 – 05 reduced slightly to 161 litres/day. Increase in water consumption with a greater amount used in the Thames (therefore C of W) region that the country as a whole. This is important when the steady increase in people living in the region is on the increase. • The application of sustainable design and construction standards are required to assist in improving the over all contribution to sustainable development BREEAM and eco-homes would seem that sort of approach that would allow this to happen. • Refitting buildings so they embrace sustainability may pose difficulties in Conservation Areas and lead to some policy clashes.

<p>Supply of appropriate housing</p> <ul style="list-style-type: none"> • Homelessness is a major issue • supply of affordable and intermediary home • over crowding and polarisation and lack of family units 	<ul style="list-style-type: none"> • Little change in amount of homelessness in Westminster over the last 4 years. Although the number in London has dropped, a high proportion are in Westminster. Where as trend is falling in C of W is static. • Throughout the county and London number of houses completed has steadily increased. In Westminster this trend is very much the opposite. Except for social housing which has increased. • The number of dwellings in London is increasing on the same land size. This increase the pressure upon local services and infrastructure overcrowding and the density of people in C of W is a major issue being the third most crowded LA area in the country • No of council properties (2005) in Westminster was 12,407, this figure has consistently decreased over the last 11 years.
<p>Major challenge is the creation of cohesive and inclusive communities, which are sustainable</p> <ul style="list-style-type: none"> • Need to supply appropriate level of social and community facilities if sustainable communities are to be created and maintained • Mixed use pattern of land use creates conflicting issues • Remedy areas, which are recognised as deprived. • Health and well-being of all the community and Community cohesion and inclusion 	<ul style="list-style-type: none"> • Westminster has seen a steady increase in population from 174,842 in 1991 to 181,286 in 2001, which is a similar rate to the national increase. London as a whole has seen a greater increase in the number of people / hectare the ninth densest local authority in the UK. • Adult pop is higher than average with the children and elderly proportion being lower. • Ethnicity is diverse in Westminster and is not only reflected in these statistics but also by the fact that there are 120 languages (City Futures, City of Westminster Profile) spoken by residents in the borough. It is vital then to have an inclusive society, which can maximise the potential of all residents. • Westminster is a diverse religious community with Christian biggest group followed by no religion followed by Islam. • By comparison Westminster has a higher than average senior management/ professional occupation. Although it does have a slightly less than average small employers and lower supervisory employment types. • Life expectancy in Westminster is above the London average as well as the average for England and Wales for both men and women
<p>Maintain economic diversity and increase local opportunity</p> <ul style="list-style-type: none"> • Land and office cost very high in Westminster • Careful is not a victim of its own success, very successful economic activity covering a wide number of areas. Needs to include all age groups in facility provision • Education and job creation and distribution of wealth to local communities 	<ul style="list-style-type: none"> • 16,207 offices – 8.4 million m² • 8,526 retail premises – 2.2 million m² • GDP in 2005 was £16 billion • Number of business based in the borough is 47,000 (mar. 2005) • More business failing than starting up. With high % than for London and much high % for GB. • New business figures are similar to those for London and more than for GB as a whole • The supply of jobs far out strips the supply of residents and is far greater than the London and GB figures. • Westminster provides 14.1% of all employment in London (Economic Development Strategy, Mar.05) • Westminster has proportional more full-time jobs than rest of London and the country as a whole • Westminster more dependant on the service sector than the rest of London or GB. In particular finance, IT and business activities and tourism. Manufacturing is much lower than for GB. As is construction. The patterns are similar when compared to the rest of London. • Westminster has higher than average number of residents of working age • Huge disparity between average income male and female residents. Greater than for rest of London and the country. • Average pay is high than for the rest of London and the country as a whole • Westminster has less Job Seeker Allowance claimants (JSA) than London and slightly more than the GB average. • In all areas more men than women claiming JSA The trend is similar for all areas. With less younger people claiming JSA in Westminster. But more middle range claiming as with over 50's. • Westminster is a very deprived area on these indices. It is a borough of extremes with some of the wealthiest areas in the country next to some of the poorest. Church St and Queens Park are the two most deprived SOA in London and the UK – therefore the distribution of wealth across the Borough would appear to be a key issue. • When compared to the rest of London the education figures are not that different. Area where this is an issue is NVQ1 level which less than 5GCSE's is below the figures for London and GB. Over view at the very bottom of the scale and the top Westminster is above London and national figures. It is the middle of the scale where there are problems which is the school leavers type of education.

Likely Future Trends

There are some key factors, which can be identified and will have an impact upon the City, which are:

- Continuous redevelopment taking place with density of residential and commercial premises increasing. There are very few large sites available in the City of Westminster suitable for redevelopment.
- Current residential population is approximately 230,000 and this is expected to increase to between 310,000 and 350,000 by 2016. This predicted rise in population will increase pressure upon the social and community facilities and the local environment.
- Meeting the challenge of supplying affordable quality housing will always be an issue, due to the numbers of people living and wanting to live in the City, as well as the ever-increasing pressure on land.
- A growing population will increase pressure upon the local environment and social facilities and will increase the need for community cohesion and integration.
- Increasing availability of new technology to enhance and deliver services to all residents.
- The economy of the City of Westminster is important locally as well as nationally, with over half-a-million people employed and approximately 50,000 businesses located within the City. It will increasingly rely upon the service sector to provide jobs. Business tourism is set to increase and will require improved services and facilities.
- The 2012 Olympics will have a major impact upon the City of Westminster through Olympic events themselves, tourism, entertainment, shopping and hotel usage (presently 40 % of all of 's hotels are located in City of Westminster).
- Major transport infrastructure projects will have a huge impact from construction and when operational. Projects include Crossrail 1 and 2, Tram link between Waterloo and Kings Cross.

The Sustainability Appraisal Framework, including objectives targets and indicators

The identification of sustainability issues allows the development of a set of sustainability objectives, which will be used to appraise and modify policies, to increase their sustainability credentials. It can be seen as *a methodological yardstick against which social, environmental and economic effects of a plan can be tested*.¹

The sustainability objectives have been developed in the first instance by researching issues specific to the City of Westminster through detailed discussion with key officers in the Local Authority. These issues have then been used to guide and target the collection of baseline information, which in turn has provided the evidence base to form an initial set of sustainability objectives. These have subsequently undergone an extensive internal consultation process resulting in the

¹ ODPM Guidance

sustainability objectives, which are set out below in Table 6. Objectives have been reviewed and adjusted to create the 17 sustainability objectives (see appendix 1 for objectives, sub-objectives and indicators), which have been used to assess the sustainability aspects of the draft SPD and are listed below in table 4.

These sustainability objectives have also been formulated having regard to the need to be consistent with those in the London Plan, the higher tier regional spatial plan.

Table 4 SA objectives and their support of the three key pillars of sustainable development.

	Sustainability Objectives	Social	Environ	Economic
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 meet homeless, affordable, intermediary, over crowding and family unit demands.	✓		
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 minimise flood risk, promote sustainable urban drainage and protect surface and ground water quality.		✓	
8	To protect, enhance and create environments that encourages and support biodiversity.		✓	
9	To improve air quality.	✓	✓	
10	To reduce the impact of noise.	✓	✓	✓
11	To reduce the need to travel and use of private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport.	✓	✓	✓
12	To reduce waste production and increase recycling and recovery 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 borough.	✓	✓	
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.	✓		✓

The sustainability objectives have also been derived so that they meet the environmental protection objectives set out in the SEA Directive. This is demonstrated in Table 5, which demonstrates how the sustainability objectives support and meet the SEA Directives key environmental protection issues.

Table 5 listing SA/SEA objective and their link to SEA Directive protection objectives

Environmental protection objectives (part f, Annex 1, Directive 2001/42/EC)	Sustainability Objectives
Biodiversity	7, 8, 9, 14, 15
Population (this term is not clearly defined in the Directive)	1, 2, 3, 4, 5,
Human Health	1, 2, 3, 4,
Fauna	5, 8, 15
Flora	5, 8, 15
Soil	7, 13
Water	5, 6, 7,
Air	5, 9, 11,
Climatic Factors	5, 6, 7, 11, 12,
Material Assets (this term is not clearly defined in the Directive)	3, 5, 6, 7, 14
Cultural heritage – Architectural, archaeological,	13, 14, 15
Landscape	5, 7, 13, 14, 15

Sustainability Objectives Framework

The Sustainability Objectives have been assessed for their compatibility with each other to identify any potential conflict between the individual objectives. For this assessment each objective had the same weight and equal importance. The resulting matrix set out in Figure 1 identifies where potential clashes between individual objectives may exist.

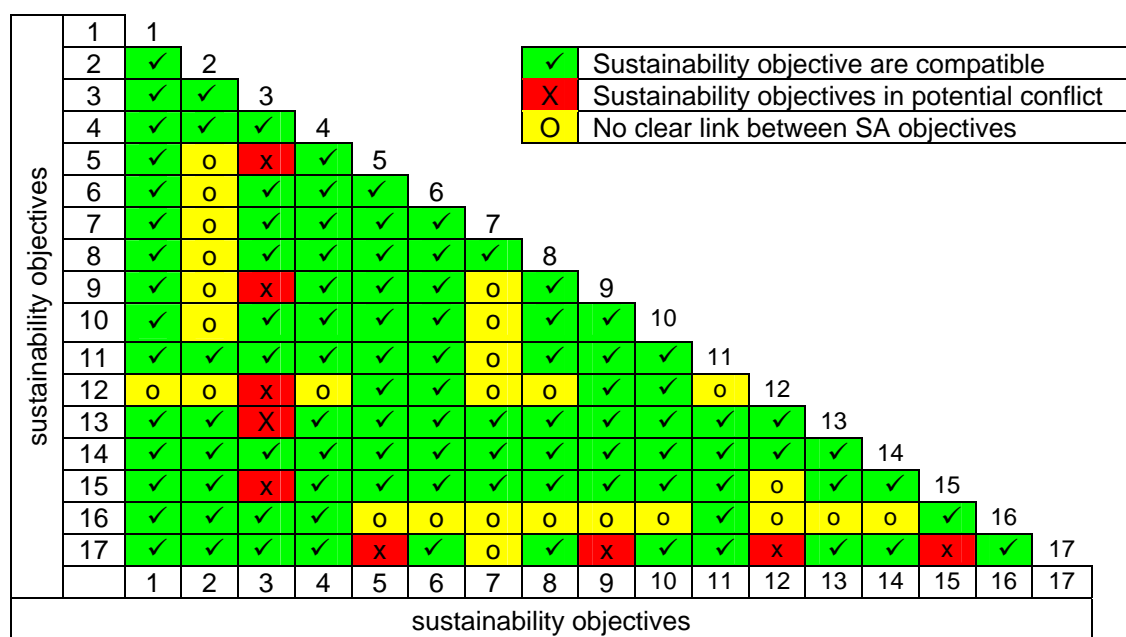


Figure 1. Assessment of the compatibility between the sustainability objectives.

It demonstrates that the majority of the objectives are compatible with each other or that there is no clear link and therefore no predicted conflict. There are a number of exceptions where possible conflict between two sustainability objectives may exist.

Objective 3 (appropriate housing units) and 17 (sustainable economic growth) are predicted to be in conflict with other sustainability objectives. This is because they both require the potential increase in activities, which could contribute to increasing pressure upon the local environment. This includes increasing carbon emissions,

contributing to local air pollution, producing more waste; and placing further pressure upon green space and the historic environment.

The assumptions or justification for the conflicting objectives are presented below in Table 6 accompanied by considerations that will assist in mitigating the predicted issues.

Conflicting objectives	Comments / Justification / Assumption	Mitigation / Resolution / Consideration
3 and 5	With an increase in residential units there will be an increase in space heating / cooling, which along with associated transport demands is likely to increase greenhouse gas emissions.	Climate change consideration will need to be taken in to account when forming policies relating to residential unit construction, conversion or refurbishing
3 and 9	An increase in the number of housing units will mean an increase in space heating from boilers and increasing demands on transport usage, including private road vehicles, all of which will impact upon air quality	Air quality consideration will need to be taken into account when form policies. Will also reflect other plan objectives – WCC AQAP, The Mayors AQAP and national AQAP.
3 and 12	Increase in residential units will increase the amount of municipal waste that will need to be collected and recycled.	Waste and recycled material storage space need to be supplied in residential developments and services need to be able to cope with potential increases in waste and recycled material.
3 and 13	Pressure to supply more residential units could impinge on historic environment as the demand for housing is satisfied.	Careful consideration for the historic environment needs to take place to prevent this happening; difficult as pressures on land constantly increase.
3 and 15	More residential units are likely to increase pressure on open space by actual land take and increase in numbers using the open spaces.	Land pressure in very difficult to resolve. Have green space is vital for social well being and community cohesion.
17 and 5	Any increase in economic activity is likely to have a negative impact upon greenhouse gas emissions because of the increase in buildings and subsequent heating / cooling demands and transport requirements.	Climate change consideration will need to be taken in to account when forming policies relating to commercial unit construction, conversion or refurbishing
17 and 9	Increasing economic activity will require more commercial buildings requiring space heating / cooling which, will contribute to levels of air pollution. Also, more people travelling to work in the City will increase demands on transport again will contribute to air pollution.	Air quality consideration will need to be taken into account when form policies. Will also reflect other plan objectives – WCC AQAP, The Mayors AQAP and national AQAP.
17 and 12	An increase in economic activity is directly and indirectly likely to increase waste production.	Recycling within commercial organisations needs to be encourage and so reduce the conflict between these two objectives
17 and 15	Increase in economic activity may increase pressure on open space as more people use then for recreational purposes	The increase in pressure upon open space is inevitable if more people work in Westminster.

Table 6. Identification and explanation for conflicting objectives.

The potential for conflict between sustainability objectives are not insurmountable and through the development of policies these can be minimised. The identification of these potential conflicts now means that this information can guide and inform future policy decisions.

5 SPD Options Appraisal

Main options and how they were identified

One of the key requirements of SA is to consider reasonable alternatives as part of the assessment process. The aim of options appraisal is to assess the preferred option alongside others previously considered, against the sustainability framework.

This process enables comparison between options, highlighting any potential implications on sustainability. The appraisal of options also enables recommendations for mitigation of negative impacts and suggestions for modifications to the preferred option as presented in the draft SPD.

The options have been appraised against the Sustainability Objectives, in environmental, social and economic dimensions. A scoring system was used for every objective, for the short, medium and long term and a summary of the option against each of the dimensions were reached. A conclusion sums up the general impact the option would have and makes comments on the sustainability of this option.

The main options identified for the Metropolitan Views SPD can be described as a “Do Nothing” and a “Best Practice” approach.

Option 1 The “Do Nothing” option consists of the current situation, with the policy in place to protect metropolitan views but no guidance which identifies where these views are and how the policy will be interpreted.

Option 2 The “Best Practice” option consists of the current policy supported by new guidance in the form of the draft Metropolitan Views SPD.

A table showing appraisal of options can be found at **Appendix 4**.

Option 1 –

This option does not have any significant effects against the sustainability objectives. For the majority of objectives the effect would be neutral. This option would fail to maximise opportunities to preserve and enhance the historic built environment. Objective 13 of the sustainability objectives '*Protect the historic environment...and architectural heritage*' is currently reasonably well met by UDP policy. However changing circumstances - the increasing number of tall buildings applications - are likely to lead to the under protection of the historic environment in respect of views.

Against the social objectives, evidence suggests that the historic built environment can have positive knock on effects on education and community involvement. An opportunity to foster educational and community involvement in the historic environment may well improve social cohesion.

Economically the do nothing option is likely to have a minor negative effect. The conservation of the historic built environment has the potential to give economic confidence, stimulate economic growth, and actively aid in regeneration. Westminster's historic built environment forms the focus of tourism which brings substantial economic benefits. Thus the effect of damage to metropolitan views likely to result from option 1 is likely to translate to damage to economic growth in the city.

With regards to **Option 2**, 'adopt a metropolitan views SPD, the Council recognises the important role of the historic environment to the character of Westminster, with associated environmental, social and economic benefits.

Whilst it is evident that development within the historic environment can rarely occur without some form of compromise, it is unlikely that the adoption of the SPD would have any notable negative impacts and this should provide clarity for developers.

This guidance also helps to formulate proposals to enhance the historic environment having long lasting impacts and helping to preserve local distinctiveness with the associated sustainability benefits.

Socially, although in some instances the links are rather limited or neutral, this option can, if adequately consulted on, help to generate a sense of local ownership to the area. Furthermore this can help towards other social issues such as crime by encouraging people to value their surroundings, which should have a cumulative effect of improving and the physical environment of locations.

Economically again this option should have an overall positive impact especially in relation to tourism and sustainable growth, benefiting businesses by enhancing areas. There is no evidence that mid-height buildings cannot deliver economic growth.

The preferred option is thus to prepare a Supplementary Planning Document on Metropolitan Views .

6 Appraisal of Plan's Effects

This section provides a record of the prediction and assessment of the potential effects of the draft SPD. The appraisal process has used an appraisal framework. The analysis is presented in Appendix 5 and includes each of the plan objectives. The plan objectives are appraised in turn for their potential impact on each of the sustainability objectives. Scores are recorded on a five-point scale (major negative impact; minor negative impact; neutral impact; minor positive effect; major positive effect; impact uncertain).

The appraisal process has considered the following issues:

- Direction of effect: is the policy moving towards or away from sustainability?
- Severity of effect: will the effect be marginal or significant?

- Cumulative and synergistic effects: are there potentially significant effects resulting from a combination of activities, which may be insignificant individually?
- Trans-boundary effects: does the effect impact on adjoining boroughs?
- Timing of Effect: does the effect occur immediately or later, does it last indefinitely or only temporarily?

The plan's objectives appraised in this way are as follows:

- Expand upon the UDP Policy DES 15: Metropolitan and Local Views by providing a detailed appraisal of views of special interest in Westminster.
- Provide a fair effective and transparent mechanism for reviewing the impact of development proposals on metropolitan views.
- Identify potential enhancements and proposals for the future management of each view.

Potential overall effects of the draft SPD

The matrix shows that the majority of the sustainability objectives are affected either positively or very positively by the implementation of the SPD. Possible negative impacts of the SPD on sustainable development are.

- **Improve affordability of housing**
- **Encourage and facilitate the use of low emission technology and fuels**
- **Make land and property available for business development**

However these effects are uncertain and will be monitored.

Time scale and reversibility

Each action has been assessed for its potential impact over time and if negative whether it is reversible. The main findings of this assessment are;

- Almost all time scales for implementation and resulting impacts is for the medium and long term. This is mainly because of the lead in times for the actions, the actual nature of the actions and what they set out to achieve.
- All impacts, both positive and negative, are perceived to be reversible

IMPLEMENTATION AND MONITORING

The significant sustainability effects of implementing the draft SPD will be monitored to help identify unforeseen adverse effects and to enable remedial action to be taken. The Council is required to prepare Annual Monitoring Reports to assess the implementation of the Local Development Scheme and the extent to which policies in

the Local Development Documents are being achieved. The SPD will be included in this process.

Key next steps

1. Appraisal of any significant changes proposed to the draft SPD not already considered.
2. Publishing a statement following adoption of the SPD setting out any changes to the SPD in response to the SA process
3. Monitoring the significant effects.

Conclusion

The Sustainability Appraisal process has enabled assessment to be made of the social, environmental and economic impacts of the metropolitan views policy both with and without the SPD. The guidelines should help give clarity to applicants on the which views this council considers to be important and how it will assess the impact of proposals on these.

The main benefit of the SA process is that it has enabled the development of mitigation measures and monitoring which will ensure that any adverse impacts can be minimised. The SA process has also documented the status of social, environmental and economic aspects of the area in the form of baseline data, which will act as a check to determine whether any unintended consequences are resulting from the publication of the SPD.

The conclusion of the SA process is that option 2 with the SPD in place is the most sustainable and will:

- Lend clarity to the planning process
- Help safeguard Westminster's historic built environment and promote a high quality environment for residents and business, with associated economic benefits especially relating to tourism
- Safeguard the character of open spaces and promote improvements to public realm and street environment

The draft SPD will now go out to public consultation with stakeholders to ascertain views. The responses will be taken on board and policies developed or adjusted where necessary.

The significant sustainability effects of implementing the draft SPD will be monitored to help identify unforeseen effects and to enable remedial action to be taken. This will mean the Metropolitan Views SPD will be a more sustainable document and will

thereby embrace social responsibility, economic development and environmental protection.

Appendices

- Appendix 1: Analysis of Policies, plans and programmes**
- Appendix 2: Baseline Data for the City of Westminster**
- Appendix 3: Sustainability Objects and associated London Plan objectives**
- Appendix 4: Sustainability Objective development through consultation**

**Appendix 1:
Appendix One**

**Consultees on the Scoping Report
SEA Consultation bodies**

English Heritage
Environment Agency
Natural England

Representatives of other interests

English Heritage
Westminster Property Owners Association
The Westminster Society
Westbourne Neighbourhood Association
Paddington Waterways and Maida Vale Society
The St Marylebone Society
Micheal Sharman
The Knightsbridge Association
The Thorney Island Society
Land Securities

Appendix 2 Relevant Plans, Policies and Programmes

International

The Johannesburg Declaration on Sustainable Development		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Promote the integration of the three components of sustainable development — economic development, social development and environmental protection — as interdependent and mutually reinforcing pillars. Poverty eradication, changing unsustainable patterns of production and consumption and protecting and managing the natural resource base of economic and social development are overarching objectives of, and essential requirements for, sustainable development. 	The sustainability appraisal by its nature will inference and guide the policies so that they fully embrace these requirements	All sustainable issues will be addressed in the SA/SEA and influence the LDF so that it contributes to the principles of sustainable development.

Europe

Council Directive 79/409/EEC on the conservation of wild birds		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> The long term protection and conservation of all bird species naturally living in the wild within the European territory of the Member States (except Greenland). 	Ensure the implications of this document are met through the SA.	Biodiversity issue needs to be addressed
Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Conserve fauna and flora and natural habitats of EU importance. Establish a network of protected areas to maintain both the distribution and abundance of threatened species and habitats. 	Identify relevant habitats and consider appropriate measures to protect these species and habitats in the appraisal.	Biodiversity issue needs to be addressed.
Air Quality Framework Directive 96/62/EC and daughter directives (99/30EC), (2000/69/EC), (2002/3/EC)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Objective is to improve air quality through out Europe by monitoring certain pollutants and set alert thresholds for specific pollutants. The Framework Directive was followed by daughter directives, which set the numerical limit values, or in the case of ozone, target values for each of the identified pollutants. The daughter directives are to harmonise monitoring strategies, measuring methods, calibration and quality assessment methods to arrive at comparable measurements throughout the EU and to provide for good public information. 	The City is subject to an AQMA declaration, which mean air quality and levels of pollution need to be addressed in the core strategy.	Air Quality needs to addressed and policy impacts assessed
European Spatial Development Strategy		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Limit climate change and increase the use of clean energy Address threats to public health Manage natural resources more responsibly Improve the transport system and land use management Combat poverty and social exclusion and deal with the economic ad social implications of ageing society 	The requirements and objectives need to be incorporated and integrated into the Core Strategy.	Objectives are reflected in the SA objectives as well as the Core Strategy

National

UK Sustainable Development Strategy – Securing the Future		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Achieving a sustainable economy – strong and stable economy offering prosperity and opportunity to all, following the polluter pays principle. Promoting good governance – effective, all inclusive participation at all levels of society Using sound science responsibly – policy developed and implemented using scientific evidence combined with the precautionary principle. Living within environmental limits – respecting the limits of the environment, resources and biodiversity. Ensuring a strong, health and just society – meeting all the needs of all the people and including well being, social cohesion and equal opportunities for all. 	As a set of principles they should be incorporated and embraced through out the whole of the Core Strategy.	Not only consider social, environmental and economic issues but also endorses the engagement with people and basing decisions on sound science which is a key part of the SA process
UK Climate Change Programme		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Sets out the Governments commitments to meeting climate change by Reducing emissions of greenhouse gas emissions Adaptation to the unavoidable impacts of climate change. 	Policies in the Core Strategy must contribute to the reduction of green house gas emissions. They must also contribute to the adaptation to the impacts of climate change	Consider in the SA objectives the reduction of green house gas emissions and climate change adaptation actions.
PPS 1 Delivering sustainable development		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA

Facilitate and promote sustainable patterns of urban and rural development by: <ul style="list-style-type: none"> Making suitable land available for development in line with economic, social and environmental objectives to improve the quality of life. Contributing to sustainable economic growth. Protecting and where possible enhancing the natural and historic environment and the quality and character of the countryside, and existing successful communities. Ensuring high quality development through good design. Ensuring that development supports existing communities and contributes to the creation of safe, accessible, sustainable communities 	Core Strategy documents need to take objectives in to account and are integrated into policies.	A PPS on sustainability is going to be closely linked to the objectives of the SA
PPS 6 Planning for town centres		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Planning and promoting the growth of existing town centres. Encouraging wide range of services in these centres which meet the needs of the entire community 	Policies promote the viability and increase vitality of existing town centres as well as minimising amenity	The SA will need to identify potential conflict between policies that may effect the viability of town centres.
PPS 9 Biodiversity and Geographical conservation		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Sustain, maintain, restore and enhance biodiversity and environmental resources Ensure appropriate assessment is made to protected sites of biological importance To accommodate biodiversity within new development, recognising the link between nature conservation and a sense of well-being in the community. This corresponds with biodiversities role in supporting economic diversification. 	Policies need to take into account the need to protect and enhance biodiversity.	Identify which policy options will have the most positive effect on biodiversity and contribute to sustainable development.
PPS 10 Planning for sustainable waste management		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Help implement national waste strategy and provide framework which allows sufficient provision waste facilities to meet the needs of the whole community 	Sustainable methods of handling waste should be embraced by the plan. Including the application of the waste hierarchy	Identify the most sustainable waste management policy options
PPS 12 Local Development Framework		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Establishes the format and methodology to be employed to implement the new planning system documents. 	Is a guiding PPS on the whole process so influence is Paramount.	SA must comply with this planning policy statement.
PPS 22 Renewable energy		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Statement of government policy concerning planning and development control of renewable energy developments. UK target to generate 10% of electricity from renewable sources by 2010, and 20% by 2020. 	Establishes targets for renewables. Endorses policies that actively encourage the inclusion of renewable energy in new development.	Policies need to employ the best option for promoting the uptake of renewable energy in new and importantly existing buildings.
PPS23 Planning and pollution control		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Consideration should be made to the quality of land, air and water and potential impacts from development Potential sensitivity to pollution – landscape, soil, air, water nature conservation. Reduce land use conflict caused by mixed use developments Compliance with statutory environmental quality standards Limit GHG emissions and take into account potential effects of Climate Change (including drainage) Cumulative impacts to be considered 	Impacts of existing pollution are minimised and that any new development does to increase pollution levels in general.	SA will identify options that allow development which minimise cause of environmental pollution
PPS 25 Development and Flood Risk		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
Appraising risk <ul style="list-style-type: none"> identifying land at risk and the degree of risk of flooding from river, sea and other sources in their areas; preparing Regional Flood Risk Appraisals (RFRAs) or Strategic Flood Risk Assessments (SFRAs) as appropriate, as free-standing assessments that contribute to the Sustainability Appraisal. Managing risk <ul style="list-style-type: none"> framing policies for the location of development which avoid flood risk to people and property where possible, and manage any residual risk, taking account of the impacts of climate change; only permitting development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and benefits of the development outweigh the risks from flooding; Reducing risk <ul style="list-style-type: none"> safeguarding land from development that is required for current and future flood management reducing flood risk to and from new development through location, layout and design, incorporating sustainable drainage systems (SUDS); using opportunities offered by new development to reduce the causes and impacts of flooding eg surface water management plans; making the most of the benefits of green infrastructure for flood storage, conveyance and 	Flooding issues need to be addressed by the Core Strategy policies which will also be informed by the SFRA	Identify policy option which will provide the minimal risk of flooding and support methods that reduce the effects of flooding incorporate outputs from the SFRA

SUDS: re-creating functional floodplain; and setting back defences;		
PPG 4 industrial, commercial development and small firms		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Encourage economic growth which is compatible with environmental objectives Give greater certainty as to types of development allowed in specific locations Commercial activity located where transport is most efficient and road traffic reduced Mixed use is acceptable and encouraged unless specific environmental adverse effects are likely. Optimum use should be made potential sites and existing premises. 	The needs for business and economic development need to be taken into account and considered along side environmental and social implications.	The SA will assist in identify potential conflict between economic policies and the environment and social considerations.
PPG 8 Telecommunications		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Facilitates the growth of telecommunication systems while keeping environmental impacts to a minimum, with particular concern for impacts upon buildings of architectural or historic importance. Take into account cumulative impact of multiply masts Location of mast relative to sensitive receptors 	The improvement of telecommunication should be balanced against the protection of the environment and society.	Infrastructure provision needs to be taken into account from the impacts upon the environment, society as well as an economic perspective.
PPG 13 Transport		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Integrated transport policy –</p> <ul style="list-style-type: none"> Within and between different types of transport With policies for the environment With land use planning With policies for education, health, and wealth creation <p>As well as to integrate planning and transport at the national, regional, strategic and local level to:</p> <ul style="list-style-type: none"> promote more sustainable transport choices for both people and for moving freight; promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and Reduce the need to travel, especially by car. 	To provide for an integrated transport needs across the City making it easier and safer for people to travel. Include positive proposals to reduce the need o travel	SA should take into account SA carried out on the Local Implementation Plan. It should ensure that there is an increase in sustainable transport choice and that transport policies increase accessibility to all sectors of the community.
PPG 15 Planning and historical environment		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Should be effective protection for all aspects of the historic environment The physical survival of our past is to be valued and protected as a central part of out cultural heritage. 	Need to protection of historic buildings and conservation areas. Consideration should be given to their preservation and their contribution to social and economic development.	Identify the most appropriate policy options that offer protection to historic buildings and conservation areas while meeting social and economic needs
PPG 16 Archaeology and planning		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Archaeological remains are irreplaceable, they are the only evidence of past development of our civilisation. In particular care must be taken to ensure that archaeological remains are not needlessly or thoughtlessly destroyed. 	Need to meet the balance between protection and preservation off archaeological sites with the need to meet social and economic needs of an area	Identify the most appropriate policy options that protect archaeological sites while meeting social and economic needs
PPG17 Open Space, sports and recreation		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> Setting local standards for open space and identify extra provision requirements as well as improving access and existing facilities. Maintain an adequate supply of Open Space by protecting existing facilities (including playing fields), using development opportunities to improve open space and associated facilities, prevent the erosion of quality of open space, better management of open space New open space should taken in to account; accessibility, contribute to town centre vitality, improve the quality of public realm, provision of open space in commercial areas, safety, meet regeneration needs, social inclusion and needs of tourists Use planning obligations to alleviate local deficiencies. Particularly where quality and or quantity is threatened and local needs are increased. 	The provision and protection of open space is vital and this will need to be reflected in the plan. Its protection thorough strong robust policies will be required as pressures on land increase across the City.	Open space is very important part of creating and maintaining sustainable communities. Its protection and enhancement are important economically, socially as well as environmentally.
PPG 21 Tourism		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<ul style="list-style-type: none"> The continuing growth in tourism generates a range of economic activity and new job opportunities. Tourism industry should flourish while respecting the environment. Achieving economic growth while conserving the environment is the central objective. 	Policies need to address the issues and demands placed on Westminster by the numbers of tourists and recognise their importance to the City's and country's economy.	Policy options need to be identified which allow the most sustainable methods for coping with the huge amount of tourism infrastructure required to cope with the large numbers of tourists that visit Westminster every year.
PPG 24 Planning and noise		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA

<ul style="list-style-type: none"> Noise can have a significant effect on the environment and on the quality of life. Development of specific land uses should be guided to appropriate locations. Development plans should give developer and the community a degree of certainty about areas where particular types of development will be acceptable 	<p>Policies should take into account the impact of noise across the City. With particular focus on preventing noise generating land use being located near to noise sensitive land uses.</p>	<p>Will need to focus on minimising the impact of noise upon the local environment and community. Noise pollution can effect not only the environment but cause social and economic issues as well. The SA needs to establish the best policy option, which will result in the least impact upon the three strands of sustainable development.</p>
English Heritage Streets for All		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Guidance on the way in which our streets and public open spaces are managed. These spaces, sometimes known as the 'public realm', range from city squares to country lanes. Their appearance is often the product of several different agencies each with its own priorities.</p>		<p>Relevant particularly to viewing area and view foregrounds</p>

Regional

The London Plan		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>LDF must be in general conformity with the London Plan.</p> <p>Three key themes</p> <ol style="list-style-type: none"> health of Londoners equality of opportunity Contribute to sustainable development. <p>And six key objectives which are;</p> <ol style="list-style-type: none"> To accommodate London's growth within its boundaries without encroaching on open spaces. To make London a better city for people to live in. To make London a more prosperous city with strong and diverse economic growth. To promote social inclusion and tackle deprivation and discrimination. To improve London's accessibility. To make London a more attractive, well-designed and green city. 	<p>The policies in the Core Strategy have to be in general conformity with the London Plan.</p>	<p>The London Plan has had a sustainability Appraisal carried out on it therefore policies that directly refer to it should be as sustainable as is practically possible.</p>
Mayor's Transport Strategy (2001)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>The Mayor has ten key transport priorities.</p> <p>(a) Reducing traffic congestion.</p> <p>(b) Overcoming the backlog of investment on the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services.</p> <p>(c) Making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing frequency of services.</p> <p>(d) Better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service.</p> <p>(e) Increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities, improved orbital rail links in inner London; and new Thames river crossings in east London. The Mayor's Transport Strategy highlights 6 Greater London Authority</p> <p>(f) Improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice.</p> <p>(g) Supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better improved co-ordination maintenance of roads and bridges of street works.</p> <p>(h) Making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts.</p> <p>(i) Improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion.</p> <p>(j) Bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environments.</p>	<p>The transport priorities set out in the Major's Transport Strategy are directly addressed by WCC Local Implementation Plan. Transport policies in the Core Strategy should complement and be guided by the LIP.</p>	<p>Transport, in particular public transport is vital for the economic and social vitality of a city. Good public transport also helps to reduce the amount of private road transport used. The LIP has had a SA carried out on it therefore Core Strategy policies that are in compliance with the LIP should already be as sustainable as is practically possible.</p>
Mayor's Biodiversity Action Plan (2002)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>The majors BAP sets out a number of policies which are;</p> <ul style="list-style-type: none"> The Mayor will work with partners to protect, manage and enhance London's biodiversity. The Mayor recognises the unique role of the River Thames in London's history and in the lives of Londoners, 	<p>Policies in the Core Strategy need to reflect the mayor's policies and so making sure biodiversity is taken into full consideration when formulating Core Strategy policies.</p>	<p>Biodiversity as a subject area is key to meeting sustainable development policies. It is an issue for an inner city area and increasing the levels are important and so reflected in the Core</p>

<p>and its value for transport, recreation, biodiversity and archaeology. In recognition of their importance, the Mayor has set up the concept of a Blue Ribbon Network for the Thames and London's waterways and the land alongside them.</p> <ul style="list-style-type: none"> • This will establish principles concerning the use and management of the water and land beside it. • The Mayor will encourage and promote the management, enhancement and creation of green space for biodiversity, and promote public access and appreciation of nature. • The Mayor will promote the conservation and enhancement of London's farmland biodiversity. • The Mayor will seek to ensure that opportunities are taken to green the built environment within development proposals and to use open spaces in ecologically sensitive ways. This is particularly important in areas deficient in open spaces and in areas of regeneration. • The Mayor will promote local opportunities for regular direct contact with the natural world, through a variety of types of open space (such as allotments, community and cultural gardens, school grounds, environmental education centres and city farms, as well as informal wildlife areas). • The Mayor will promote environmental education, participation and training for all ages and across all sectors of London's society. • London's many species, and the landscapes where they are found, should be celebrated and promoted. • The Mayor supports the establishment and maintenance of partnerships at London wide and local levels to produce and implement Biodiversity Action Plans. • The Mayor will promote the reputation of London as a world centre of excellence for biodiversity conservation, working with London's world class organisations for greater influence globally and to learn from exemplary experience at home and abroad. • The Mayor will encourage the business community to play a major role in implementing the programme for conserving London's biodiversity. • The Mayor will encourage practices, and support existing effective initiatives, that reduce London's impact on biodiversity elsewhere. • The Mayor is committed to increasing the funding for biodiversity projects in London, and wishes to ensure that major new development projects include provision for biodiversity. • Progress in conserving London's biodiversity should be measured with particular reference to the status of important species and habitats, and progress on proposed actions or targets. 		<p>Strategy The SA will need to identify the best policy options in terms of protecting and enhancing biodiversity across the city</p>
<p>Mayor's Ambient Noise Strategy (2004)</p>		
<p>Requirement or objectives</p> <p>The aim of the Mayor's ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework.</p> <p>Three key issues are</p> <ol style="list-style-type: none"> 1. Securing good noise reducing road surface 2. Securing a night aircraft ban across London 3. Reducing noise through better planning and design of new housing 	<p>Requirements and objectives to be integrated into the Plan</p> <p>Consideration should be given as to how the plan can assist in reducing the impact of noise through better planning and design.</p>	<p>Implications for the SA</p> <p>Noise is a major concern and issue in Westminster particularly with the ever-growing 24-hour economy and pressure to increase mixed use development.</p> <p>The SA should identify option that will minimise the potential impact of noise on the environment and society.</p>
<p>Mayor's Air Quality Strategy (2002)</p>		
<p>Requirement or objectives</p> <p>The Mayor's aim is to minimise the adverse effects of air pollution on human health and to improve air quality to a level that everyone can enjoy, making London a more pleasant place in which to live, work and to visit.</p> <p>Key areas of work set out in the Mayor's Air Quality Strategy;</p> <ul style="list-style-type: none"> • Reducing pollution from road traffic by reducing the amount of traffic and reducing emissions from individual vehicles • Grants for cleaner vehicles • Reducing emissions from air travel • Sustainable buildings • Reducing pollution from industry and construction 	<p>Requirements and objectives to be integrated into the Plan</p> <p>All London boroughs are required to have regard to the Mayor's Air Quality Strategy when undertaking their air quality work, and to ensure their local development plans are in general conformity with the Mayor's London Plan.</p>	<p>Implications for the SA</p> <p>SA need recognise the best policy options that will assist in reducing air pollution and its impact upon the social, environmental and economic factors</p>
<p>The View Management Framework GLA 2007</p>		
<p>Requirement or objectives</p> <p>Provides guidance and policies on the protection of London views.</p>	<p>Requirements and objectives to be integrated into the Plan</p> <p>Conservation Area Audits identify local views using criteria suggested in the guidance</p>	<p>Implications for the SA</p> <p>Sustainability Objectives must identify the most appropriate options for the protection of views whilst allowing for social and economic development.</p>
<p>Mayor's Energy Strategy (2004)</p>		
<p>Requirement or objectives</p> <p>The Strategy's specific aims are:</p> <ul style="list-style-type: none"> • Reducing London's contribution to climate change by minimising emissions of carbon dioxide from all 	<p>Requirements and objectives to be integrated into the Plan</p> <p>The plan needs to increase the use of renewable energy increase energy efficiency measures and contribute to reducing greenhouse</p>	<p>Implications for the SA</p> <p>Climate change and adaptation to climate change is an overarching issue that must be addressed. It will have an impact to a</p>

<p>sectors (commercial, domestic, industrial and transport) through energy efficiency, combined heat and power, renewable energy and hydrogen.</p> <ul style="list-style-type: none"> Helping to eradicate fuel poverty by giving Londoners, particularly the most vulnerable groups, access to affordable warmth. Contributing to London's economy by increasing job opportunities and innovation in delivering sustainable energy, and improving London's housing and other building stock. 	gas emissions	lesser or greater degree on all policies in the Core Strategy and subsequently this needs to be addressed in the SA. Maximising renewable energy and energy efficiency measures will need to be identified by the SA when assessing the policy options.
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Local

Westminster City Council's Community Strategy – The City Plan 2006-16 (draft)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>The City Plan sets a vision for the future and outlines key aims and priorities to achieve this vision over the next ten years. It does this by establishes the four key goals with the priorities to achieve these goals which are;</p> <ol style="list-style-type: none"> An Improving City Environment <ul style="list-style-type: none"> A safer city A more sustainable, cleaner and greener city A well-designed and distinctive city Better Life Chances for All Our Citizens <ul style="list-style-type: none"> A better city for children and young people A city of opportunity meeting the aspirations of all our citizens A strong and economically thriving city built in partnership with business Cohesive Communities and engaged Citizens <ul style="list-style-type: none"> A more united City A stronger voice for local people Customer Tailored Services. <ul style="list-style-type: none"> Accessible services Locally-focused services 	<p>The LDF is seen as the spatial expression of the Community Strategy and so is directly affected by its objectives, which need, to be represented in the Core Strategy policies.</p>	<p>As the city plan is designed to economic, social and environmental well being of the city the policies it affects should be sustainable.</p>
Westminster City Council's Unitary Development Plan (Agreed for adoption on the 24th January 2007)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>The UDP sets out planning policies for developing land, improving transport and protecting the environment for the next 10 – 15 years. It advises on the types of development likely to get planning permission. It gives guidance for planners when deciding on planning applications and the basis by which planning decisions are defended at public enquiry</p> <p>Specifically ENV 16: Trees and Shrubs</p> <p>(A) All trees in conservation areas and all those trees subject to Tree Preservation Orders will be safeguarded unless dangerous to public safety or, in rare circumstances, when felling is required as part of a replanting programme.</p> <p>(B) Planning permission will be refused for development likely to result in the loss of or damage to a tree, which makes a significant contribution to the ecology, character or appearance of the area.</p> <p>(C) Planting of new or replacement trees may be required as a condition of a planning permission. Conditions for replacement trees may specify planting of the successor prior to the felling of the tree it will replace.</p> <p>(D) New proposals for tree planting and shrubbery should respect the historic street character, views and settings of buildings, be appropriate to the location, and consider their contribution to biodiversity.</p> <p>(E) The City Council will protect trees that form part of green corridors, particularly those located at the rear of private gardens.</p>	<p>The UDP policies will set the foundation or stating point for the policies that will make up the core strategy.</p> <p>ENV16 is the key policy that this SPD will support and expand on. It therefore is fundamental to the SPD</p>	<p>The SA will need to make sure that the policies set out in the SPD are balanced and contribute not only environmentally but also socially as well as economically to sustainable development.</p>
RB Kensington and Chelsea Unitary Development Plan (adopted 25th May 2002)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Is the same type document as Westminster's UDP therefore same requirements and objectives</p>	<p>As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.</p>	<p>To identify any potential conflict that may result in unsustainable policies being formulated</p>
LB Bent Unitary Development Plan (adopted 14th January 2004)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Is the same type document as Westminster's UDP therefore same requirements and objectives</p>	<p>As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.</p>	<p>As above</p>

LB Camden Unitary Development Plan (adopted June 2006)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
Is the same type document as Westminster's UDP therefore same requirements and objectives	As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.	As above
The City of London Unitary Development Plan (6th April 2002)		
Requirement or objectives	Requirements and objectives to be integrated into the SPD	Implications for the SA
Is the same type document as Westminster's UDP therefore same requirements and objectives	As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.	As above
LB Southwark Unitary Development Plan (19th July 1995)		
Requirement or objectives	Requirements and objectives to be integrated into the SPD	Implications for the SA
Is the same type document as Westminster's UDP therefore same requirements and objectives	As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.	As above
LB Lambeth Unitary Development Plan (7th August 1998)		
Requirement or objectives	Requirements and objectives to be integrated into the SPD	Implications for the SA
Is the same type document as Westminster's UDP therefore same requirements and objectives	As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.	As above
LB Wandsworth Unitary Development Plan (August 2003)		
Requirement or objectives	Requirements and objectives to be integrated into the SPD	Implications for the SA
Is the same type document as Westminster's UDP therefore same requirements and objectives	As a neighbouring Borough their UDP objectives need to be taken into account when developing this SPD so that any potential conflict is removed or mitigated. Equally where policy synergy's can exist to maximise the promotion of sustainability and protection of the environment.	As above
'Air Quality Strategy & Action Plan' (2001) and 'Air Quality Strategy & Action Plan: Progress Report' (2005)		
Requirement or objectives	Requirements and objectives to be integrated into the SPD	Implications for the SA
<ul style="list-style-type: none"> • To reduce emissions from the most polluting vehicles by working with the Mayor and London boroughs to implement a low emission zone • To reduce traffic and discourage unnecessary car journeys through traffic control and restraint based parking policies • To promote the use of alternative road fuels such as gas, fuel cells and electricity in general, but especially in council vehicles, contractors vehicles, buses, taxis, light vans. • To promote the development of a refuelling infrastructure for alternative fuels in Westminster and central London • To enforce emissions standards through: the roadside emissions testing programme, and the stationary vehicles offence - working with other London local authorities. • To promote alternative modes of transport to the private car including walking, cycling and public transport • To reduce the impact of development on traffic emissions • To minimise emissions caused by building activities • To minimise emissions caused by the use of buildings • To monitor air quality • To raise public awareness • To work in partnership with others 	The objectives need to be integrated and supported by the plan so that new development has a minimal impact upon air pollution.	Policies that minimise the impact upon air quality need to be identified by the SA.
Local Implementation Plan		
Requirement or objectives	Requirements and objectives to be integrated into the SPD	Implications for the SA
Sets out how Westminster City Council intends to implement the policies set out in the Mayors transport Strategy.	These objectives need to be reflected in the LDF policies as they co-	Need to identify the option that minimises the impact upon the

<p>The objectives are;</p> <ul style="list-style-type: none"> Improving road safety Improving bus journey times and reliability Relieving traffic congestion and improving journey time reliability including through the use of travel demand measures. Improve the working of parking and loading arrangements Improving accessibility and social inclusion on the transport network Encourage walking by improving the street environment, conditions, for pedestrians and through the use of travel demand measures Encourage cycling by improving conditions for cyclists and through the use of travel demand measures Bringing transport infrastructure to state of good repair 	<p>ordinate land use and transport policies</p>	<p>environment while allowing economic development and social inclusion. WCC LIP has had an SEA and so should be in general conformity with this SA</p>
<p>Sustainable Buildings SPG</p>		
<p>Requirement or objectives</p> <p>Advises on the life cycle of building projects including the basic principles of sustainable construction. Key goal is to enable the environmental performance and quality of design of buildings in the city to be improved. Relevant areas and benefits are ;</p> <ol style="list-style-type: none"> Health <ul style="list-style-type: none"> Healthier living and work places Better air flow and circulation internally Warmer on winter Cooler in Summer Less toxicity in building materials Amenity <ul style="list-style-type: none"> Better Design Fit in with needs of local community Greener built environment Environment <ul style="list-style-type: none"> Reduced life cycle impacts Less waste Less energy use Better water quality and drainage Improved air quality Enhanced biodiversity Economic <ul style="list-style-type: none"> Economic instrument Life style marketing Reduced fuel bills Longer building life Enhanced corporate reputation Increased affordability 	<p>Requirements and objectives to be integrated into the SPD</p> <p>The objectives of the SPG should be embraced across the Core Strategy policies so that the impact upon the environment from new development is reduced and social as well as economic consideration are taken into account.</p>	<p>Implications for the SA</p> <p>The SPG objectives will be supported by the SA as it assists in policy selection that contribute to sustainable development.</p>
<p>Design Matters in Westminster City Council</p>		
<p>Requirement or objectives</p> <p>Sets out the councils policies with regards to design of new buildings in Westminster including accessibility, sustainability and context</p>	<p>Requirements and objectives to be integrated into the SPD</p> <p>Need to promote high quality design and materials, sensitive to the local context</p>	<p>Implications for the SA</p> <p>SA objectives should incorporate these themes</p>
<p>Westminster Way- A Public Realm Manual for the City, Westminster City Council, 2004</p>		
<p>Requirement or objectives</p> <p>A manual for design of public realm in Westminster</p>	<p>Requirements and objectives to be integrated into the SPD</p> <p>Use of high quality materials and high standard of design contributing to an accessible, sustainable and attractive public realm, in keeping with the character of the conservation area.</p>	<p>Implications for the SA</p> <p>Need to assess sustainability of materials and contribution of high quality public realm to economic and social as well as environmental objectives</p>
<p>Tourism Plan – Taking London Forward: Westminster’s Charter for Tourism</p>		
<p>Requirement or objectives</p> <p>Sets out how tourism will be supported encouraged and improved across the City of Westminster identifying the strategic issues that need to be addressed to maintain the world class destination.</p>	<p>Requirements and objectives to be integrated into the SPD</p> <p>Policies will need to support the spatial requirements of meeting tourism demands across the city.</p>	<p>Implications for the SA</p> <p>Consider the merits of tourism from a economic and social perspective whilst protecting the environment from the large numbers of visitors to the city.</p>
<p>Economic Development Strategy</p>		
<p>Requirement or objectives</p> <p>Has three key objectives;</p>	<p>Requirements and objectives to be integrated into the SPD</p> <ul style="list-style-type: none"> More business friendly and stimulate enterprise activity in 	<p>Implications for the SA</p> <p>SA needs to select options that support environmental protection, are</p>

<ol style="list-style-type: none"> 1. Supporting Business and Enterprise 2. Business friendly City Management 3. Promoting Employability. 	<p>deprived areas and assist existing business to grow.</p> <ul style="list-style-type: none"> • Stimulate enterprise and encourage entrepreneurship to revitalise localities and provide a route into employment for those out of work. • A clean and safe environment creating the right conditions for businesses to succeed and thrive. • Provide businesses and employers with the skills that they need on their doorstep. • Helping people to overcome barriers in gaining employment 	<p>socially responsible as well as allow economic development.</p>
Open Space SPG		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>The key objectives of the Open Space Strategy to improve the quality, management, accessibility and usage of parks and other open spaces in the City. Provide new facilities where there are deficits in provision and also provide well maintained, quality open spaces which are safe and attractive to all</p>	<p>Open space is important and needs protection as the pressures on land increase through out the city.</p>	<p>Open space is important for quality of life, social facility and so is of major importance to the Plan and the SA. The objectives and actions of the open Space Strategy therefore need to be taken into account.</p>
Nature Conservation Strategy (1997)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Strategy developed to ensure that valuable resource protected for the benefit of everyone in the city, aims are</p> <ol style="list-style-type: none"> 1. Protect existing habitats and create new opportunities for wildlife. 2. Encourage wildlife through the sympathetic management of green spaces. 3. Improve public access to and understanding of nature in the city. 4. Monitor progress. 	<p>Policies need to safe guard and protect and enhance habitats and biodiversity</p>	<p>Nature conservation and biodiversity are key relevant subject areas, which directly need to be address in LDD's and supported by the SA.</p>
'Biodiversity Action Plan' (2000)		
Requirement or objectives	Requirements and objectives to be integrated into the Plan	Implications for the SA
<p>Protect and enhance biodiversity to ensure the city is a pleasant place to live work and visit. The BAP seeks to ensure that the rare continue to thrive and the common remain common.</p>	<p>Policies need to safe guard and protect and enhance habitats and biodiversity</p>	<p>Nature conservation and biodiversity are key relevant subject areas, which directly need to be address Core Strategy policies and supported by the SA.</p>

Appendix 3: Sustainability Appraisal Objectives

Appendix 3 Sustainability Appraisal Objectives

Number	Sustainability Objective	Sub-objective	Indicators
1	Reduce poverty and social exclusion	<ul style="list-style-type: none"> • Improve the economic opportunities for excluded people and communities • Reduce poverty and social exclusion in those areas most affected • Improve affordability to essential services to the home • Improve affordability of housing 	<ul style="list-style-type: none"> • Census levels of deprivation • Proportion of the population living in deprived areas • Proportion of children in low income families • Proportion of people claiming benefits • Proportion of the population of working age in full-time employment • Levels of fuel poverty
2	Improve health and well-being	<ul style="list-style-type: none"> • Improve the health and well-being of the population • Provide, protect and improve health facilities • Reduce health inequalities • Encourage healthy lifestyles • Maximise the safety of streets for pedestrians, cyclists & motorists • Provide facilities for sport and recreation • Provide and ensure access to open space 	<ul style="list-style-type: none"> • Average life expectancy of population • Mortality rates by cause • Working days lost through illness • NHS hospital waiting lists • Access to a GP • Access to a hospital • Levels of health inequalities • Levels of participation in sport and cultural activities • Proportion of journeys on foot or by bicycle • Proportion of school children travelling to school, by mode of transport • Access to green space • Number of pedestrian, cyclists and motorist accidents • Percentage of resident population describing their health as 'not good'
3	Improve availability of decent homes	<ul style="list-style-type: none"> • Reduce homelessness • Increase the range of housing and increase housing choice for all • Increase the affordability of housing for all • Improve the quality of housing 	<ul style="list-style-type: none"> • Levels of homelessness • Proportion of the population living in temporary accommodation • Affordability of housing in comparison to earnings • Levels of availability of good quality housing for all social groups • Housing completion figures • Affordable housing completion figures • Proportion of homes judged unfit to live in
4	Reduce anti-social activity and remove the fear of crime	<ul style="list-style-type: none"> • Improve community safety and establish conditions that discourage crime • Encourage safer environments through • Reduce actual crime levels and fear of crime design • Reduce actual noise levels and noise concerns resulting from anti-social behaviour • Reduce the impact of anti-social behaviour on the environment 	<ul style="list-style-type: none"> • Crime levels • Fear of crime amongst the local and visiting populations • Noise levels and complaints • Litter levels • Number of Anti-social Behaviour Orders (ASBOs) issued • Level of race-related crime
5	Improve sense of community identity and welfare and the quality of where people live	<ul style="list-style-type: none"> • Encourage a sense of community and place, and embrace diversity • Provide, protect and improve religious facilities • Encourage development of and participation in cultural, creative and sporting activity • Support local activities and crafts • Protect, provide and improve community meeting places • Protect and improve sports, play and recreation facilities • Encourage active involvement in local decision making and voluntary activities • Support cross-cultural integration • Improve resident and visitor satisfaction with where they live • Improve the legibility of streets for all pedestrians • Ensure a mix of land uses • Protect and improve cultural provision • Protect and improve provision and quality of open spa • Provide, protect and improve childcare facilities and access to open spaces • Protect and improve provision of wildlife, and improve access to it where appropriate 	<ul style="list-style-type: none"> • Levels of engagement in community activities • Levels of engagement in voluntary activities • Levels of resident satisfaction, participation and sense of well-being • Proportion of the population that are or feel they can be involved in local decision making • Proportion of the population who feel their local area is a place where people from different backgrounds and communities can live together harmoniously • Proportion of residents who are satisfied with their neighbourhood as a place to live • Mix of appropriate land uses • Number of cultural events held • Number and type of cultural facilities available; • Additions and improvements made to open spaces • Number, accessibility and affordability of child care facilities; • Levels of biodiversity • Areas of wildlife protected

6	Reduce unemployment and Improve education and skills	<ul style="list-style-type: none"> • Reduce unemployment both short and long-term • Facilitate the creation and sustaining of employment, particularly where appropriate for the local population • Provide opportunities for those most in need of employment • Help improve work/life balance • Help improve earnings • Increase opportunity for rewarding and satisfying employment • Provide, protect and improve education facilities • Facilitate development of local skills • Develop and improve opportunities for lifelong learning 	<ul style="list-style-type: none"> • Overall levels of unemployment • Proportion of people of working age who are in work • Proportion of people of working age who are unemployed • Proportion of lone parents, long-term ill and disabled people who are economically active and claiming benefits • Proportion of ethnic minorities in full-time employment • Average hours worked by people in employment • Average earning for full-time employees • Qualifications achieved by the population • Proportion of the population with no qualifications • Proportion of the adult population participating in learning
7	Increase accessibility to essential services and community facilities	<ul style="list-style-type: none"> • Improve access to buildings and ease of movement for all • Improve interchanges between streets and buildings, with regard to levels, widths and obstructions • Encourage developments that improve the quality of the spaces between buildings • Improve access between housing, jobs, services and amenities • Improve provision of public transport 	<ul style="list-style-type: none"> • Percentage of residents within walking distance (500m/15mins) of key local services (post office, food shop, GP, primary school) • Childcare spaces available per 1,000 population • Levels of new retail floorspace • Availability of public transport
8	Improve air quality	<ul style="list-style-type: none"> • Reduce direct emissions of local air • Reduce combustion of natural resources pollutants • Encourage and facilitate the use of low emission technology and fuels 	<ul style="list-style-type: none"> • Number of days per year of air pollution • Levels and concentrations of pollutants in the air • Levels and concentrations of emissions • Levels of use of low emission technology and fuels • Planning permissions granted for solar panels and alternative energy sources
9	Reduce contributions to climate change and vulnerability to impacts, including flooding	<ul style="list-style-type: none"> • Reduce direct emissions of greenhouse gases • Reduce emissions of ozone depleting substances • Encourage use of renewable energy to minimise use of finite resources • Minimise non-renewable energy consumption • Protect against storm damage • Protect against potential river flooding and flash flooding • Reduce the risk of subsidence • Protect the microclimate 	<ul style="list-style-type: none"> • Levels of CO2 emissions • Levels of renewable and non-renewable energy use • Thermal efficiency of the building stock • Energy efficiency of road passenger travel • Energy efficiency of rail passenger travel • Energy efficiency of freight distribution • Depletion of fossil fuels • Depletion of ozone • Sale/use of ozone depleting substances • Frequency of fluvial flood events • Development in the floodplain • Amount of land affected by subsidence • Works undertaken for flood prevention • Works undertaken to protect from storm damage • Amount of fossil fuels used
10	Protected and enhance open space and conserve soil resources and quality	<ul style="list-style-type: none"> • Reduce use of minerals, materials and resources • Use minerals, materials and resources more efficiently • Ensure that contamination of land is prevented or remedied 	<ul style="list-style-type: none"> • Levels of minerals, materials and resources • Levels of contaminated land • Net loss of soils to development • Levels of soil quality • Amount of contaminated land remediated
11	Minimise production and harmful effects of waste	<ul style="list-style-type: none"> • Minimise use of resources and materials • Conserve manufactured resources • Reduce waste generation • Reduce hazardous waste • Encourage more efficient use of resources • Encourage use of renewable materials and resources • Encourage use of once-used and recycled materials • Enable recovery of energy from waste • Ensure careful and efficient collection and storage of waste • Enable collection of used resources and materials so they can be recycled • Enable environmentally satisfactory disposal of waste 	<ul style="list-style-type: none"> • Levels of materials consumption per person • Levels of waste generated in total and per household • Levels of material recycling in total and per household • Destination of all waste and that just from households i.e. recycling, composting, used to recover energy, landfill • Source of materials used in total and just within households i.e. recycled, re-used • Levels of hazardous waste • Compliance with EU Landfill Directive

12	Protect, maintain and enhance biodiversity, flora and fauna and improve water quality	<ul style="list-style-type: none"> • Protect designated nature conservation sites of national, metropolitan and local significance • Protect and enhance habitats and buildings that benefit wildlife, such as gardens, trees, rivers, water bodies and wild spaces • Protect and provide priority habitats • Protect and provide for priority species • Protect and enhance open spaces • Prevent pollution of water bodies and courses • Improve the quality of water bodies and courses 	<ul style="list-style-type: none"> • Achievement of Biodiversity and Species Action Plan targets at National and Westminster levels • Changes in priority habitats • Changes in populations of priority animal species • Trends in plant biodiversity • Population of wild birds • Number of habitat enhancement projects in open spaces • Levels of marine life in water bodies and water courses • Levels of dangerous substances found in water • Levels of nutrients found in water • Levels of pathogens in water • Amount of dissolved oxygen in water • Number of significant pollution events in the river Thames • Number of incidents of accidental/deliberate release of pollutants into water bodies
13	Conserve and enhance the historic environment and the quality of landscapes and townscapes	<ul style="list-style-type: none"> • Encourage repair, maintenance and protection of historic buildings and structures • Protect public art, monuments, statues and their settings • Protect and enhance sites, features and areas of cultural value • Preserve and enhance historic parks and gardens • Protect and conserve the archaeological resources • Improve the legibility of streets for all • Improve ease of movement for all • Ensure high quality visual streetscape and buildings • Preserve and enhance the character and fabric of conservation areas • Reduce street clutter • Ensure clean streets 	<ul style="list-style-type: none"> • Loss or damage to listed buildings and their settings • Loss or damage to scheduled ancient monuments and their settings • Loss or damage to historic parks and gardens and their settings • Loss or damage to historic landscapes and their settings • Percentage of conservation area demolished or otherwise lost • Loss or damage to historic view lines/strategic views and vistas • Levels of loss or damage to public art, monuments, statues and their settings • Measures in place to protect and conserve archaeological resources • Measures to protect historic view lines/strategic views and vistas • Level of street legibility • Quality of visual streetscape • Changes in character of the conservation areas • Proportion of new homes built on previously developed land • Proportion of vacant land and properties • Proportion of streets that are clean/litter free • Improvements to the number/types of street furniture and signage • Number of street obstructions/obstacles
14	Reduce the need to travel and the use of the car.	<ul style="list-style-type: none"> • Encourage a reduction in travel and use of alternatives to powered transport • Encourage use of energy efficient transport modes • Reduce the need to travel, especially by private car • Encourage walking and cycling and other forms of sustainable travel • Integrate new development schemes with public transport • Provide infrastructure to enable efficient, optimal use of public transport, accessible to all • Reduce the impact of service and delivery vehicles on congestion and levels of pollution • Reduce congestion and minimise the intrusion of all vehicles in working and residential areas • Reduce traffic noise • Encourage use of sustainable river transport facilities • Optimise access for emergency vehicles on all routes • Encourage greater use of renewable cleaner fuels • Reduce the impact of passenger vehicles on congestion and levels of pollution 	<ul style="list-style-type: none"> • Volume of traffic on all roads • Volume of traffic on principle roads • Volume of heavy goods vehicles • Level of congestion • Level of traffic noise • Passenger travel by modes • Reasons for travel mode choices • Level of integration of new development schemes with public transport • Leisure trips by mode of transport • Proportion of trips made using alternative powered transport • Proportion of trips made using energy efficient transport modes • Level of investment in and use of sustainable water transport facilities • Levels of CO2 emissions • Levels of renewable and non-renewable energy use • Energy efficiency of road passenger travel • Energy efficiency of rail passenger travel • Energy efficiency of freight distribution • Depletion of fossil fuels • Amount of fossil fuels used • Number of Section 106 agreements for contributions to, or infrastructure provided for improving public transport
15	Require energy efficient buildings and provide for sustainable sources of water supply	<ul style="list-style-type: none"> • Ensure design of buildings and structures are resource efficient • Ensure buildings and structures are designed to be energy efficient • Ensure buildings and structures adaptable for re-use 	<ul style="list-style-type: none"> • Proportion of new buildings considered to be energy efficient • Proportion of building stock adaptable for re-use • Proportion of building stock safe-guarded for re-use
16	Encourage sustainable economic growth	<ul style="list-style-type: none"> • Ensure that the strength of the economy is maintained and further sustainable growth is enabled and accommodated • Assist business development 	<ul style="list-style-type: none"> • Change in the number of businesses in the area • Levels of productivity • Indicators of competitiveness

		<ul style="list-style-type: none"> • Enhance competitiveness • Promote growth in key sectors • Promote tourism • Encourage indigenous business • Encourage inward investment • Make land and property available for business development • Promote innovation and enterprise 	<ul style="list-style-type: none"> • Survival rates of new and established businesses • Diversity of economic sectors • Relative employment/output growth in different economic sectors • Long term economic growth of GDP (gross domestic product) • Number of new businesses opening and existing ones closing • Growth of local business by number of employees and turnover • Investment levels from UK owned companies • Investment levels from overseas owned companies • Amount of employment land available • Number of business applications granted planning consent • Image indices derived from consultation with businesses and the public • Volume of new investment
17	Reduce impacts from noise	<ul style="list-style-type: none"> • Reduce generation of noise from all activities • Reduce generation of noise from all premises • Reduce emissions of noise from transport related activities • Reduce emissions of noise into properties 	<ul style="list-style-type: none"> • Levels of noise generated from commercial premises and activities • Levels of noise generated from residential premises • Levels of noise emitted from transport related activities • Levels of noise imitated into properties • The number of noise complaints received
18	To ensure the plan does not negatively effect existing Westminster residents		

Appendix 4: Appraisal of strategic Options

Sustainability objectives	Option 2	Option 1	Comments and time-frame of effects
To create cohesive, inclusive and safe communities, with appropriate levels of social and community facilities.	?	0	By taking positive action to record and highlight the best within the local environment and encourage local communities to participate in the process, this may have minor positive impacts in terms of strengthening community identification with and pride in Westminster's historic environment, which may contribute to more cohesive communities.
To reduce the fear of crime and actual crime.	?	0	The document will take positive action in promoting a well-designed and attractive environment which will have minor positive benefits in the medium term in terms of enhancing the image of the area and the community's sense of identity
To ensure the provision of appropriate housing types to meet homeless, affordable, intermediary, over crowding and family unit demands.	0	0	The recording of important views will not have any impacts on housing provision.
To promote and improve health and well-being.	+	0	The document will take positive action in promoting a well-designed and attractive environment, which will have minor positive benefits in the medium and long term on the quality of the environment. This contributes to a sense of well-being.
To reduce greenhouse gas emissions and support climate change adaptation	0	0	The recording of important views will not have any impacts on greenhouse gas emissions.
To require the application of sustainable design and construction in all new developments and refurbishment	0	0	The recording of important views will not have any impacts on sustainable design and construction.

of existing buildings.			
To minimise flood risk, promote sustainable urban drainage and protect surface and ground water quality.	0	0	The recording of important views will not have any impacts on flooding.
To protect, enhance and create environments that encourages and support biodiversity.	+	0	The recording of important views will not have significant impacts on biodiversity, although the recognition of the importance of trees and open spaces within views may have minor positive benefits in the medium term.
To improve air quality.	0	0	The recording of important views will not have any impacts on air quality.
To reduce the impact of noise.	0	0	The recording of important views will not have any impacts on noise
To reduce the need to travel and use of private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport.	0	0	The recording of important views will not have any impacts on reducing the need to travel.
To reduce waste production and increase recycling and recovery of all waste.	0	0	The recording of important views will not have any impacts on waste production, recycling and recovery
To protect and enhance the historic environment and architectural, archaeological and cultural heritage.	++	0	Guidance on the protection of significant views will have a major positive impact in the medium term on the ability to conserve and enhance Westminster's historic environment.
To enhance the public realm and street environment.	++	0	The views document will also focus on the importance of the foreground and the importance of public realm, signage etc within views and potential public realm enhancements and will have a positive impact in the medium term.

To protect, enhance and seek opportunities to increase open space throughout the borough.	+	0	The guidance will have a positive impact in the medium term on protection of existing areas of historic open space, although it will not increase open space.
To ensure equality of opportunity and improve opportunities for education, training and employment.	0	0	The recording of special architectural and historic interest of the area will not have any impacts on equality of opportunity and training.
To maintain economic diversity, increase local opportunity and support sustainable economic growth.	+	0	By recording and highlighting the architectural and historic interest of the conservation area there is likely to be a minor positive effect in the long term on the enhancement of the area's image for business and tourism.

Appendix 5: Summary of the impacts of the draft SPD

SA Objectives	Criteria for appraisal	Score	Comment / observation: effects and mitigation
1. To create cohesive, inclusive and safe communities with appropriate levels of social and community facilities	Improve the economic opportunities for excluded people and communities	0	Westminster's conservation policies, make a positive contribution to Westminster's economic performance in general, by creating an attractive, desirable place in which to live, visit and do business. It is likely, though not proven, that this improvement to economic performance improves opportunities for excluded people throughout Westminster
	Reduce poverty and social exclusion in those areas most affected	0	IMD scores vary greatly, ranging from 10.7 – 76 across Westminster. It is not anticipated the SPD will affect this situation.
	Improve affordability of essential services to the home	0	The SPD is unlikely to have an impact on affordability of essential services
	Improve affordability of housing	0	There is little opportunity for the SPD to influence the availability of affordable housing.
2. To promote and improve health and well-being	Improve the health and well-being of the population	+	A high quality environment, such as that promoted by the SPD, has a positive effect on health and wellbeing.
	Provide, protect and improve health facilities	0	The SPD is unlikely to have an impact.
	Reduce health inequalities	0	Encouraging protection and enhancement of important views is unlikely to have an impact on health inequalities
	Encourage healthy lifestyles	0	It is not anticipated that the SPD will have any impact on encouraging healthy lifestyles
	Maximise the safety of streets for pedestrians, cyclists & motorists	0	Whilst the SPD encourages reduction in street clutter where this affects the foreground of views, which may increase accessibility for pedestrians, it will have little impact on cyclists and motorists, and overall is considered to have a neutral impact.

	Provide facilities for sport and recreation	0	It is not anticipated that the SPD will have any impact on provision of leisure facilities
	Provide and ensure access to open space	+	The SPD recognises the importance of open space to the character of Westminster.
3. To ensure the provision of appropriate housing types to meet homeless, affordable, intermediary, over crowding and family unit demands	Reduce homelessness	0	The SPD will have no impact, either positive or negative, on homelessness.
	Increase the range of housing and increase housing choice for all	0	It is not considered the SPD will have any significant impact on housing choice.
	Improve the quality of housing	+	The SPD should help contribute to ensuring high design quality of both new and existing buildings, ensuring these sit happily in their context. and maintain or enhance the quality of Westminster's environment.
4. To reduce both the fear of crime and actual crime	Improve community safety and establish conditions that discourage crime	+	A high quality, well designed and maintained environment is less likely to be the location for crime. A good mix of residential and employment uses ensure that surveillance of the area is constant.
	Encourage safer environments through good design	+	The SPD seeks to promote the highest standards of design throughout Westminster which may indirectly contribute to safer environments.
	Reduce actual crime levels and fear of crime	0	It is unlikely the SPD will have any impact on actual crime or fear of crime.

	Reduce actual noise levels and noise concerns resulting from anti-social behaviour	0	The SPD is not likely to have significant effects in this area. Improving the quality of places can help to reduce anti social behaviour, however.
	Reduce the impact of anti-social behaviour on the environment	0	It is unlikely the SPD will have any significant impact. Improving and maintaining the quality of the built environment can help to reduce anti social behaviour, however.
5. To reduce greenhouse gas emissions and support climate change adaptation		0	No significant effects are anticipated as a result of the SPD.
6. To ensure equality of opportunity and improve opportunities for education, training and employment	Facilitate the creation of sustainable employment particularly where matched to the needs of the local population	0	The economic benefits of a well maintained historic district could include encouraging investment. This is not proven.
	Provide opportunities for those most in need of employment	0	Whilst the conservation policies contained in the SPD may encourage inward investment and other economic benefits, this is unlikely to have specific impacts on those most in need.
	Help improve work/life balance	0	The SPD is unlikely to have any impact.
	Help improve earnings	0	The SPD is unlikely to have any impact on earnings.
	Increase opportunity for rewarding and	0	The SPD is unlikely to have any impact on local employment

	satisfying employment		
	Provide, protect and improve education facilities	0	The audits are unlikely to have any impacts on educational facilities
	Facilitate development of local skills	0	The audits are unlikely to have any impacts on local skills, though the national conservation agenda, of which conservation area appraisals such as the Broadway and Christchurch Gardens audits form a part, is driving a resurgence in craft skills.
	Develop and improve opportunities for lifelong learning	0	No significant benefit Whilst not intended as an educational document, the SPD may be useful to those pursuing local studies, as well as planning and conservation students.
7. To enhance the public realm and street environment		++	The SPD encourages the preservation and enhancement of the historic public realm, referring to the importance of public realm including specifically historic street furniture and historic street surfaces. Other improvements to the public realm are promoted in the SPD, including reduction of street clutter and preservation of important street trees
8. To improve air quality	Reduce direct emissions	0	The SPD is unlikely to have an effect on emissions
	Reduce combustion of natural resources pollutants	0	The SPD is unlikely to have an effect on combustion of natural resources pollutants .
	Encourage and facilitate the use of low emission technology and fuels	-	By encouraging the protection and enhancement of the historic environment, the SPD may prevent certain visually intrusive forms of technology such as the installation of on site micro generation. Rooftop plant is discouraged, as is the visual clutter caused by pipes, wires and flues. Intrusive elements at roof level or on facades are also discouraged. However, with careful siting it may often be possible to install low emission technology. An appendix to the SPD

			could provide information on sustainable technologies that would not have an impact on the appearance of conservation area and effects of this will be monitored.
9. To protect, enhance and seek opportunities to increase open space throughout the borough	Protect and enhance open space	+	The SPD specifically encourages the protection and enhancement of historic open spaces. Effects should therefore be positive.
	Use minerals, materials and resources more efficiently	0	No impacts are anticipated
	Ensure that contamination of land is prevented or remedied	0	No impacts are anticipated
10. To reduce waste production and increase recycling and recovery of all waste.	Minimise use of resources and materials	0	No impacts are anticipated
	Conserve manufactured resources	0	No impacts are anticipated
	Reduce waste generation	0	The SPD will have no impact on waste generation
	Reduce hazardous waste	0	The SPD will have no impact on hazardous waste
	Encourage use of renewable materials and resources	0	No impacts are anticipated
	Encourage use of	0	To a certain extent, the continuing reuse of historic building stock

	once-used and recycled materials		supports the reuse of building materials.
	Enable recovery of energy from waste	0	No impacts are anticipated
	Ensure careful and efficient collection and storage of waste	0	No impacts are anticipated
	Enable collection of used resources and materials so they can be recycled	0	No impacts are anticipated
	Enable environmentally satisfactory disposal of waste	0	No impacts are anticipated
11. To protect, enhance and create environments that encourage and support biodiversity	Protect designated nature conservation sites of national, metropolitan and local significance	?	The SPD specifically encourage the protection and enhancement of open spaces. Whilst not supporting biodiversity as such, this may have minor positive benefits but overall the effect is likely to be neutral.
	Protect and enhance habitats and buildings that benefit wildlife, such as gardens, trees, rivers, water bodies and wild spaces	+	The SPD encourages the protection of gardens, street trees and private trees where these are prominent in views.

	Protect and provide priority habitats	0	No impacts are anticipated
	Protect and provide for priority species	0	No impacts are anticipated
	Protect and enhance open spaces	+	The SPD identifies the value of open space to the character of the area.
12. To protect and enhance the historic environment and architectural, archaeological and cultural heritage	Encourage repair, maintenance and protection of historic buildings and structures	++	The SPD emphasises the importance of historic buildings and structures within views and encourages their protection.
	Protect and enhance public art, monuments, statues and their settings and sites	++	The SPD includes views of well known monuments and statues and encourages their protection.
	Preserve and enhance historic parks and gardens	++	The SPD includes views of many historic parks and gardens and encourages their protection.
	Protect and conserve the archaeological resources	0	No impacts are anticipated
	Improve the legibility of streets for all	++	The SPDs seek to protect important views, especially views towards landmarks, which contribute to the legibility of streets and spaces.

	Improve ease of movement for all	0	The SPD makes some recommendations with regards to clutter and street surfaces, which will make a positive contribution to ease of movement. Overall the effects are likely to be neutral.
	Ensure high quality streetscape and buildings	++	The identification of the special character of existing buildings and views will enable high quality, sensitive design of any new development, ensuring the overall high quality of the streetscape.
	Preserve and enhance the character and fabric of conservation areas	++	Many of the views are within Conservation Areas and the SPD will help preserve and enhance their special character.
	Reduce street clutter	+	The SPD identifies street clutter as a negative feature within certain views.
13. To reduce the need to travel and use of private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport	Encourage a reduction in travel and use of alternatives to powered transport	0	No significant impacts are anticipated
	Encourage use of energy efficient transport modes	0	No significant impacts are anticipated
	Reduce the need to travel, especially by private car	0	No significant impacts are anticipated
	Encourage walking and cycling and other forms of sustainable travel	0	No significant impacts on sustainable travel are anticipated

	Integrate new development schemes with public transport	0	No impact likely as a result of the SPD.
	Provide infrastructure to enable efficient, optimal use of public transport, accessible to all	0	No significant impacts on public transport infrastructure are anticipated
	Reduce the impact of service and delivery vehicles on congestion and levels of pollution	0	No significant impacts on service and delivery vehicles are anticipated
	Reduce congestion and minimise the intrusion of all vehicles in working and residential areas	0	No significant impacts on congestion are anticipated
	Reduce traffic noise	0	The SPD has no impact on traffic noise
	Encourage use of sustainable river transport facilities	0	The SPD has no impact on sustainable river transport
	Optimise access for emergency vehicles on all routes	0	The SPD has no impact on access for emergency vehicles
	Encourage greater use of renewable cleaner fuels	0	The SPD has no impact on renewable cleaner fuels

	Reduce the impact of passenger vehicles on congestion and levels of pollution	0	The SPD has no impact on passenger vehicles
14. To minimise flood risk, promote sustainable urban drainage and protect surface and ground water quality	Protect against storm damage	0	The SPD has no impact on storm damage
	Protect against potential river flooding and flash flooding	0	The SPD has no impact on river flooding or flash flooding
	Reduce the risk of subsidence	0	The SPD has no impact on the risk of subsidence
	Prevent pollution of water bodies and courses	0	The SPD has no impact on pollution of water bodies and courses
	Improve the quality of water bodies and courses	0	The SPD has no impact on the quality of water bodies and courses
15. To maintain economic diversity, increase local opportunity and support sustainable economic growth	Ensure that the strength of the economy is maintained and further sustainable growth is enabled and accommodated	?	Protection and enhancement of Westminster's historic environment and strengthening its distinctive identity may have a positive impact on the local economy, encouraging future investment.

	Assist business development	0	Protection of Westminster's special character may assist businesses in marketing.
	Enhance competitiveness	0	No major impact on competitiveness
	Promote growth in key sectors	0	Improvements resulting from conservation policy may help to promote growth in tourism – see below.
	Promote tourism	+	The historic environment is one of Westminster's most valuable tourist assets. The maintenance of this environment in good order, and protection of buildings from demolition make a key contribution to the economic life of Westminster
	Encourage indigenous business	0	No impact on indigenous business
	Encourage inward investment	+	An attractive and high quality environment may well help to encourage inward investment.
	Make land and property available for business development	0	The emphasis of the SPD on conservation of existing heritage assets means that it may have a minor negative effect on property available for development. However, this may encourage adaptive re-use of existing building stock.
	Promote innovation and enterprise	0	No impact on innovation and enterprise
16. To reduce the impact of noise	Reduce generation of noise from all activities	0	No impact on emissions of noise from activities
	Reduce generation of noise from all premises	0	No impact

	Reduce emissions of noise from transport related activities	0	no impact on emissions of noise from transport related activities
	Reduce emissions of noise into properties	0	No impact
17. To require the application of sustainable design and construction in all new developments and refurbishment of existing buildings	Ensure design of buildings and structures are resource efficient	0	No impact
	Ensure buildings and structures are designed to be energy efficient	0	No impact
	Ensure buildings and structures adaptable for re-use	+	The SPD encourages the reuse of existing buildings.

Statement of Adoption