

Draft Infrastructure Delivery Plan

City of Westminster

November 2024

1. Introduction

1.1 Infrastructure underpins our daily lives

Infrastructure is the physical assets, services and facilities needed to support and sustain a community of people. Infrastructure underpins all activities of our daily life: including utilities systems which bring electricity and water to your home to turn on your lights and run a bath, the social infrastructure that provides the library you visit when you're out for the day, and the transport systems that take you from your home to that library and back again.

Most of the time, when infrastructure functions properly, we scarcely notice it – it is only when the provision is not sufficient or of inadequate quality that we recognise the extent to which we rely on it, for example, when the tube is running late, or we cannot make a call on our mobile because the cellular network is overwhelmed. Conversely, it is clear that sufficient provision of higher quality infrastructure increases opportunities and improves quality of life, such as the outcomes for children who benefit from a strong education system or the health and well-being of a population served by a robust health service.

As Westminster's population grows, existing infrastructure must be maintained and improved, and new infrastructure must be provided, where necessary, to develop the city sustainably to achieve increasingly positive outcomes.

1.2 Strategic vision of infrastructure

Infrastructure provision presents choices: the type, quantity, quality, and location of infrastructure reflect values and priorities about the community and its future.

This Draft Infrastructure Delivery Plan (IDP) sets out the strategic vision for infrastructure in which infrastructure is used to help deliver Westminster City Council's (the Council's) broader ambitions and priorities. All infrastructure decisions are framed by the Council's strategic priorities, including the pledge to become a Net Zero council by 2030 and Net Zero city by 2040, the commitment to reducing inequalities, and the strategies to deliver a Fairer Westminster.

1.3 Definition of infrastructure

The term infrastructure covers a range of different facilities and services. It ranges from softer infrastructure, such as schools, libraries, and GP surgeries to hard infrastructure, such as utilities, cycle lanes and waste management facilities.

The Council adopts a broad, holistic and flexible definition of infrastructure:

> Infrastructure is the framework of physical assets e.g. facilities and equipment, services, and systems needed to support and sustain a community of people.

This broad definition encompasses any public asset, service, or system which facilitates an individual's or group's ability to: maintain a modern dwelling; utilise energy, potable and waste water, waste services, and communications technology; travel; communicate and access information; engage in household, social, communal, civic, artistic, cultural, or leisure activities; maintain and improve their physical and mental health, primarily through access to health care and physical activity; be kept safe from harm, including harm to their person and their possessions presented by crime and environmental threats such as pollution, weather, and flood risk; educate themselves; engage in leisure activities; and access multi-functional green and blue spaces and other natural features.

This Draft IDP will identify infrastructure requirements across the short, medium, and long-term time horizons, within the context of the City Plan. The goal is to establish a single source of information for all types of infrastructure.

The infrastructure requirements identified in this Draft IDP were developed following a review of available documents and engagement across the Council, external infrastructure providers, and Westminster's Neighbourhood Forums.

1.4 The need for a replacement IDP

The Council's current IDP[1], adopted in May 2021, was prepared as supporting evidence to the City Plan, which was adopted in April 2021. However, there have been important

[1] See Westminster's Infrastructure Delivery Plan (May 2021)

developments since the current IDP's adoption that supports the production of a replacement IDP. Firstly, the council has embarked on a Partial Review of its City Plan, which includes site allocations setting out guidance of how some key underutilised sites can be developed. Secondly, the council has set out ambitious new strategic directions, inclusive of but not limited to Net Zero Carbon and equalities - which requires the development of a strategic vision for infrastructure which aligns with them. Lastly, infrastructure planning and delivery at WCC is now guided by a governance structure which formally provides a collaborative and transparent approach to infrastructure planning and delivery decision-making which facilitates open discussion and debate across the key services in the Council. In addition, the City Plan Partial Review is supported by the parallel production of a replacement IDP.

1.5 Purpose of the Draft IDP

This Draft IDP is a multi-faceted document which will be used by different stakeholders for different purposes. It is at once a statement of a strategic vision and a working document.

This document aims to:

- Set out the Council's **strategic vision for infrastructure planning and delivery**, including how infrastructure provision will help to deliver corporate priorities and strategies;
- **Inform infrastructure planning by identifying the What, Where, and When of all infrastructure requirements**, including information on cost, phasing, funding, and delivery partners and other stakeholders;
- **Inform infrastructure funding decisions**, including Section 106 (S106) negotiations, Capital Programme allocations (including Strategic CIL), and Neighbourhood CIL application decisions;
- **Evidence the City Plan** by identifying infrastructure needs and supply, both for the City Plan Partial Review including the proposed site allocations and a planned Full Review of the City Plan; and
- **Form part of the evidence base for any future review of the Community Infrastructure Levy (CIL) charging schedule** by determining the 'infrastructure funding gap' required to substantiate the CIL charge.

It is the preeminent Council document on infrastructure. This Draft IDP is informed by a wide range of adopted strategies, plans, and reports, and should also inform production of similar documents in future.

The draft IDP will be a live document. The strategic vision will be reviewed annually and will be subject to targeted updates where necessary for the draft IDP to remain relevant and to continue to underpin corporate strategies and priorities. The schedule of projects will also be reviewed annually and be subject to targeted updates to reflect new projects and programmes, updates to existing projects, and relevant contexts. Broader updates or even a replacement IDP will be produced where needed to inform future reviews of the City Plan and CIL Charging Schedule. If revisions are required to reflect changes in context, the updated/replacement document will be subject to Westminster City Council's formal governance processes.

1.6 How to use this document

This Draft IDP is broadly composed of three main sections: the narrative text, including the strategic vision; the infrastructure types chapters; and the Infrastructure Delivery Schedule.

The narrative text sets out the background of the draft IDP, including policy and other context and the methodology used to produce the draft IDP. The key element of the narrative text is the strategic vision, which sets out how infrastructure will help deliver the Council's broader strategies and priorities. The narrative text includes: the introduction; strategic vision for infrastructure; context, both in terms of conditions such as growth and policy frameworks; and methodology.

The infrastructure types chapters summarise information for each type of infrastructure treated in the document. Overview of existing infrastructure provision and requirements to accommodate growth during the City Plan period. Each chapter includes an introduction to the infrastructure type, the current situation within Westminster, and a summary of planned and future provision. A list of selected projects for that type is also included for illustrative purposes, along with a map showing the spatial distribution of the projects.

The Infrastructure Delivery Schedule is a technical section comprised of a detailed list of all infrastructure projects and programmes identified as infrastructure requirements.

2. Strategic Vision for Infrastructure

2.1 Infrastructure to deliver Council strategies and priorities

This Draft IDP sets out a strategic vision for infrastructure in which infrastructure is used to help deliver Westminster City Council's (the Council) broader ambitions and priorities. All infrastructure decisions are framed by the Council's strategic priorities, including the pledge to become a carbon neutral council by 2030 and carbon neutral city by 2040, the commitment to reducing inequalities, and the strategies to deliver a Fairer Westminster. It further sets out that infrastructure provision must be sufficient to meet the needs of our current populations, and that future infrastructure needs must be planned to support the levels of growth set out in our local development plan.

2.2 Prioritisation

The infrastructure requirements identified in this draft IDP include infrastructure which is necessary to support the projected growth of the City. Given that funding is a finite resource, the Council must prioritise some projects for funding over others.

Projects are also prioritised to reflect their relative importance for enabling new development and achieving sustainable communities. Identified projects are prioritised into one of the following categories to reflect their relative importance for enabling new development and achieving sustainable communities:

- **Critical Infrastructure:** Critical in enabling new housing and commercial developments, without which new developments would be significantly delayed or considered unacceptable in planning terms
- **Essential Infrastructure:** Essential for mitigating the direct impacts of developments and to avoid the unacceptable overuse of existing facilities or services in the area
- **Important Infrastructure:** Important for achieving sustainable communities and would contribute towards people's health and social wellbeing or enhancement of the natural environment
- **Desirable Infrastructure:** Aligned to placemaking objectives without being essential for development to come forward. Desirable infrastructure is unlikely to directly relate to population fluctuations or growth. However, it is still likely to deliver clear benefits for Westminster. It therefore should be considered for CIL funding when justified.

The City Plan is a key guide to determine in which prioritisation category a project sits. For example, the Site Allocations included in the City Plan Partial Review includes an existing hospital site, where a key requirement of future development is a new hospital that better meets current and future healthcare needs. The provision of that infrastructure would therefore be considered Critical.

Once categorised, projects should be further prioritised via various mechanisms which allow assessment against other Council plans and strategies. For example, all infrastructure projects seeking Council funding through the annual Budget process through the capital programme, must provide information in response to a series of questions set out in the Capital Project Spending Request. Information requested includes the relative deprivation of the community served by the project, efforts taken for the project to reach net zero carbon, and other considerations, primarily informed by the Fairer Westminster Strategy. Prioritisation methods should be designed to reflect the needs of the function for which infrastructure is being prioritised, but all methodologies should reflect the strategic approach to infrastructure set out in the draft IDP by valuing projects which maximise benefits in terms of both direct benefits of the infrastructure and broader benefits.

2.3 Fairer Westminster Strategy

The key principles by which infrastructure projects are prioritised reflect the Fairer Westminster Strategy. Fairer Westminster is the Council's vision for building a city that supports and celebrates all of our communities. The strategy is underpinned by the following five pillars, which are used to inform decision-making:

1. **Fairer Communities**: Making Westminster a healthier and equitable place for all our residents.
2. **Fairer Housing**: Increasing affordable housing and making sure our tenants and lessees are satisfied.
3. **Fairer Economy**: Building a strong, diverse and growing economy that benefits all residents and businesses.
4. **Fairer Environment**: Working to become a net zero council by 2030, and a net zero city by 2040.
5. **Fairer Council**: Having our council become more transparent and visible to our residents.

To deliver on the plan to build a Fairer Westminster, the Fairer Westminster Delivery Plan sets out what priority work the Council has planned, including delivery targets for each of the Council's key ambitions.

This draft IDP supports these priorities by providing a comprehensive and joined-up view of infrastructure requirements across the Council and external providers, to inform decision making regarding infrastructure funding within the wider strategic framework, set primarily by the Fairer Westminster Strategy. The projects identified in this draft IDP are the vital 'building blocks' that will support the delivery of a Fairer Westminster, and the use of CIL in funding these projects is an important consideration in the CIL spending strategy.

2.4 Intersectionality of outcomes

Infrastructure provision should always consider achieving efficiencies, not just in terms of costs, populations served, and other traditional considerations, but also in terms of helping to achieve the Council's broader strategies and ambitions.

Infrastructure should seek to further as many priorities as possible. For example, a public realm scheme could feature a small planting which encourages pedestrians to take a slightly longer yet more scenic route, in turn helping the public realm improvement also encourage active travel (and thereby reducing health inequalities) whilst also providing green and blue infrastructure in the form of a natural planter drainage system.

2.5 Infrastructure planning and delivery at Westminster

The city's infrastructure is planned for and supplied by a patchwork of providers and operators, from the private, public and not for profit sectors, each operating within different statutory and legislative frameworks. The council has different levels of control over each of these, but we can create a framework within which the different providers work efficiently and to maximise the benefits of their own provision. The council will use all of the mechanisms at our disposal, such as planning control and funding, to encourage infrastructure provision to align with the strategic approach set out in this document.

The draft IDP identifies all infrastructure that will be provided within the city, even where WCC does not control it.

The draft IDP reiterates the principle set out in the National Planning Policy Framework[2] and elsewhere that growth much be supported by infrastructure. Infrastructure providers must ensure that current and planned provision is sufficient to support current levels and expected growth of population and jobs.

Whilst the draft IDP, with reference to the Fairer Westminster Strategy and other key strategies and plans, identifies and prioritises infrastructure, tough decisions must be taken. Infrastructure funding is a finite resource and developer contributions have not yet bridged the identified infrastructure funding gap. As a result, funding is directed to priority projects via a thoughtful governance process.

The Council has a robust and inclusive governance structure to provide strategic oversight and decision-making on infrastructure. This structure provides a formal and transparent way of ensuring that all infrastructure planning and delivery decisions have a route for approvals and a forum for discussion and debate across the key services in the Council. It is highly collaborative, bringing together voices and expertise from across the council to enhance knowledge and therefore improve quality of decisions.

The Infrastructure Delivery Board (IDB) provides strategic overview of all strategies, planning, and funding decisions related to infrastructure. It also acts as the link and interface with politicians. The IDB is a high-level group is comprised of Directors and Executive Directors from all teams involved in planning and delivering infrastructure.

The Infrastructure Working Group (IWG) is the initial gateway for all infrastructure planning and delivery issues. The group is comprised of officers, primarily principals and Heads of Service, from all teams involved in planning and delivering infrastructure. The IWG is convened monthly which allows it to take detailed consideration of all issues, including project-level discussions for example to unblock barriers to delivery and to identify funding.

The Capital Review Group (CRG) is a Finance-convened group with broad responsibility for council spending, but is important for the infrastructure governance structure because of its role in prioritising the council's Capital Programme and in agreeing the use of Strategic Community Infrastructure Levy (SCIL) and Section 106 contributions funding. It is comprised of select Cabinet Members and key Executive Directors and other officers attend meetings. The role of CRG is to manage the WCC General Fund (GF) and Housing Revenue Account (HRA) capital programmes. CRG is the gateway for

[2] NPPF paragraph 20 requires local plans to align growth with infrastructure provision.

the capital programme and ensures that the Council's limited resources are used appropriately. It is responsible for overseeing both the fixed and rolling five-year capital programme and will include all projects including those up to 100% externally funded by partner organisations. It manages the funding and borrowing requirements for the net Capital Programme, which includes a substantial number of infrastructure projects.

2.6 The draft IDP and the City Plan

The draft IDP serves as an evidence base for the City Plan, which is the Local Plan document for Westminster. It demonstrates how Westminster has and/or will provide the infrastructure required to support the level of growth set out the City Plan. It also includes broader infrastructure requirements necessary to support wider growth plans as referred to in section 3.2 Population and Growth.

The draft IDP is also designed to incorporate and integrate the infrastructure needs specifically and generally arising from the City Plan Partial Review. For example, the infrastructure required to support the Site Allocations is identified in the Infrastructure Delivery Schedule. This includes site-specific infrastructure issues, such as the need for relocated or replacement infrastructure at the Grosvenor Sidings, Westbourne Park Bus Garage, and St Mary's Hospital sites, and the need for site-specific infrastructure for example at Royal Oak. In addition to site-specific infrastructure, the draft IDP directs infrastructure providers to plan for all infrastructure needs required to support growth in population and workers planned for those sites. The infrastructure requirements set out in the Infrastructure Delivery Schedule reflect current levels and planned growth, including growth accommodated by the Site Allocations and the policy changes proposed in the city plan partial review.

3. Context

3.1 Setting the scene for infrastructure requirements

Infrastructure needs are driven by changes to Westminster's population, in terms of its size and composition, and demands on its built environment by residents, workers, and visitors, such as the need for more housing, different types of employment spaces, and other uses. As Westminster's population grows and changes, existing infrastructure must be maintained and improved, and new infrastructure must be provided where necessary to develop the city sustainably.

Infrastructure needs are similarly informed by policy. The interrelationship between growth and development with policy is a key determiner of infrastructure requirements. For example, a residential development with an expected child yield will create increased demand on local playgrounds, but the exact level of provision of child play space is calculated based on the minimum levels set out in the London Plan and supplementary guidance.

This section sets out the population and policy context of Westminster's infrastructure needs.

3.2 Population and Growth

A key function of the draft IDP is to identify the amount and type of infrastructure required to deliver the growth proposed in the City Plan and as set out in the London Plan.

Westminster's current population is 205,0872[3], which is expected to grow by 79,213 by 2040, with a projected population of 284,300 as identified in the City Plan. Given Westminster's position at the heart of central London, the resident population also swells on a daily basis with the influx of workers and visitors.

Much of the city falls within the Central Activity Zone, where continued commercial growth is of national economic importance, and existing and growing residential communities make positive a contribution towards the vibrant mix of uses.

[3] See Facts and figures about Westminster

The city's North West will see economic regeneration, and the renewal of Church Street / Edgware Road and Ebury Bridge estates will increase local populations and bring renewed vitality.

Key growth targets set out in the adopted City Plan are for at least 20,685 new homes to the period 2040, and at least 63,000 new jobs. These headline targets for growth are not being revisited through the City Plan Partial Review, which only looks to support the delivery of more truly affordable housing, prioritise retrofit of existing buildings over their demolition and rebuild, and introduce a small number of site allocations. The included site allocations focus on providing guidance of how high quality developments that respond to their surroundings can be unlocked, and do not assign specific targets in terms of number of homes or jobs to each site.

3.3 Policy Contexts

National Guidance

In July 2021 the Government published its revised National Planning Policy Framework (NPPF) [4], and further changes were recently proposed in July 2024. The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared housing and other development plans can be produced. The NPPF refers to infrastructure provision as an integral means of delivering the development needs established in Local Plans. It requires Local Planning Authorities (LPAs) to plan with anticipation for development and infrastructure required in the area.

LPAs are mandated to plan for and, where feasible, assist with delivering infrastructure required to support development. Local authorities are to identify the infrastructure required, the sources of funding, the providers, and infrastructure's overall relation to the anticipated phasing of development. Any major infrastructure required should be identified within the Local Plan and specific policies.

Local Policy Context

Under the adopted City Plan (and in accordance with the London Plan), Westminster aims to increase its housing supply by 20,685 units by 2040. New housing will be provided in a variety of locations, including through major regeneration schemes in the Housing Renewal Areas at Church Street and Ebury Bridge, as part of mixed-use

[4] See National Policy Framework

developments in the Opportunity Areas of Victoria and Paddington, and as part of the continued intensification of the Central Activities Zone, North Westminster Economic Development Area and in and around our town centres.

The West End, along with the Opportunity Areas at Paddington, Victoria, and Tottenham Court Road, provide the main opportunities for significant office growth. Over the City Plan period, an increased demand for other commercial spaces, including hotels, retail, and leisure developments is also expected, meaning Westminster will require additional commercial floor space of various types.

As part of the City Plan Partial Review, site allocations are included for: St Mary's Hospital, Westbourne Park Bus Garage, land adjacent to Royal Oak, and Grosvenor Sidings. As key underutilised sites with scope for intensification, development across these sites will make a positive contribution towards the cities needs for new homes, jobs, and infrastructure improvements in sustainable locations.

Westminster's CIL Spending Policy Statement[5] sets local policies and priorities to guide the allocation of CIL funds. It constitutes local policy to inform CIL allocations by the Council. It supersedes the earlier Spending Policy Statement (adopted November 2017). In addition to the requirements and restrictions of national legislation and regulations, all CIL spending decisions must regard this document. Westminster's CIL addresses the cumulative impact of development and growth on the City. In concert with other planning obligations, it is a key source of funding projects which provide and enhance the infrastructure required to support growth.

CIL must be spent on providing, improving, replacing, operating, or maintaining public infrastructure needed to support development or growth. If necessary, CIL can provide new infrastructure or repair or update existing infrastructure to support development or growth. It can also be used for anything else concerned with addressing the demands that development or growth places on an area. CIL is allocated by the Council on the project's merits and managed by the legal requirements governing Council decisions and the requirements of the legislation and regulations governing CIL, its administration, application, and reporting requirements. Further to these requirements, CIL is allocated in line with the policies and priorities set out in local policy.

[5] See Westminster's CIL Spending Policy Statement (adopted 17 October 2022)

Under the updated CIL regulations[6] that came into force in September 2019, Infrastructure Funding Statements (IFS) have replaced CIL Regulation 123 Lists as the tool through which projects are identified for CIL funding and will support the implementation of this Draft IDP. The IFS is published annually, summarising all financial and non-financial developer contributions to S106s and CIL within Westminster. It includes a statement of infrastructure projects that Westminster City Council intends to or may be wholly or partly funded by CIL. The IFS also sets the Council's governance arrangements for allocating CIL and S106.

This draft IDP and accompanying Delivery Schedule were produced in alignment with the IFS and strategic priorities identified in national policy, relevant legislation, and local priorities in the City Plan.

[6] See amended CIL Regulations 2019

4. Methodology

4.1 Identification

The infrastructure requirements set out in this draft IDP were developed following a review of available documents and engagement across the Council, with Westminster's Neighbourhood Forums and with external infrastructure providers between August and September 2023, followed by review processes in January and August/September 2024.

Between August and September 2023, a series of meetings were held with lead staff across various Council services and external service providers responsible for planning, funding, and delivering infrastructure in Westminster to support the development of this Draft IDP and accompanying Delivery Schedule.

An initial round of engagement was undertaken to gather insights on existing infrastructure needs and supply, including delivery context, planning standards, planned provision, key issues and risks, and supporting evidence. A second round of engagement was then undertaken to identify the infrastructure required to support growth, including reviewing requested submissions detailing infrastructure programmes and strategic projects both underway and planned, that support the City Plan. Submissions received were collated into an Infrastructure Delivery Schedule, which forms part of this Draft IDP.

In January and again in August/September 2024, contributing providers were invited to comment on draft versions of the draft IDP. The intention was to provide a further opportunity to review and update information about their projects as well as the language used to describe those projects.

Projects are included in the schedule if they have been formally identified in adopted policy or strategy documents, or are in the Council's capital programme or otherwise included in team's programmes of works, or have been identified by an external infrastructure provider. Given the relatively long plan period and varying levels of details in sources, not all information about every project is known at the time of publication. As planning for a project progresses, new or revised details, particularly regarding phasing and costs, will be updated in the Infrastructure Delivery Schedule.

4.2 Categorisation (infrastructure type)

Infrastructure categorisation is useful for infrastructure planning, monitoring, and reporting purposes but is not intended to be exclusionary. The following categories considered in this Draft IDP align with strategic priorities identified in the NPPF, relevant legislation, priorities identified in the City Plan and those adopted by Westminster for CIL spending purposes. The scope of this Draft IDP includes projects relevant to[7]:

- Education
- Health & Care
- Public Transport
- Highways, Traffic & Parking
- Active Travel
- Culture & Tourism
- Leisure & Community Facilities (including Libraries)
- Green & Blue Infrastructure (including Flood Risk Management)
- Public Realm
- Emergency Services
- Utilities & Waste
- Digital Infrastructure

4.3 Rationalisation and Prioritisation

The methodology set out in 4.1 produced a list of approximately 650 projects. The list was too detailed to be accessible and helpful. A rationalisation exercise was undertaken, in which small projects were amalgamated into programmes, duplicate projects were removed, and projects submitted without sufficient justification (such as being identified in a published strategy or in an agreed programme) were scrutinised and many removed, amongst other to clean up the list.

Projects costed at £5,000 or less were identified for additional scrutiny. The intention was to consolidate lower-value schemes into programmes wherever possible.

This approach aimed to keep the Infrastructure Delivery Schedule a manageable size instead of an impenetrably long list, whilst ensuring that project costs were accounted for, to support the robustness of the infrastructure funding gap. The compilation of smaller projects into programmes also provides projects flexibility to expand provision of the scheme objectives to other sites as needs change in the real world.

The outcome of the rationalisation exercise was a far more accessible list of approximately 250 projects.

[7] The list of infrastructure types relevant to the updated Draft IDP is not exclusive; it will be amended and/or expanded based on close engagement with council officers and service providers.

Methodologies to prioritise projects, to reflect their urgency for supporting development and sustainable communities as well as their role in delivering Council strategies and priorities, was produced. These methodologies are set out in sections 2.2 and 2.3.