

Draft City Plan 2019 – 2040 - Response Overview

Throughout the Development Plan review process (The London Plan and the City Plan), New West End Company has sought feedback from our 600 Members' and as a result we have focused on four key aims, which will best enable the West End to grow and compete globally. New West End Company and our Members' support the broad objectives of the City Plan but also have specific concerns, about whether some key aspects will be deliverable. Our full response contains all our collective comments, but this overview highlights some key concerns and direct feedback raised from our Members' for each of our four key asks. We believe that these key concerns are also echoed by other industry bodies, such as the Westminster Property Association and London First, of which New West End Company is a member.

1. **Key Ask One – That the City Plan provides the level of flexibility of uses in the West End to enable appropriate growth to take place through the lifetime of the Plan.**
 - We welcome that the Plan supports greater flexibility, allowing complementary uses to enable the International Centre to evolve in response to global consumer trends. But our Members' have expressed two key areas of concern:
 - Flexibility should not be restricted unnecessarily by prohibiting more than two consecutive non-A1 use frontages. The International Centre should be allowed up to three consecutive non-A1 frontages, as proposed for the rest of Westminster. The amount of non-retail use above ground floor level should be unrestricted.
 - Change of use from A1 in the International Centre should not be dependent on evidence of unsuccessful marketing of a unit for 18 months. This undermines the argument of actively encouraging complementary uses in the International Centre to respond to global retail trends. It would also result in retail units in the International Centre, being empty and unsightly for 18 months before an alternative use could even be considered. If 18 months' proof of unsuccessful marketing is required, then this should apply to existing marketing evidence in the wider local area, not new evidence of just the particular unit.

2. **Key Ask Two – That the City Plan provides sufficient new commercial space to accommodate agreed job growth targets with a supporting infrastructure.**
 - The Plan has ambitious jobs targets which need a significant net increase in commercial space to accommodate them. Our Members' question whether the commercial growth anticipated is sufficient to accommodate the jobs growth targets. We are then concerned that policies on height and affordable housing, will prevent delivery of this level of new commercial space.
 - Height restrictions – the Plan allows for up to 4 additional storeys on Oxford Street (and up to 2 throughout the rest of the International Centre) to meet additional commercial space requirements. But Policy 42, prohibiting tall buildings in the West End, defined as over 30 m, prevents this from being achievable (Policy 42F says "Proposals for tall buildings outside of the areas identified in clause E¹ will not generally be acceptable"). We believe these two policies are not compatible. We suggest that either the West End is added to the locations where tall buildings are acceptable or that the definition of a tall building is amended to allow for the additional floors proposed in the West End.
 - Affordable housing in new commercial developments – the proposed requirement that net new commercial development over 1,000 sq m should include between 15% and 35%² affordable housing on-site, could freeze much commercial development throughout the West End, because of the impact on viability of new developments and concerns about constraints on future development if housing is included within the commercial mix.
 - The International Centre is excluded from this on-site housing requirement in the text of the Plan and supporting documents, but this needs to be clarified and included in Housing Policy 10. If new development in the International Centre must include financing for up to 35% affordable housing off-site, this will affect viability which our Members' believe will restrict the amount of new commercial development.
 - In light of the apparent conflict between the policies on commercial growth, tall buildings and affordable housing requirements, we on behalf of our Members', would like to see the Council's evidence of the combined impact of these policies on the ability to deliver sufficient additional commercial space to accommodate the Council's job growth targets.

3. **Key Ask Three – That the City Plan promotes a high-quality physical environment and encourages a dynamic range of experiences.**
 - We welcome the Plan's support for high quality public realm and greater experiences in the West End and are encouraged by moves to create a Management Plan fit for an International Centre.

4. **Key Ask Four – That the City Plan defines the geographical extent of the West End International Centre to enable greater policy flexibility.**
 - We fully support the principle of a new geographic definition of the International Centre and welcome the City Council's approach. We believe this provides opportunities for new national and local policies, specifically for the International Centre (e.g. Sunday trading, street management, enhanced environment).

¹ The Paddington Opportunity Areas, Victoria Opportunity Areas, Marylebone flyover / Edgware Road junction and the Housing Renewal Areas

² 1,000-1,499 sq m, 15%; 1,500-1,999 sq m, 25%; 2,000-2,749 sq m, 35%