

COVENT GARDEN

capco

Westminster City Council
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

Sent by email to: planningpolicy@westminster.gov.uk

18 January 2021

Dear Sir / Madam,

Westminster City Plan (2019-2040) Main Modifications Consultation Representations on behalf of Capital & Counties

Thank you for the opportunity to comment upon the Main Modifications proposed to the Westminster City Plan 2019-2040. Please accept this letter as Capital & Counties formal response to the Main Modifications consultation which summarises our general support for a number of the modified policies and highlights a couple of areas where amendments would be welcome.

Capital & Counties is the majority landowner in Covent Garden and over the past 14 years, we have invested over £1 Billion across the District through the curation of highest quality residential, retail, restaurants, culture and environments. We have undertaken sensitive restoration and conversion works to heritage buildings, delivered major development projects, and made substantial investment in the public realm, both in terms of physical public realm and place-making enhancements and also the management and stewardship of the District. Our retail tenants are curated of the highest quality such that the District is globally renowned for its retail function, tenants and environment, alongside the culture and leisure offer.

There are, however, major structural changes taking place in the retail industry as retailers struggle to address threats from internet retailing, business rates and changing customer requirements and expectations. Furthermore, of course, the challenges of the pandemic throughout 2020 has been particularly acute for the retail sector. In Covent Garden, vacancy levels are at their highest for the past decade.

In this challenging context, we fully support the changes throughout the Plan to provide additional flexibility through references to the new Use Class Order, the opportunity this provides for a wide range of uses within Class E, and the revised policy wording which supports multi-functional areas to shop, work and spend leisure time. This is also reflected in the new policy wording in relation to promoting active frontages and uses serving visiting members of the public (and omission of the specific requirement for 18month marketing evidence) which we fully support. These changes are a particularly important, necessary and welcome shift in policy to allow flexibility for changes of use to other town centre uses, and efficient re-occupation of vacant units, to ensure that high streets and centres remain vibrant and active.

We would also like to emphasise that hotels have a very important role to play in supporting the retail and tourism / cultural function in Covent Garden and across the West End. The change of use from offices to hotels is restrictive, requiring vacancy and marketing to be demonstrated showing no interest in all other Class E uses, education or community uses, before hotel use can be considered.

CAPITAL & COUNTIES CG LIMITED

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GENERAL PARTNER AND NOMINEE OF CAPITAL & COUNTIES CGP

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We consider that this policy should be criteria based particularly for secondary office stock to allow a balanced judgement to be taken.

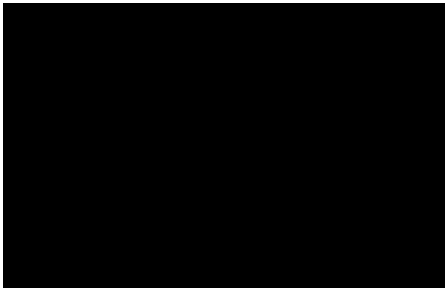
Therefore, with exception of the point above, we support the changes to Policies 14 and 15 included within Main Modifications MM16 and MM17, as well as the number of new references within supporting text to securing the long term sustainability of retail / town centre environments, adapting to the challenges and supporting, beyond Class E, other town centre uses such as pubs and drinking establishments, exhibition, cultural and leisure uses which can all help support the future success of the key clusters of commercial activity, including Covent Garden.

In relation to Design and Townscape (Policy 41 and MM40) we note the substantial changes to this policy. It is particularly important that the Covent Garden District is able to facilitate growth and intensification in one of the most accessible locations in central London. We support the policy change to Clause E which seeks to provide sufficient flexibility for roof extensions where they do not impact adversely on heritage assets – there is an important balance to be struck with all of our development projects across the District within a sensitive heritage context. We also welcome the broader text amendments at paragraph 41.12 supporting larger extensions, where appropriate in commercial locations of varied townscape context. We are disappointed to see omission of the final sentence which previously made specific mention of more than one storey of commercial floorspace in CAZ Retail Clusters, such as Covent Garden, and request that this is reinstated to be clear that the Council would support this form of development, where appropriate, in this location.

Overall, we are very supportive of the changes made to the Plan throughout the Examination process and, in general, support the Main Modifications as published. The flexibility presented by the new Use Class Order, and the full reflection of this in the new City Plan policies, is fully supported, necessary and welcome in order to enable sustainability of town centres for the long term.

We trust that our comments within this letter can be considered as part of the Main Modifications consultation.

Yours faithfully



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