



<b>ORGANISATION</b>	<b>London First</b>
<b>RESPONDENT</b>	<b>79</b>
<b>MATTER</b>	<b>3: The Spatial Strategy &amp; Spatial Development Priorities</b>

## **POLICY 1: WESTMINSTER'S SPATIAL STRATEGY**

1. We support the overarching objectives of the spatial strategy set out in Policy 1. The strategy covers all the necessary issues and is in general conformity with the London Plan and national planning policy.
2. Our concerns in respect of the draft City Plan (the Plan) relate to the extent of its ambition for growth, how that ambition is expressed, and the detailed policies that seek to deliver the spatial strategy. Specifically: the strategy for economic growth is not ambitious enough; there are development management policies in the Plan that undermine the Plan's ability to achieve the levels of growth that Westminster needs; and the Plan's delivery relies on a number of Development Plan Documents which have not yet been released. Our support for the spatial strategy is subject to these considerations.

## **POLICY 2: SPATIAL DEVELOPMENT PRIORITIES: WEST END RETAIL AND LEISURE SPECIAL POLICY AREA AND TOTTENHAM COURT ROAD OPPORTUNITY AREA**

### **19) Does Policy 2 adequately and effectively deal with the full range of relevant issues?**

3. Yes, we consider that Policy 2 covers the full range of issues required, having regard to the definition of the West End Retail and Leisure Special Policy Area (WERLSPA) in the draft new London Plan Intend to Publish version December 2019 (the London Plan).

4. We welcome the inclusion of Policy **2D**, which prioritises a diverse evening and night-time economy and enhanced cultural offer, in addition to retail and leisure activities.

**21) What is the basis for the designation and boundaries of the West End Retail and Leisure Special Policy Area, the West End International Centre and the Tottenham Court Road Opportunity Area? Are the areas covered appropriate and justified?**

5. We do not raise any objections to the boundary drawn around the WERLSPA. It would be helpful if Policy 2 provided greater differentiation between the purpose and vision for the WERLSPA compared to the rest of the CAZ.
6. We support the designation and definition of the West End International Centre, however, the Plan should set out a clearer vision for the International Centre at the borough level as this is very high level in the London Plan.

**23) Is the policy sufficiently clear in terms of the scale and nature of development envisaged?**

7. Policy **2A** sets a WERLSPA priority for “*Significant jobs growth through a range [of] commercial-led development including retail, leisure, offices and hotel use*”. Meanwhile **2B** requires “*The realisation of growth targets for the area identified in the London Plan*”. The London Plan only provides growth targets for the Tottenham Court Road Opportunity Area within the WERLSPA, not the wider area.
8. Paragraph **2.7** of the Plan states that the WERLSPA is anticipated to absorb much of Westminster’s future commercial growth, however there is no indication of the actual level of growth envisaged and Policy **2A** does not contain any specific metrics or targets. The West End Good Growth Report commissioned jointly by the Greater London Authority and Westminster City Council (Arup, November 2018) is referenced. This study projected a gross increase in 124,000 jobs across the West End over the period 2018 to 2041. It should be noted that the West End study area for the Arup report includes parts of the London Borough of Camden (c10% of the land area) and there are also some minor variations in the boundary for the Westminster part of the study area compared to the WERLSPA. However, it is significant to note that both the Arup study area and the WERLSPA consistently exclude the Paddington and Victoria Opportunity Areas. The Arup report envisages that the 124,000 jobs would be delivered through a range of commercial development, including retail, food and drink uses, hotels, arts, culture and entertainment, and offices.

9. We believe that a pro-rata jobs target could readily be determined for the WERLSPA part of the West End and included in Policy 2. This would make the policy more effective because it would provide a metric against which delivery of Policy 2 could be monitored. Being mindful of the slight variation in the Westminster boundary noted above, as a guideline Arup calculate that the Westminster part of their study area would generate 97,000 jobs of the 124,000 total over 2018 to 2041. If this is adjusted for the Plan's timeframe (21 years instead of 23 years) this would suggest that a jobs target for the WERLSPA could be in the region of around 89,000 jobs for the period 2019 to 2040.
10. Specifically, in relation to the Tottenham Court Road Opportunity Area, the growth targets set by the London Plan could be more ambitious. In any event, targets should not be viewed as a ceiling. We have suggested an amendment in response to Q25 below to make it clear that the targets should be viewed as a minimum.
11. Furthermore, the Oxford Street District part of the WERLSPA has greater capacity to accommodate growth compared to the wider WERLSPA, through additional height and intensification. This is acknowledged in the Plan at paragraph 2.8, but it warrants acknowledgement within Policy 2 itself as a new 2H.

## 25) Are any modifications necessary for soundness?

1. We support the Council's Proposed Main Modification **PS/S/01** to Policy **1A(5)** for protecting and enhancing uses of international and/or national importance.
2. Policy **2A** should be amended as follows:
  - A. Significant jobs growth through a range of commercial-led development including retail, leisure, offices and hotel use **to provide at least [TBC] jobs.**
3. Policy **2B** should be amended as follows:
  - B. The realisation of growth targets for the area identified in the London Plan **as a minimum.**

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