

WESTMINSTER CITY PLAN 2019-2040 – EXAMINATION IN PUBLIC - RESPONSE TO INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

MATTER 3 (THE SPATIAL STRATEGY AND SPATIAL DEVELOPMENT PRIORITIES)

Policy 1 (Westminster's Spatial Strategy)

Question 11) What is the approach to other areas not identified and is this clear?

1. Given the importance of Oxford Street within Westminster and also London more widely, British Land is concerned that the City Council's approach to growth on Oxford Street is unclear.
2. The Plan does not address the level of growth and densification that Oxford Street and the Oxford Street District can potentially provide. The District has characteristics and capacity that distinguish it from the wider West End Retail and Leisure Special Policy Area.
3. Paragraph 2.8 of the Draft City Plan states that "*along with an improved public realm, the built form of Oxford Street offers scope for increased height to deliver a range of commercial floorspace that complements the retail offer and provides modern workspace - reinforcing its role as a key commercial centre*". British Land welcomes this statement, but considers that this should be addressed within Policy 1, Policy 2 (or a new policy) as it directly relates to the scale and nature of development that is anticipated.

Policy 3 (Paddington Opportunity Area)

Question 30) Should Policy 3 specify the amount of housing and employment expected in the Paddington Opportunity Area over the plan period?

4. We consider it is vitally important for the City Plan to set targets to meet and exceed the homes and jobs targets as set out in the London Plan. There is a particular step change in the employment targets in the Draft New London Plan, which have increased by 260% (from 5,000 to 13,000) when compared with the adopted London Plan. Such development can make a significant contribution to realising the associated economic, social and environmental objectives of this policy.
5. We note the draft City Plan already references (within part A of the policy and para 3.4 of the supporting text) the homes and jobs targets as set out in the new London Plan.
6. Whilst the housing targets for the Paddington Opportunity Area identified in the Draft New London Plan (1,000) remains as per the current adopted version, the employment targets in the Draft New London Plan have increased by 260% (from 5,000 to 13,000). We therefore consider there needs to be a particular focus on how this significantly increased employment target can be realised.

Question 31) Is Policy 3 consistent with other policies in the City Plan, particularly Policy 42?

7. We have serious concerns that draft City Plan policies 10 and 42 in particular could constrain the ability to meet the identified objectives for the Paddington Opportunity Area as set out in policy 3. This could result in opportunities for new employment generating development not being optimised and the associated objectives of this policy not being realised therefore.
8. These points are considered further in our specific responses to the relevant matters, issues and questions in relation to City Plan policies 10 and 42.

Question 32) What progress has been made towards the growth targets for the Paddington Opportunity Area and how will future growth be delivered?

9. Research undertaken in 2019 to support our current planning application for the office led redevelopment of 5 Kingdom Street at Paddington Central indicates that the current pipeline of development Paddington (under construction schemes as well as consented but as yet unimplemented schemes) in could deliver circa 8,600 operational jobs. This is still 4,400 jobs short of the draft overall target.
10. We note the latest Westminster authority monitoring report (March 2020) identifies 599 dwellings as already being under construction as of March 2019 (which falls within the timescale of the draft City Plan). This indicates the residential target (which remains unchanged from the previous city plan) is likely to be achieved comfortably and that the key challenge is likely to be achieving the employment target which is increased by 260%.

Question 33) Are the proposed modifications necessary for soundness? Are any other modifications necessary?

11. We consider policy 3 should specifically state the mixed-use requirements of Policy 10 will be applied flexibly where proposals address the development priorities listed in parts (a)-(f) of this policy. Otherwise this potentially compromises the ability to achieve these stated objectives in practice.