

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

MATTER 5 (ECONOMY AND EMPLOYMENT)

Policy 14 (Supporting Economic Growth)

Question 1) What is the evidence in relation to future jobs growth and the need for employment floorspace and does the policy reflect this?

1. As per the position set out in our response to the 'Regulation 19' consultation, British Land agrees with the response from the Westminster Property Association (WPA), which it has developed further to address these issues, matters and questions.
2. We echo in particular the view of the WPA that there is a need for higher office floorspace and office based employment targets based on the Arup study on Good Growth in the West End, conducted for the City Council and Mayor of London.
3. Whilst the medium and long term impacts of the COVID19 pandemic on the office market in Westminster are uncertain at this stage. A range of scenarios may arise including a reduction in occupation densities.

Question 2) How will additional floorspace be delivered and what role will the City Plan and the Site Allocations DPD play?

4. We have significant concerns about how the additional office floorspace will be delivered given the approach and requirements set out in Policy 10 in respect of the delivery of affordable housing alongside office accommodation. The WPA analysis has shown that in a large number of examples, where office development is proposed, it becomes unviable as a result of the requirements proposed by Policy 10.
5. If sufficient new floorspace is not generated, then the jobs target will not be achieved.

Question 4) Is the approach to the loss of floorspace set out in Parts D and E of the policy justified and effective?

6. As set out in our response to the 'Regulation 19' consultation, Paddington Central has been developed over the last twenty years and over that time it has transitioned from a business park to an integrated part of the city that the general population (and not just office workers within the campus) chooses to visit, move through and enjoy. A key factor in driving that transition is the conversion of ground floor office space to complementary active uses which contribute to placemaking and provide valuable local amenities which diversify the business environment, such as retail and leisure uses.
7. Whilst converting ground floor spaces in office buildings can result in some loss of office space, it is typically not the most attractive office space within a building and has the opportunity to contribute to activating and enhancing the vitality of streets and spaces if used in a more public way.
8. We consider that as currently drafted, the proposed policy approach as set out in part (D) of this policy is too constraining in terms of the circumstances under which it identifies a net loss of office floorspace as being acceptable. Whilst we are very supportive of a strategic policy approach which positively promotes new office floorspace and employment growth in the Central Activities Zone, an overly strict and inflexible approach to proposals entailing office losses that does not fully take account of other relevant considerations and scheme benefits could lead to potentially adverse unintended consequences. This could run contrary to other defined policy objectives. We therefore consider this requires this element of the policy require further modifications in order to be effective as set out below.

Question 5) Are the proposed modifications necessary for soundness? Are any other modifications necessary?

9. We note the proposed modifications to part (D) of policy 14 provide a degree of additional flexibility in relation to town centres when compared to the draft 'Regulation 19' version of this policy. We consider this flexibility should be extended to the wider Central Activities Zone (CAZ) so as to cover areas such as Paddington Central, where active frontages can make a positive contribution to the character, vitality and viability of an area.
10. Our response to the 'Regulation 19' consultation identified and commented on the proposed trigger for future review of this policy (Monitoring Framework – Key Performance Indicator 5). For delivery of office floorspace across the CAZ and opportunity areas, the trigger point identified in the 'Regulation 19' version of the City Plan was a net reduction in floorspace. We note the minor alteration, as set out in the latest Schedule of Modifications (April 2020) to reword this trigger as the 'trend in net reduction of floorspace'.
11. We still however consider there is a disconnect between this approach and the proposed approach for monitoring delivery of housing (Monitoring Framework – Key Performance Indicator 1). The proposed trigger for review of housing delivery is 10% below target for three consecutive years. We do not consider the proposed modifications to Key Performance Indicator 5 fully addresses our earlier concerns. For policy 14 to be effective in facilitating the achievement of identified targets for jobs and floorspace growth, the relevant trigger for review should be the same as the housing delivery trigger (i.e. 10% below target for three consecutive years).

Policy 15 (Town Centres, High Streets and the CAZ)

Question 10) Is the approach to the protection of A1 uses and the introduction of other uses justified and sufficiently flexible?

12. We consider that the protection of Class A1 accommodation does not respond to modern day shopping habits and requirements. Given the advent of online shopping, which has significantly grown in recent years, as so to generate footfall, town centres need to provide the experiential shopping environments that consumers have sought and those that cannot be replicated virtually.
13. As set out by the WPA, this policy would continue to prevent a wider offer at ground floor level. This is particularly pertinent in respect of Oxford Street and retaining its position as a key shopping / visitor destination given the wide shopping, leisure and entrainment offer that is provided by other shopping destinations such as Westfield. We consider that as the policy does not take into account other reasonable alternatives uses, it is unsound and not justified.