

#### **Matter 4 – Housing (Relevant Policies 8-13)**

##### **Q.6 Should the City Plan set out a housing requirement for designated areas (Para 65 of the NPPF)?**

Whilst para 65 of the NPPF requires that “strategic policies should ... set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”, we strongly consider that the Central Activities Zone and more specifically the West End of London should not be the subject of specific allocated housing targets over the plan period.

Whilst residential can and should continue to be an acceptable land use within these central areas, it must be recognised that the CAZ is where economic and leisure activities are specifically directed, and that residential uses are not always appropriate in such locations, which will naturally limit the numbers of units that can be accommodated there.

St Christopher’s Place has benefitted from having the flexibility to adapt the use of existing buildings to the changing retail environment and consumer spending patterns, to the evolving demands of office occupiers to provide appropriate accommodation across the range of uses, which has included new residential accommodation on the upper floors of our buildings.

The Conservation Areas and historic buildings often limits significant redevelopment of much of the West End. Having flexibility to adapt buildings has underpinned the economic sustainability of buildings for generations as uses have ebbed and flowed. This will continue to have even greater importance as the country recovers from the COVID-19 pandemic, and any fixed residential targets may ultimately impact upon this flexibility and may result in vacant buildings.

##### **Q.28 In overall terms is the policy in general conformity with the London Plan? How would the London Plan and City Plan interrelate on this issue in terms of dealing with specific proposals?**

The policy text refers to all liable residential developments providing 35% of units as affordable. Notably, the draft London Plan seeks to calculate the same requirements based on habitable rooms.

The City Plan will only conform with the London Plan if a habitable room calculation is adopted rather than being based on units. Affordable housing has been assessed using habitable rooms as the preferred approach across London Boroughs for several years. It is also a better assessment of the quantum of housing being delivered, particularly when housing mix may differ between tenures.

##### **Q.30 What is the basis for seeking affordable housing contributions from office and hotel developments in principle? Is the approach justified, consistent with national policy and in general conformity with the London Plan?**

It is recognised that Westminster has historically had policies in place which require affordable housing contributions from commercial schemes (although not from hotel development). These policies have had mixed success over the years and the Council have previously adapted this policy to reflect market patterns – however these policy changes have often been too slow in coming online to have the desired effect.

It would be preferable if the City Plan simply conformed with the London Plan and National Policy and removed the requirement for affordable housing contributions from office and hotel developments – specifically in the CAZ. This again would provide developers with certainty moving forward, and would facilitate the economic development that is required within the CAZ to drive London’s economy forward which is now even more relevant in a post pandemic context. It is often the requirement of providing affordable housing for small/medium size office developments which makes schemes unviable and delays redevelopment.

The policy as drafted also does not reference viability testing. Viability considerations are a core component of the NPPF, particularly identified in paragraphs 57, 67, 85 and 122. To be considered 'sound' against the NPPF, the policy should include clear references to financial viability.

In addition, further clarity is required regarding the unit of measurement to which the floorspace increase applies (NIA, GIA, GEA?).

**Q.37 What is the basis for the approach towards family-sized housing and is this justified?**

BMO REP appreciates the objective of the Plan to deliver more homes particularly for families in Westminster. We would question however, whether it is appropriate to deliver family sized homes within the CAZ. The CAZ plays a particular role in supporting the night-time economy and commercial growth. It has busy main roads, poorer air, less schools, lacks open space (a great degree of the CAZ fell under 'Areas of Wildlife, Open Space and Play Space Deficiency in the old City Plan) and it will be challenging to provide private amenity space as sought under Policy 13 (which we address later).

We question if the CAZ as a whole is an area really appropriate for family housing or indeed an area where families would want to live. BMO REP has always found larger size units, particularly over 2 beds, to be of low demand despite the housing pressures. In addition, the provision of residential accommodation within our portfolio is mainly through conversion and not new build. This naturally results with 1 or 2bed dwellings which work around the existing building fabric and floorplates.

It should also be noted that the direction of travel within the London Plan (2019) (Intend to Publish version) recognises that many families do live in two-bedroom units and this should be taken into account when assessing the needs that different sized units can meet.

The current wording of the policy applies a blanket approach to unit mix, and while it is easier to accommodate the mix in larger redevelopment schemes, it is not clear how this policy applies to 'minor' 1-9 unit schemes bearing in mind that within the CAZ, historic buildings may limit the size of unit that can be provided, or the ability to provide a policy compliant mix of unit sizes and/or standards regarding cycle and amenity space.

Furthermore draft London Plan Policy H12 states that 'Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.' This policy appears to go against this principle