

West End Partnership

Draft Replacement London Plan (DRLP) Representations

This consultation response reflects the areas of shared interest identified by the West End Partnership. Member organisations of the West End Partnership have also provided their own responses to the consultation.

Introduction

1. Over the past five years, extensive work has been undertaken by Westminster City Council, the London Borough of Camden, the GLA family, local residents, London First, the WPA, the West End BIDS and other key stakeholders, to explore the potential of the West End and to ensure that this area's unique character continues to be actively promoted and enhanced. This has led to the formation of the West End Partnership (WEP)¹ and a long term Vision 2015-2030 for the West End.²
2. The Vision 2015-2030 reflects twin goals. The first is to maintain good growth and to harness the benefits that good growth can bring and the second is to maintain and enhance its mixed commercial, cultural and residential character. A series of principles has been established as to how the West End should evolve over the period to 2030 – see Appendix 1. These are closely aligned with the Mayor's six Good Growth policies.
3. Whilst welcoming the Mayor's publication of the DRLP and the opportunity to comment on the consultation draft, the Partnership has a general concern that the DRLP is not a strategic document and strays into too much detail. Such detail is best addressed at the local level through the respective local and neighbourhood plans. If the proposed level of detail is to be retained then the Partnership suggests some changes as set out below.
4. Firstly, the Partnership welcomes the identification of the West End 'cluster' within the CAZ Diagram (Fig 2.16) but suggests that it is amended so that it relates to the definition adopted by the WEP. This would ensure a consistent definition of the West End and one that aligns to that used by the range of stakeholders who support the area's growth and development through the West End Partnership.
5. Likewise, it is vital that the definition of the West End properly reflects the wide diversity of uses found within it. The West End is described in the key diagram as a collection

¹ WEP Members – Westminster City Council, London Borough of Camden, Westminster Property Association, London First, Mayor of London/TfL, West End Community Network, MPS, New West End Company, Heart of London Business Alliance, Bee London, Fitzrovia Partnership, The North Bank, Marble Arch London, Baker Street Quarter Partnership, London Chamber of Commerce & Industry, Federation of Small Businesses.

² West End Partnership Vision https://westendpartnership.london/wp-content/uploads/2017/10/wep_vision_2030.pdf.

West End Partnership

of 'Arts, Culture and Entertainment' uses. This ignores the other key functions of the West End as an unrivalled office location, an internationally renowned shopping destination, a phenomenally successful tourist destination, iconic and publically accessible open spaces, squares and parks, home to a number of world leading academic institutions and a place where people live. Rather than being defined as a 'Specialist Cluster' alongside other, highly specialist, areas the West End is defined in a similar way to the City of London; with a section of explanatory text that explains the range and diversity of uses within it, including those uses listed above *as well as* arts, culture and entertainment.

6. The exceptional international, national, regional and local functions of the West End, should be more clearly drawn together for the following reasons:-
 - i. The exceptional combination of strategic functions of the West End create particular opportunity for Good Growth and intensification, especially given the investment in the Elizabeth Line (and potentially Crossrail 2 - which is fully supported by the Mayor) and the numerous station facilities in the West End; the appropriate balance between all land uses in the West End needs to be struck. Inserting the following in SD4A would help; "*The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions as well as local uses, as well as the balance between them, should be promoted and enhanced.*";
 - ii. Policy SD4F should be amended to draw together the combination of strategic functions of which the international shopping and leisure destinations are one. In particular, recognition of the wider entertainment role, alongside the West End's international retail role should be acknowledged as increasingly the leisure/entertainment offer will be seen as integral to the attraction of global retail destinations and are increasingly important contributors to a destination's 'vitality and viability' (see –para 7 below);
 - iii. The intensity of activity in the West End requires an integrated and developed freight, deliveries, servicing and waste strategy that recognises that any potential move to out of hours deliveries will require mitigation measures (this is one area that the Partnership would wish to engage further with the Mayor and GLA/TfL);

West End Partnership

- iv. There is a particular need for intermediate housing in and around the West End – particularly to support the West End economy, which would link across to housing policy³;
- v. The office market and the life cycle of buildings means that the West End office market is functioning well, subject to there being clear delivery over the life of the Plan of the additional or more efficient use of commercial space required to meet the employment projections;
- vi. In terms of the provision of low cost/flexible office space – the DRLP should recognise and support the creative work being done by the market to deliver flexible office space that acts for start-ups and up-scaling companies. Given the very high commercial values in the WEP area a degree of pragmatism will be required when seeking low cost/affordable business/workspace alongside other strategic and local priorities;
- vii. Given the many stakeholders, including the Mayor, involved in seeking to enhance Oxford Street and its hinterland into a more coherent ‘District’ (and given that it has the potential to deliver a number of Mayoral priorities), it would be appropriate for the DRLP to place greater emphasis on this strategic initiative. For example, the physical transformation of the street itself has the potential to support and complement ‘Good Growth’ in the wider area. The plans for the Oxford Street District will improve air quality, reduce the number of freight, servicing and deliveries, encourage use of more sustainable modes of transport and deliver substantial public realm improvements. Therefore, in view of the strategic role and importance of the District to London, it is right that proposals for the District should be addressed within strategic policy and this should go beyond simply a descriptive mention of the proposals;
- viii. Finally, adding a paragraph specifically about the West End in the supporting text for SD4 would be a further way of referencing the Partnership’s 2015-2030 Vision for the West End.

- 7. The Partnership suggests that the DRLP, in recognising the challenges and opportunities faced by retailing over the lifetime of the Plan (para 2.4.11), should seek to encourage and allow the growth of a wider range of complementary uses and

³ See paragraph 12 below

West End Partnership

activities such as leisure and recreation, creative and cultural and events and experiences to provide an enhanced visitor environment in the International Shopping centres. The International Centres and the West End more widely seek to be at the forefront of encouraging and accommodating innovation – whether this be new forms of retailing, events, experiences and animation. Whilst it is recognised that development in the West End should continue to reinforce the retail function of the area, the Partnership is concerned that the A1 Use Class can sometimes be too blunt a tool to respond to innovation in the sector.

8. The Partnership welcomes recognition that it is appropriate for boroughs to set out local level approaches to mixed use policy. However, as drafted the level of detail in SD5 would harm the ability of boroughs to implement their own mixed use policies. Boroughs have particular land use priorities which are better met through a local plan. We therefore suggest that the Plan should explicitly delegate mixed use policy to the local borough level and excessive detail be removed.
9. The Partnership welcomes the introduction of Policy D12 and the agent for change. The Partnership recognises the challenges that can arise through the effects of development on residential amenity and the importance of the balance which needs to be struck.
10. The Partnership suggests that there should be a clear statement within the policies addressing the CAZ on optimising density, similar to Policy D6 in respect of housing. Alternatively, Policy D6 should be amended to make clear that more efficient use of land for all forms of development including commercial floorspace is necessary for sustainable growth. This is particularly relevant given the character and function of the West End, the exceptional high levels of public transport, investment and accessibility, future employment projections and the opportunities offered by the transformation of the Oxford Street District and other major public realm initiatives.
11. In respect of Policy D8, a tall building is defined as “generally those that are substantially taller than their surroundings and cause a significant change to the skyline”. The DRLP continues to state that in the West End, this would amount to more than 30 metres⁴. The 30 metres height is a trigger for the referral of applications that may be of potential strategic importance. The West End, whilst not dominated by tall buildings, does contain many buildings over 30 metres. In some circumstances, proposals for buildings of a similar height may not therefore cause significant change to the skyline. It is suggested, therefore, that the paragraph should be amended by the deletion of the reference to the figures for referral.

⁴ Paragraph 3.8.2., Draft Replacement London Plan

West End Partnership

12. Policy H7 sets out the affordable housing tenure that should be applied to development across the whole of London. There is particular need in the CAZ for intermediate housing, as housing tenure has become particularly polarised. The Partnership, therefore, recommends that the Mayor's housing tenure mix be encouraged, rather than required, in all cases. Local housing needs should be addressed more closely at the local level.
13. Policy S6 addresses public toilets. This is an example of a matter which should be left for control at local level.
14. Draft Policy E4 refers to land for logistics and includes the need for *“last mile’ distribution, consolidation centres and collection points’*. Within the CAZ industrial land is scarce but non-industrial, low value, sites still exist (e.g. off street car parks) and fall within the group of land uses which should be preserved for these purposes. It would be helpful if the DRLP specifically mentioned this and encouraged the provision of logistics infrastructure on redevelopment.
15. The Partnership is of the view that draft Policy E10F in respect of short term letting is unduly lax and fails to appreciate the impacts that unregulated short term letting and the phenomenal growth of app-based home sharing and letting platforms have had on residential neighbourhoods in parts of the CAZ and the West End in particular. The DRLP should be supporting those boroughs and established hotel and visitor accommodation providers in seeking a level playing field and a London-wide compulsory registration scheme.
16. In respect of Policy of HC6 and paragraph 7.6.1., the DRLP defines the night-time economy as being from 6pm to 6am. Insofar as the West End is concerned, there is a very clear distinction between the evening economy (6pm-12am/1am) on the one hand and the night-time economy (12am/1am-6am) on the other. The evening economy of the West End should be strongly promoted, subject to being managed. The management of a night-time economy is very distinct and requires a more robust and multi-agency approach.
17. The Partnership draws your attention to the submission made by the WECN to the Mayor's Night Time Commission consultation which provides a useful insight into this debate.
18. Policy T5B refers to the reallocation of on street parking spaces to cycle parking where off street cannot be provided. In the West End kerbside space is limited and in demand from a variety of users. Given the importance placed on reducing and managing freight and deliveries, in the unlikely event that ‘spare’ kerbside space that is not needed for

West End Partnership

other purposes is identified, it should be prioritised for pedestrian use and then servicing and deliveries.

19. The West End is entirely in the CAZ and is an area with good public transport accessibility. As such the DRLP requires car-free residential development. The Partnership supports the objective encouraging sustainable travel, but would strongly encourage the Mayor to continue to fund public realm improvements, walking and cycling initiatives and sustainable transport infrastructure such as EV charging points, car clubs and regulated cycle hire to enable current and future residents to live sustainably.
20. Policy T7A refers to other area based plans. It would be helpful to have clarification that documents, strategies, action plans, etc. produced by the Partnership would constitute 'relevant documents', in accordance with the Policy.
21. Policy T9 identifies that the Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2. However, there is no agreed funding package at present and should no funding deal be achievable *"the Mayor will apply the MCIL2 proceeds to fund other strategic transport projects which have a funding gap"*. Given that the West End will contribute a significant amount of MCIL2 funding (as it has done for MCIL1) and the success of the West End is integral to London's position as a global city, MCIL2 should be used to fund the transport and public realm improvements that the Partnership has lobbied and sought funding for. The Partnership supports, as a matter of principle, that value created locally be invested locally.
22. In respect of delivery, Policy DF1 states that all Development Plan policies should normally be met. The reality has always been that within Development Plans, and hence decision-making, clear priorities and trade-offs need to be made. It is not clear how the DRLP will deal with creating clear priorities.
23. Policy DF1 D appears to construct priorities of (a) affordable housing and necessary public transport investments and, following that, (b) the role of large sites in delivering health and education infrastructure and the importance of affordable workspace and cultural and educational facilities and delivering good growth. In the case of the West End, these priorities do not reflect the emphasis which the WEP's Vision 2015-2030 has established. It is, therefore, important that the Plan allows the two local authorities to establish and implement their own priorities at the local level.

West End Partnership

WEP Vision 2015-2030

Appendix 1

The WEP Vision is that over the next 15 years the West End will be:

1. Vibrant, productive, resilient, creative and surprising
2. Playing a pivotal role in London's continued economic success
3. Providing new jobs and skills opportunities
4. Easy to reach, with less congestion and better air quality
5. Safe and secure as well as open and relaxed
6. Renowned for the quality, interest and extent of its public spaces, helping to differentiate London from other world cities
7. Inspiring a sense of common purpose
8. More self-reliant