

City Plan 2019 – 2040

Executive Summary

1. *New West End Company, the importance of the West End to Westminster, London and the UK and key growth factors*

The West End is a vital element of the economies of Westminster, London and the UK with a GVA greater than The City¹, employing 522,000 people² and set to accommodate half of the 77,000 new jobs created by 2036. The City Plan projects further job growth predicting up to 96,000 additional jobs across the wider West End from 2016-41.

It faces increasing global competition and structural changes to retailing. Its role in attracting investment and talent to London will increase after Brexit. It needs to accommodate 40% more visitors when the Elizabeth line opens and retain the important mix of retail, entertainment, culture, commercial and residential use.

2. *New West End Company's four key asks of the City Plan*

New West End Company broadly welcomes the emerging City Plan and support its recognition of the importance of the West End International Centre and the need for policies that enable it to grow in ways which retain its global position. We also support the City Council's analysis of the amount of additional commercial space required to accommodate expected job growth.

New West End Company has identified four key asks of the Development Plan which will most support the future growth of the West End.

3. *Key Ask One – That the City Plan provides the level of flexibility of uses in the West End to enable appropriate growth to take place through the lifetime of the plan.*

Changes in global retailing and customer demand will require a more flexible range of uses in the West End.

We support policies 2C and 15I which support flexibility. However, we are concerned to ensure that:

- The City Council is ambitious enough to allow new global formats which may emerge throughout the lifetime of the plan.
- Further guidance through an SPD for the Oxford Street District involves retailers and extends to the whole of the International Centre.
- Flexibility is not restricted unnecessarily by restrictions on more than three non-A1 uses consecutively in a frontage.
- Parts of Oxford Street are not included in the Soho Special Policy Area.

¹ West End Partnership Delivery Plan 2015-30

² Arup West End Good Growth 2018

4. *Key Ask Two – That the City Plan provides sufficient new commercial space to accommodate agreed job growth targets with supporting infrastructure.*

The Plan cites scenario testing for the West End by Arup (2018) which projects potential for an uplift of 96,000 jobs by 2041 across the wider West End.

The Plan also references the London Office Policy Review estimate of a further 75,000 office based jobs in Westminster between 2016-41. This, it says, will require as much as 850,000 square meters of additional office space.

The City Council already has ambitious jobs growth targets with 50% of the 77,000 new jobs proposed by 2036 being in the West End. These new visitors will further support the growth of the West End.

The City Council recognises the need to create up to 2 million square meters of new commercial space to accommodate these additional job numbers. The Elizabeth line provides a major new commuter link.

The Arup Report on West End Good Growth states that only a good growth scenario, which requires 1.3 million sqm of additional commercial space, will allow for significant net job growth of up to 96,000 additional jobs by 2041. All other scenarios, even those including an element of growth, are forecast to result in a decline in job numbers in the West End by 2041 due to continued loss of commercial space.

We welcome Policy 1C, 1E and 1H which support the provision of sufficient new commercial space throughout Westminster and policy 2A which supports intensification in the West End.

But we are very concerned that policies insisting on commercial developments including 35% of affordable housing will freeze development. Development will become unviable and if housing is for sale the mixed tenure will prevent future development taking place.

We also believe that it will make an already challenging additional office target (850,000 square meters) much more difficult to achieve since it will require 1,307,000 square meters of total development.

We appreciate that developments in the International Centre will be allowed to provide the 35% of affordable housing off-site within the West End Retail and Leisure SPA but we believe that it will be difficult to find sites.

We understand the City Council has undertaken an independent assessment of the likely impact of these policies on the provision of affordable housing and commercial space in Westminster. We would like the City Council to share this information with the business community.

In addition, we believe that any additional housing within the International Centre will create difficult-to-solve amenity problems because many existing operational and servicing activities will conflict with new residents' expectations for a peaceful home life.

5. *Key Ask Three – That the City Plan promotes a high-quality physical environment and encourages a dynamic range of experiences.*

To attract international and domestic visitors requires high-quality public realm and a continually changing range of experiences.

We support policies 2D, 2E,2F and 2G which promote a diverse evening and late night economy, a more coordinated approach to freight and waste management services, an enhanced public realm and transport infrastructure and the protection of the unique character of the West End.

However, we believe that a comprehensive, world class district management plan, fully costed and with resources identified, needs to be put in place as soon as possible if the West End is to maximise the returns on the significant investment in the Elizabeth line and the Oxford Street District transformation. This is a key recommendation of the Arup Report.

6. *Key Asks Four – That the City Plan defines the geographical extent of the West End International Retail Centre to enable greater policy flexibility.*

We welcome the clear geographic definition of the International Centre as the necessary foundation for policies specific to the Centre. We suggest that a future SPD for the Oxford Street District should apply to the entire International Centre and that thought should be given to a range of policy measures specific to the International Centre which will support its growth and economic success.

7. *Other Policy Areas - Connection Policies*

We support policies to make Westminster a walkable city by prioritising pedestrians and reducing bus services and stands.

We support proposals to provide better cycling routes but not on Oxford Street.

We believe that Oxford Street should be removed from the Strategic Road Network.

We support policies to encourage freight and waste consolidation.

8. *Other Policy Areas – Environment Policies*

We support policies to improve air quality in the area.

We support policies to prioritise Oxford Street for air quality offset schemes.

City Plan 2019 – 2040

1. New West End Company, the importance of the West End to Westminster, London and the UK and key growth factors
 - 1.1 New West End Company welcomes the opportunity to contribute to the City Plan consultation undertaken by Westminster City Council (WCC). We are also responding to the City Councils Oxford Street District Consultation which we see as a complementary document.
 - 1.2 New West End Company is the Business Improvement District (BID) for the major shopping streets of London's West End. Comprising an Occupier BID and a Property Owner BID, we represent over 600 retail, hotel and property companies in and around Oxford Street, Regent Street and Bond Street. We are the leading business voice in the West End.
 - 1.3 New West End Company has worked closely with WCC and others over twelve years to promote the growth of the West End and to address many of the issues that the district faces. In particular, we are members of the West End Partnership (WEP) which brings together the City Council with representatives of all the major communities and interested parties in the West End to plan for its successful and sustainable growth.
 - 1.4 New West End Company strongly supports WCC's plans to enhance the Oxford Street District both in the City Plan and the Oxford Street District proposals. The importance of the Oxford Street District, and the wider West End, to London and the whole UK are well documented within WCC's supporting documents. The West End Partnership has outlined the direct impact of the West End on the economy showing a GVA of £51 billion³, more than the City (£43.9 billion) and almost as much as the whole of Wales (£52 billion). It employs over 522,000 people⁴. The West End is set to accommodate half of the 77,000 new jobs planned for Westminster by 2036⁵.
 - 1.5 To ensure that The West End retains and enhances its global position it needs positive planning policies which enable it to respond to the ever-changing environment in which it operates. The key growth factors are outlined below.
 - 1.6 *Increasing global competition* - if the West End is to retain its international status against increasing competition, both from traditional international destinations and from emerging competitors in the Middle East and Far East, it needs to evolve and invest in ways that respond to constantly changing customer trends and demands.

³ West End Partnership Delivery Plan 2015-2030. The GVA figure has recently been updated in the 2018 Arup Report on West End Good Growth to £57 billion GVA for Westminster "the majority of which sits in the West End"

⁴ Arup West End Good Growth 2018

⁵ West End Partnership Delivery Plan 2015-30

- 1.7 *Structural change* - globally, retailing is facing a structural change with the growth of online retailing and the changing expectations of new generations which sometimes differ in the West from the emerging consumer markets in the East. Any successful international retail centre needs to appreciate and adapt to accommodate these trends.
 - 1.8 *Brexit* - as Britain leave the European Union and loses the benefits it gains from being a member of the Single Market and Customs Union, it is vital that London continues to be a draw to international talent, investors and visitors. The West End is a major part of this draw, offering a lifestyle unmatched in many other global cities that compete for the same talent, investment and visitors. Not only can the West End not afford to decline, it cannot afford to stand still. It must invest and evolve to remain a vital part of the attraction of London and the wider UK.
 - 1.9 *Elizabeth line* - At a local level, the forthcoming opening of the Elizabeth line, estimated to bring an additional 60 million visits annually, means that investment has to be made to provide a safe and comfortable environment for visitors and residents alike when visit numbers rise by 40% above the current 200 million.
 - 1.10 *West End mix* - New West End Company appreciates that it is the unique mix of uses in the West End that makes it so special and attractive to worldwide visitors and investors. The scale, mix and quality of retail, culture, leisure and entertainment in such a concentrated space makes the West End a global attraction. The amount, variety and value of commercial employment throughout the West End provides an economic bedrock that supports the retail, leisure and entertainment offer. The seamless integration of thriving residential communities throughout the district provide a lively and human character that distinguishes it from soulless shopping centres. New West End Company recognises the importance of this special balance to the district's continued success and is conscious of the need to improve the environment for all elements of the West End's communities.
2. New West End Company's four key asks of the City Plan
 - 2.1 New West End Company broadly welcomes the emerging City Plan. We are pleased that it recognises the importance of the West End International Centre and is proposing policies that will support its future growth as national and global retailing evolves. We agree with the Plan's analysis of the need for significant additional commercial space to accommodate accepted job growth targets to 2041. Our comments are therefore, in most cases, seeking clarification on specific policies and more definitive explanation of them as well as suggesting how they might be developed further to meet the City Council's objectives.
 - 2.2 In response to both elements of the Development Plan, New West End Company has identified four key asks which we believe will have the most positive impact on the future growth of the West End.

- 2.3 We are encouraged that these have largely been addressed, both in the London Plan and the draft City Plan. In the City Plan they relate to the Spatial Strategy and Economic and Employment Policies, but they also refer to the Housing Policies. The four key asks are:
- Key Ask One – That the Development Plan provides the level of flexibility of uses in the West End to enable appropriate growth to take place through the lifetime of the plan.
 - Key Ask Two – That the Development Plan provides sufficient new commercial space to accommodate agreed job growth targets with supporting infrastructure.
 - Key Ask Three – That the Development Plan promotes a high quality physical environment and encourages a dynamic range of experiences.
 - Key Asks Four – That the Development Plan defines the geographical extent of the West End International Retail Centre to enable greater policy flexibility.

3. Key Ask One – That the Development Plan provides the level of flexibility of uses in the West End to enable appropriate growth to take place through the lifetime of the plan.

Background

- 3.1 To encourage and enable investment businesses need for a planning environment that permits them to introduce new ideas and concepts, while conscious of the need to retain the unique character and mix of commerce, heritage, entertainment and residential communities that make the West End so special.
- 3.2 Global retailing and customer expectations are not only evolving quickly but they are doing so in directions that are difficult to predict years in advance.
- 3.3 This means that for planning policy to support and encourage growth in the West End, to future-proof it against global and national competition and to protect and create more jobs, it has to be sufficiently flexible to allow decisions to be made throughout the lifetime of the plan that reflect the current and future environment, rather than being constrained by the past.

Policy response

- 3.4 We support policy 2C “An improved retail and leisure experience that responds to innovation and change in the sector, including the transformation of Oxford Street”.
- 3.5 We also support policy 15I “Complementary town centre uses within an A1-retail unit will be supported in principle where they are clearly subsidiary to the host unit”. We believe that the policy should go further since some multilevel retail units may need to reduce primary and ancillary A1 uses.
- 3.6 However, we urge Westminster City Council to be ambitious in the extent of the flexibility of uses. As an International Centre the West End needs to attract uses that are both cutting edge and of a quality that will allow the West End to compete with other global shopping and entertainment centres, attracting visitors not just from the UK and from around the world. We are aware that Westminster City Council states that Oxford Street is the nation’s high street. But it is also an international shopping street which competes with the likes of Fifth Avenue, the Champs Elysees and the Dubai Mall. Planning authorities need to recognise the international

market in which the West End operates and the need for world class attractions when considering complementary uses.

- 3.7 We would appreciate more clarity on whether future new concepts, that are not traditional town centre uses, but would contribute to the West End's global profile, would be considered positively, not just in Oxford Street but throughout the International Shopping Centre. We note in 15.8 that "further guidance on our approach to development in the Oxford Street District may be provided through an SPD". We would welcome involvement in this but suggest that it should apply to the entire International Centre.
- 3.8 We are concerned that Policy G3 prohibits change of use from A1 if it results in more than three non A1-uses consecutively in a frontage. We believe that this is unnecessary and reduces flexibility.
- 3.9 We note the boundaries and policies of the Soho Special policy area and are concerned that the SPA includes a length of south Oxford Street. This section of Oxford Street is part of the International Shopping Centre, which is qualitatively different from Soho. We believe that the boundaries of the Soho SPA should be amended to exclude Oxford Street retail units. This is the approach adopted on the east side of Regent Street.
4. Key Ask Two – That the Development Plan provides sufficient new commercial space to accommodate agreed job growth targets with supporting infrastructure.

Background

- 4.1 If planning policy is to help create the environment that appeals to West End visitors it needs to be based on a clear understanding of the district's key visitor groups.
- 4.2 The West End is a major draw for national and international tourists, and these are hugely important markets. But over 50% of the people visiting the West End are those who work in the district. One hundred thousand of the six hundred thousand West End employees work in shops and restaurants. But the other five hundred thousand work in offices above and around the retail core.
- 4.3 These visitors come in every weekday and they form a bedrock of customers that underpins the success of the West End. To grow this market, we need more jobs and we need a shopping experience that encourages employees to spend time and money in the West End throughout the day and evening when they aren't working.
- 4.4 WCC already has ambitious jobs growth targets of 77,000 new jobs by 2036, half within the West End⁶. Para 2.5 of the City Plan cites scenario testing for the West End by Arup (2018) which projects potential for an uplift of 96,000 jobs by 2041 across the wider West End.
- 4.5 Para 14.3 of the City Plan cites the London Office Policy Review estimate of a further 75,000 office based jobs in Westminster between 2016-41. This, it says, will require as much as 850,000 square meters of additional office space.

⁶ West End Partnership Delivery Plan 2015-2030

- 4.6 Para 15.3 of the City Plan quotes GLA forecasts of the need for between 464,865 square meters and 579,194 square meters (gross) of new comparison retail floor space in Westminster.
- 4.7 Research commissioned by Westminster Property Association from Volterra, based on an assessment of the mix of future jobs and the space needed to accommodate this mix, estimates that around 1.9 million square meters of additional commercial space will be required to house the earlier 77,000 jobs growth target.
- 4.8 This figure is a net figure and has to be in addition to the replacement of any existing commercial space lost in Westminster, particularly through conversion to, or replacement by, housing. Westminster City Council confirms this figure. In its consultation paper “Building Height” WCC states that “being at the heart of a world city there is no room for a ‘no growth’ option”. The council continues “we have to find an additional two million square metres of business floorspace to accommodate an additional 77,000 jobs and to make up for the significant amount of office space we have lost to housing since 2005”.⁷
- 4.9 Providing this additional commercial space requires a mix of policies including densification, greater height, better use of existing space and innovative working ideas.
- 4.10 The Arup Report into West End Good Growth (November 2018), commissioned by the Mayor and Westminster City Council looks at different scenarios for future economic activity in the West End. It suggests that if the recent trend of net loss of commercial space was to continue (mainly because of commercial space being converted to residential) far from being able to accommodate these ambitious job growth targets, job numbers would actually fall of 21,000 gross jobs in the West End by 2041. A “decline of sorts” scenario would see West End gross employment drop by 58,000 by 2041. It is only the “good growth” scenario (a net increase of 1.3 million square meters of commercial space) that delivers sufficient accommodation to allow net job growth in the West End of up to 96,000 by 2041.
- 4.10 In addition the district needs the infrastructure that is vital to support modern businesses. The Elizabeth line is a major transport boost. But we also need to ensure we have high quality broadband, electricity supplies and other vital services that businesses need to operate efficiently.

Policy response

- 4.1 We welcome the spatial strategy policies in the draft City Plan including:
- “1C Halting the loss and supporting the growth of a variety of business space to provide at least 75,000 new jobs”
- “1E Delivering growth through the intensification of the CAZ (including the West End)”
- “1H Ensuring sufficient supporting infrastructure is delivered to facilitate growth

⁷ “Building Height: getting the right kind of growth for Westminster” March 2017

- 4.12 We support in the draft City Plan the special development priorities which proposes:
- “The intensification of the West End Retail and Leisure Special Policy Area over the plan period (to) deliver –
- “2A Provision of a range of commercial development that secures significant jobs growth”
- 4.13 We note the reference in 2.4 to “new developments with increased scale and massing along Oxford Street” and would appreciate more specific guidance on this and how much increased scale and massing would be required to accommodate the job growth targets agreed by the City Council.
- 4.14 We welcome the proposal that retail development is not subject to the emerging mixed-use policy and would not need to contribute to affordable housing. We also welcome, in policy 15D, the exemption of the International Centre from the policy to support residential use in upper floors of town centres.
- 4.15 We are very concerned, however, that proposals within the draft City Plan which state that hotel and office developments over 1,000 sq m will require 35% of the floorspace to be affordable housing on site (9G) will freeze major development in the CAZ. Many developers will not wish to create housing for sale within commercial developments because this will prevent future redevelopment of a key commercial site. It is also likely that the requirement to provide affordable housing will make developments unviable even if the housing is sold. If the housing is for rent, in order to retain the ability to redevelop the building in the future, this will not provide the returns necessary to make the development viable. We are very concerned that the policy risks prejudicing major new commercial development as developers await future policy changes.
- 4.16 The 850,000 square meters of additional commercial space cited in the Plan is already a hugely challenging target that will require radical policies if it is to be delivered. Adding a further 457,700 square meters to meet the proposed affordable housing policy⁸ will make an already very difficult target almost impossible to meet.
- 4.17 While we appreciate that policy 9H allows, where the development is within the WERLSPA, for the 35% affordable housing requirement off-site but within the Special Policy Area we are concerned that sites will be difficult to find and this will again prevent much needed commercial redevelopment.
- 4.18 We would ask Westminster City Council to explain how policies 1C, 9G and 9H can be reconciled to provide more commercial space and more affordable housing. While each on their own is a commendable aim, taken together we fear they will prevent growth of both housing and

⁸ 1,307,700 sq m of new development will be required to produce 850,000 sq m (65%) of commercial space together with 457,700 sq m (35%) of affordable residential.

commercial space. This will have a serious negative impact on the City Council's housing policy aims and the commercial growth of the West End.

- 4.19 Failure to achieve the additional commercial space required would also damage business rate growth and therefore, potentially, additional financing for the City Council). The Arup Report suggests that the "decline of sorts" scenario would lead to a fall in business rate income by 2041 of £1.5 billion annually (-52%). In contrast the good growth scenario delivers an estimated £4.9 billion of business rate growth by 2041, a 168% rise for Westminster.
- 4.20 Given the importance of both these policy areas, our professional concerns about the negative impact of these combined policies on future job growth and housing numbers, and the significant drop in job numbers and business rate growth forecast by Arup of failing to provide the necessary growth of commercial space we believe that this is such a serious matter that the Council should test the likely impact of these particular policies on future provision of commercial space. We recommend that the City Council shares its independent assessment of the likely impact of these policies on the provision of affordable housing and commercial space in Westminster with the business community.
- 4.21 In addition we believe that mixing residential with the scale of retailing in and around the major shopping streets will lead to problems both for new residents and local councillors. In particular, we believe that the existing and future operation and servicing of stores may create a series of local concerns for people living in new homes nearby which will be difficult to resolve satisfactorily.
- 5 Key Ask Three – That the Development Plan promotes a high quality physical environment and encourages a dynamic range of experiences.

Background

- 5.1 If domestic and international visitors are to continue to be drawn to the West End, if employers are to continue to locate their businesses in the West End to retain and create jobs, and if employees are to continue to spend time outside work in the West End, then the district needs to be attractive, safe, clean and appealing.
- 5.2 This means that we need less traffic, high quality public realm, better air quality, high quality design and finish, more green spaces, good street management and a feeling of security.
- 5.3 It also means that we need to create a continually developing overall experience that draws people in, makes them stay longer and encourages them to return. This experience will have many elements including the quality, quantity and mix of retail and other complementary uses. It will include events and attractions, both district wide and within individual stores and businesses.

Policy Response

5.4 We welcome policies that support these aims, in particular:

“The intensification of the West End Retail and Leisure Special Policy Area over the plan period(to) deliver the following policies:

“2D A diverse evening and late night economy and cultural offer.

“2E A more coordinated approach to managing the areas freight, servicing and delivery demands.

“2F An enhanced pedestrian environment, public realm.....and network of public infrastructure.

“2G Protection of the unique character of some of central London’s most distinct and iconic places”

Issues

5.5 We are very concerned about the current and future management of the International Shopping Centre. Without well planned, well delivered and well-funded management of the district the full return on the substantial investment both in the Elizabeth line and the Oxford Street District transformation will not be realised and the West End will struggle to retain its world beating position.

5.6 We welcome Westminster City Council’s commitment to a comprehensive district wide management plan to be in place for when the Elizabeth line is open in the West End and the substantive Oxford Street District works have been completed. However, we would urge the Council, working with business, to define what a world class shopping and leisure district management plan looks like, how much it will cost annually and how the resources will be found to deliver and evolve it each year.

5.7 Moreover, we believe that that management plan is needed now. We should not wait for future developments. Many elements of the management of the West End are currently below the standards many businesses and consumers believe are required of such an important national asset. These need addressing now, not in two or three years’ time.

5.8 The Arup Report recommends a “long-term sustainable footing for the provision of a range of “city management services” and infrastructure investment” and suggests an extensive engagement programme to support a management plan. It suggests that consideration should be made for revised business rate retention or other income such as tourism taxes. While New west End Company has concerns about the impact of the latter, we do believe that the now defined International Centre should, like The City, have unique funding policies, such as an element of business rate retention, that recognised the need to support a major national asset.

5.9 As a particular point we believe that consideration should be given to ensuring that a greater part of CIL is spent on enhancing the physical environment within the proximity of any new development.

6. Key Asks Four – That the Development Plan defines the geographical extent of the West End International Retail Centre to enable greater policy flexibility.

Background

- 6.1 The International Retail Centres identified within the Development Plan are qualitatively different from all other shopping districts in the UK. They compete globally for customers and investors. They are also great engines of the UK economy, attracting billions of pounds of foreign currency. Together they account for around 80% of all spending by international visitors on shopping in the UK.
- 6.2 As such they have potential to benefit from policies that focus uniquely on them and their requirements, particularly to enable them to compete with other international shopping destinations. The ability for policy makers to target change uniquely on the International Retail Centres without setting precedent for other areas gives them flexibility to respond to global trends and, in doing so, enable the International Centre to adapt quickly to change.
- 6.3 To do this requires a geographical definition of their extent of the West End International Shopping Centre.

Policy response

- 6.4 We are pleased that the City Plan defines the International Shopping Centre. We look forward to discussing with the City Council how the International Centre can be supported through policies aimed specifically at its unique requirements.
- 6.5 We also welcome the introduction of the new West End Retail and Leisure Special Policy Area and its expansion from the former West End Retail Special Policy Area.
- 6.6 We note in 15.8 that “further guidance on our approach to development in the Oxford Street District may be provided through an SPD”. As mentioned above, we would welcome involvement in this but suggest that it should apply to the entire International Centre.
- 6.7 Moreover, we believe that the opportunity should be taken, now that the International Centre is geographically defined, to create a series of positive policies specific to the International Centre that recognise and respond to its global status and unique importance to the UK economy which makes it qualitatively different from all other retail districts. This could include, for example, licencing, policing and district-wide management.

7. Other Policy Areas - Connection Policies

- 7.1 New West End Company welcomes the connections policies, which are largely consistent with the Mayor’s Transport Strategy (MTS) and Westminster City Council’s Local Implementation Plan and Walking Strategy. As the business community representative of some of Europe’s busiest streets for pedestrians, we particularly welcome polices;

“24C -To make Westminster a truly walkable city, new development will prioritise pedestrian movement creating a legible, attractive, accessible and safe pedestrian environment

“24D – Accessibility will be improved by designing out conflicts with other transport modes through the enhancement of the public realm”.

- 7.2 In addition, policy 24G2 sets out the benefits of reducing bus services and relocating bus stands to less intensively used areas by pedestrians. We welcome this, particularly in the Oxford Circus area, which has a very high pedestrian footfall and is London’s fourth busiest station. Buses terminating and standing in this area is detrimental to the safety of pedestrians and restricts road space that otherwise could be allocated to pedestrians.
- 7.3 Map 14, p89, identifies a network of cycle routes, which does not identify Oxford Street as an east-west cycle route. We welcome this, primarily for the safety and comfort of both pedestrians and cyclists on Oxford Street, which would otherwise come into conflict if this were a designated cycle route. We therefore encourage the early construction of alternative, high quality east-west cycle routes and restrict Oxford Street to pedestrians, bus services and access for servicing.
- 7.4 Paragraphs 25.4 and 25.5 describe a hierarchy of road types and uses of these roads. Historically Oxford Street has been a part of the Strategic Road Network (SRN). However, for many years it has been a destination for around 160 million pedestrians annually and a route for a small number of bus services, indicating that it no longer serves a purpose as part of the Strategic Road Network (SRN). Moreover, ‘International Centre’ status clearly defines Oxford Street as a unique destination, therefore in no sense should its function be as a route for the rest of London. Consequently, we encourage WCC and TfL to agree to remove Oxford Street from the SRN as it no longer serves this purpose.
- 7.5 Policy 26 (pp93 and 94) addresses freight, servicing and deliveries. It is acknowledged that servicing should take place within the footprint of a new development wherever possible. Although this may reduce the available leasable space in new developments, the alternative of deliveries and waste collection on the highway detracts from the experience and look of the West End, therefore can detrimentally affect its economic performance.
- 7.6 New West End Company offers a preferred supplier scheme for waste, recycling business supplies and personal deliveries to all businesses in its footprint. We suggest participation in this or similar preferred supplier consolidation schemes is added to policy 26.6 as follows:
- “Applicants should demonstrate how freight needs will be minimised in an efficient, safe, and sustainable way through the use of *preferred supplier consolidation schemes*, Delivery and Servicing Plans (DSPs) and Construction Logistics Plans for the construction phase.”
- 7.7 Policy 28 concerns parking standards. The policy recognises the general principle that the availability of parking can be a factor in generating car trips (28.1 and 28.10). However, the overall availability and relationship of on-street and off-street parking in a neighbourhood

needs to be considered in the round. On-street parking is space that otherwise could be allocated to pedestrians. On-street parking needs to be based on current, rather than historic needs and we suggest a hierarchy in which on-street parking space is allocated according to the sustainability of modes.

8. Other Policy Areas – Environment Policies

- 8.1 It is disappointing that Westminster has been an Air Quality Management Area for twenty years (32.1) yet it still has amongst the worst air quality in Europe, in particular on Oxford Street and Regent Street (Maps 18 and 19). These streets have very high footfall, therefore high exposure to pollutants. In this context – and that building design can meet energy efficiency standards – the policy that major developments will be air quality neutral could be adopted as a minimum.
- 8.2 The benchmarking approach seems to be based on particulate matter, which is a local pollutant that can affect public health. We also encourage the adoption of guidance, advice and possibly too, standards to also reduce NO₂ and also carbon emissions, as part of an approach to good growth in the Oxford Street District – that is growth that benefits all stakeholders and communities. This would ensure this section of the draft City Plan is also consistent with paragraphs 36.1 and 36.5. Advice on achieving these goals in non-residential building design can be seen at:
https://www.carbontrust.com/media/77252/ctc765_building_the_future_today.pdf
- 8.3 We support policy 32B requiring Air Quality Assessments for all major developments, social infrastructure schemes and developments which incorporate combustion based technologies and welcome the priority given to Oxford Street. We welcome proposals to prioritise Oxford Street for air quality offset projects to benefit the health of the hundreds of thousands of employees, local residents and millions of visitors to the street every year.
- 8.4 We welcome the principle of policy 34.F on waste management which is consistent with policy 26, but would welcome more detail and guidance on the scale of facilities and whether composting can be provided at the neighbourhood or district level.
- 8.5 We welcome policy 35 on green infrastructure, open spaces and play spaces. Significant additional greening of the Oxford Street district can contribute towards supporting biodiversity, reducing the heat island effect, absorb some pollutants and create spaces to improve the experience of residents, workers and staff.