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Dear Mr Kemp,

A CITY FOR ALL LONDONERS: RESPONSE OF WESTMINSTER CITY COUNCIL

The City Council notes the publication of “A City for All Londoners”. Its general approach resonates well with our objective of ensuring “A City for All”, and its central concept of “good growth” mirrors our priority to ensure we deliver the right kind of growth that optimises benefits for residents, workers, visitors and businesses and helps us ensure Westminster continues to make its unique contribution to the success of the capital and the United Kingdom as a whole.

We are also pleased to have the opportunity to comment on your priorities as you move towards preparation of the London Plan and other strategic documents. London faces the prospect of changes of a scale and kind unprecedented for a generation over the next decade; all those involved in local governance and policy-making will need to be ready to respond to these developments at a time when resources are likely to continue to be at a premium. We look forward to working with you and your colleagues over the coming year to ensure that our City is prepared to meet these challenges.

This is the spirit in which our comments are made. I hope that you find them helpful and we would be glad to discuss them with you and your officers as you go forward to policy-making.

General comments

We particularly welcome the emphasis that runs through the document on London’s distinctiveness. The scale and nature of issues in London mean that there is often a need to ensure policies tailored to our particular circumstances. We look forward to working together to ensure ministers bear this principle in mind. In particular, we support the drive for further devolution from national to London level; we hope this will go further within London, to sub-regional and borough level, to ensure that the huge differences in circumstances across the capital are also taken into account in delivering policies and services meeting the needs of each area and clearly accountable to local people.

The scale of the challenges and constraints on resources mean that it will be important to empower every level of London governance to play its part, with a clear focus on delivery against agreed



objectives. In general, institutional change should be avoided unless it will clearly add value substantially outweighing the cost and disruption it is likely to bring – it is essential, for example, that the Homes for Londoners Board remains a light-touch agency that helps facilitate delivery by local housing authorities and providers (who can ensure integration with management, maintenance and allocation) and not a large, top-down body that simply slows down provision of urgently-needed new housing. On these principles, there are some areas where the Mayor could usefully help bring London authorities together either to help secure economies of scale (in procuring temporary accommodation, for example) or deliver more specialised services (such as many of those around rough sleeping).

If we are to meet the challenges of growth and deliver the scale of ambition we share it will be essential to have funding and financing models in place to ensure London has the resources it needs. Given the likely pressures on public finance, this means discussion with national government about further fiscal devolution and the linked question of innovative approaches to capturing increases in value from growth. There is surprisingly little about the question of resourcing in the document and it will be vital to address this in greater detail as the London Plan and other strategies are developed. It would have been helpful had it been possible to give some further detail about the work that the reconvened London Finance Commission will be undertaking; we look forward to further discussions as these issues are taken forward.

The importance the document gives to central London is welcome. We are disappointed, however, that it talks only in terms of protecting and sustaining its role in creating jobs and wealth and does not recognise that it is a place where many people live. Over the next years this part of the capital will have a vital part to play in ensuring the continued success and prosperity of London and the wider UK. Given this, a far more positive and ambitious approach is appropriate, enhancing and promoting central London while valuing the heritage and amenity quality that are inseparable elements of its success. There is considerable scope for intensified growth in the Central Activities Zone (CAZ), but the document almost gives the impression that it is somehow “full” and that the priority is to protect what is already there while encouraging further growth elsewhere. The London Plan in particular must be based on a strong, clearly expressed vision for central London and a commitment to ensuring it can build on its success as a world-class place to live, work, visit and do business.

The scale and direction of change mean that there is a need to look at the form the London Plan (and other strategies) should take. These changes are being reflected in the kinds of development coming forward, many of which (such as new kinds of housing developed by companies such as The Collective which is aimed at young professionals happy to share communal kitchen or living rooms and housing products aimed at older people) do not fit easily within traditional land use planning categories. More than ever it will be important for the London Plan to be genuinely strategic, setting clear direction and objectives but leaving it to local planning authorities to deal with detailed delivery and the standards required to ensure development meets the needs and circumstances of



each area in their own plans. In particular the Plan should avoid simply replicating or providing a gloss on national policy and guidance as this unnecessarily complicates plan-making and decision-taking.

Ensuring the right kind of growth requires good planning. As a start we will shortly be conducting a major consultation exercise on what constitutes the right kind of growth for Westminster and, in particular, the part that larger/higher buildings have to play in delivering it. We will be inviting the GLA to comment and look forward to working together to take this agenda forward.

Our detailed comments apply these principles to the issues raised in each of the chapters of “A City for All Londoners”. We use the headings in the text.

Accommodating growth

Employment land in central London

While we welcome the prominence given in the document to the importance of central London and the CAZ, the significance of the area and the policy and other issues it faces in order to ensure its sustained success go far beyond the question of “employment land”. The West End alone generated £51.25 billion in Gross Value Added in 2014 – 3% of the economic output of the United Kingdom and 15% of London’s - and employs over 600,000 people. In 2015 it attracted 31.5 million UK and international visitors who spent £11 billion. The CAZ plays a huge role in sustaining the prosperity of London – of the 1.4 million people working in the CAZ at the time of the 2011 Census, 800,000 lived in other parts of London. Many thousands of jobs in outer London depend on CAZ workers spending wages earned in central London.

Our experience in Westminster is that there are still considerable opportunities for intensification in central London. As the recent example of the Crown Estate’s reconfiguration of Regent Street - which has resulted in a 30% increase in office floorspace - demonstrates there is particular scope for additional commercial development here, particularly along key thoroughfares including Oxford Street, Baker Street and Edgware Road. There is likely to be further growth potential in opportunity areas like Victoria, Tottenham Court Road (particularly after the opening of the Elizabeth Line) and Paddington (particularly with the likely expansion of Heathrow Airport, other transport infrastructure linking West London with the Thames Valley and beyond and development in places like Old Oak). There may also be smaller-scale areas capable of intensification in the City to the north and west of Paddington. Since July 2016, Westminster’s City Plan has reflected the Council’s ambition to exceed the target of additional B1 office floorspace capacity for at least 58,000 new jobs (774,000 sqm of additional floorspace) between 2016/17-2036/37.

As suggested earlier, policy for the CAZ should go beyond protection and sustaining success to enhancing it and supporting its further growth. It covers an agglomeration of services and functions found nowhere else in the country and its continued vitality will be essential to London’s resilience



in the uncertain years to come. We want to work with the GLA to develop a strong, positive vision for the CAZ (and the West End within it) to support policies and investment to ensure it remains fit for purpose as a centre of global importance.

Employment land across the city

We support the principle of polycentricity that runs through the document. The success of the CAZ and London's other centres is inextricably linked and we definitely do not accept that their growth is a zero sum game in which success in one has to come at the expense of others. That said, it must be recognised that it is unlikely that the unique circumstances that exist in the CAZ can be replicated to encourage employment centres of the same nature in other parts of London. The parallel often drawn with the Isle of Dogs is instructive; the growth of a finance and business services sector there arose from structural changes in those sectors that required office buildings capable of accommodating trading floors which (initially at least) could not be provided in the City of London.

There is little evidence of structural shifts on a similar scale that would support a "CAZ satellite" in quite the same way, although there may be potential for growth outside central London in types of workspace that cannot be provided here – lower density campus-style business parks, for example. These are likely to be influenced by the position of places like Stratford and Old Oak between central London and growth areas beyond London in the Thames Valley and Stansted-Cambridge respectively. At a time when funding for infrastructure is likely to be restricted, the prospect of large-scale commercial development in outer London in the short- to medium-term would not justify a large-scale change in priorities in taking investment decisions. These should be informed by judgements about where these will secure the maximum return and we strongly welcome the commitment to improve transport within central London.

Housing and infrastructure investment

We agree with the importance of coordinating transport and other infrastructure investment with growth and while we note what's said about major projects like Crossrail 2 the value of smaller-scale local improvements that may help in delivering increased housing and employment capacity in areas for intensification must not be overlooked.

We also endorse the concept of joint infrastructure corridors spanning the Greater London boundary. We will want to ensure that the central London "ends" of these corridors (such as Paddington in the case of the Western Wedge) are properly planned for so the full benefits of this approach can be realised.

Green growth

We strongly endorse the document's emphasis on ensuring growth helps ensure that a green and healthy city. Tackling issues like air quality, reducing carbon emissions and climate change



adaptations raise particular challenges in central London with its already dense pattern of development, rich heritage and high costs and values. These factors are compounded by the fact that it sits at the centre of London's transport network which both exacerbates the scale and nature of the problems involved and means that tackling them has to be done on a multi-agency basis. We support what the document says about the need to 'green' the CAZ and protecting and enhancing green spaces, but the circumstances here mean that there will often have to be tailored approaches that take account of the unique circumstances here – as the City Council and its partners (including the GLA/TfL) are seeking to do through the West End Partnership.

Cultural capital

The City Council welcomes the document's focus on culture – a sector increasingly important as an employer in Westminster and a vital part of the City's "offer" to residents, visitors and businesses. It is encouraging to see this ambition running through the document. There is, however, room to ensure the various elements suggested in different sections are better aligned and to explain how they will be coordinated. The best way to ensure this may be through the Culture Strategy, which will be vital to ensuring that all parts of the GLA Group and partner organisations have a common understanding of the issues involved and direction to be taken; this will be particularly important in showing how the growth/competitiveness aspects highlighted on page 27-8 of the document and the health/wellbeing/inclusivity ones dealt with on pages 83-5 are linked and can be delivered together.

With this in mind, we would like to see greater clarity about the role of the "Cultural Infrastructure Plan" and its relationship with the Cultural Strategy – and how both these documents will in turn relate to the London Plan. We would also particularly welcome further discussions about how this work relates to other areas, like economic development proposals linked to the night time economy, which play both economically and culturally important roles.

Almost by definition, culture is fast-moving and ever-changing. It will be essential to ensure that work in this area is sufficiently flexible to keep up. There could be the risk that a cultural infrastructure plan will be based on an approach to "cultural requirements" that will be fast out of date and policies based on seeking to protect patterns and types of provision that become less relevant as time goes on.

Housing

As we have pointed out in our draft Housing Strategy, getting housing right is vital to achieving social, economic and environmental objectives at the heart of "the right kind of growth". The City Council recognises the importance of increasing and accelerating delivery of more homes to meet expected growth. Within this there is a particular need for affordable housing to meet the needs for those unable to access the market. Westminster has a particular need to ensure availability of housing suitable for and available to people on low- to average incomes who are of critical importance to the success of the local economy; this has led us to give particular attention to



innovative intermediate housing products. We therefore welcome the fact that the Mayor has brought forward the new London Living Rent product and look forward to having further discussions with the GLA about its implementation and further innovations that can help us meet a wide range of housing needs.

Delivery of housing in London – particularly on the scale required – is complicated. London is different, and there will be a need to tailor some national policies to circumstances here. The Mayor should work with the boroughs to make this case to national government and to press for the powers and flexibilities we need here to deliver. Equally, circumstances differ widely between and within London's boroughs and policy must be sufficiently flexible to deliver shared objectives in disparate circumstances. The Council notes the Mayor's intended approach to the vacant building credit in the draft Affordable Housing and Viability SPG and does not support a London-wide approach to addressing the issue. The Council considers the proposed approach to be contrary to national policy as it is for boroughs to implement this policy at a local level.

A complicated challenge

Westminster is a densely-developed area where land for housing is both relatively scarce and particularly expensive. In common with other central London boroughs, this means we do not have the space to meet all the City's housing needs within its boundaries. Providing affordable housing viably is a particular challenge and while we do have an ambitious programme to provide more homes in Westminster, as part of our estate renewal programme and through use of our planning powers to secure affordable housing (or through using commuted sums paid in lieu), it is difficult to build enough in-borough to meet increasing needs because of the viability challenges. This position will be exacerbated significantly when the requirements in the Housing and Planning Act 2016 to sell high value council housing to help finance the extension of the right-to-buy and to require boroughs to replace what's sold on a two-for-one basis come into force and may be even further complicated by the direction government eventually takes on "starter homes".

Addressing this challenge will require cross-borough approaches enabling boroughs to work together to bring together money, land and expertise to provide more housing (and affordable housing in particular), more quickly. This would be additional to delivery in-borough and would help contribute to London's overall housing delivery as well as helping to meet local housing needs.

Rough sleeping

Westminster experiences issues relating to rough sleeping on a scale not seen elsewhere in the country – in 2014/15 we saw 2,857 people rough sleeping in the City, 35% of all rough sleepers in London and more than the next seven ranking boroughs combined. Of these around 35% are UK/Republic of Ireland nationals, many of whom have multiple high level issues such as substance abuse and poor health. The remaining 65% are non-UK/Irish nationals – many of these are unable or



unwilling to secure accommodation in the UK (many have no recourse to public funds). Some are regularly involved with begging and low level crime.

Westminster City Council is pro-active in addressing the rough sleeping issues the city faces. We apply the 'No Second Night Out' principles and have enough hostel places to accommodate all the rough sleepers on our streets. However, it is our experience that a number of rough sleepers choose not to accept hostel beds – particularly if the hostel is 'dry' - instead preferring to sleep rough.

We are currently producing a Rough Sleeping Strategy setting out the approach we intend to take to the issue in the years to 2020. This sets an overarching ambition to deliver a significant reduction in rough sleeping and address the harm it brings to individuals and communities in Westminster. It sets three strategic priorities to deliver this:

- Where it is possible to do so, to take more action to prevent people from rough sleeping in the first place and provide a rapid response when people do end up on the streets.
- Supporting people who are sleeping rough to rebuild their lives – and to stay off the street.
- Tackling anti-social behavior and keeping the City safe.

It makes clear the need to work across organizational and sectoral boundaries to address these challenging issues. It also points out that while the City Council takes a leadership role in ensuring a coordinated approach, these issues are of wide concern and tackling them effectively requires London-wide (and in some cases UK-wide) action – and that there is a need for a more joined-up response to rough sleeping and greater partnership working across London and the rest of the county as the problems become more complex and resources are increasingly at a premium. It notes that there is already some highly effective joint working across London boroughs and the Mayor (and particularly highlights the No Second Night Out service).

We have recently completed public consultation on the draft strategy among health and housing agencies, local businesses and residents and the need for a stronger strategic role for the Mayor – particularly where individual boroughs take different approaches to issues - was a key theme of the response.

We welcome the commitment to the issue signaled by the document, and look forward to working with the GLA to lobby national government to ensure that work in this area is properly resourced and that effective action is taken to address rough sleeping among non-UK/Irish nationals. We also agree that the most effective action to address rough sleeping is to prevent it arising in the first place. We do not think, however, that the GLA is well-placed to actually deliver front-line services; these are more effectively commissioned and implemented locally, where there is better understanding of the nature of the issues, greater ability to bring local health and other agencies together and more scope to identify synergies with other services.



We also welcome the proposal to establish a No Nights Sleeping Rough Taskforce and to taking an active role in its work. We expect to be in a position to make a fuller contribution on the issue once our Rough Sleeping Strategy is published in early 2017.

Homelessness

While we acknowledge that dealing with homelessness is primarily a matter for borough housing authorities we strongly support consideration being given to the scope for more strategic, Londonwide approaches. The Mayor could, for example, help coordinate boroughs' procurement of temporary accommodation to help secure economies of scale and bring greater purchasing power to bear. It will also be important to ensure that London boroughs have their voice heard in ministerial discussions around homelessness policy and that a strong case is made for a fairer funding settlement for temporary accommodation and homelessness prevention in London which enables authorities to meet their statutory duties, particularly in high –cost areas like Westminster.

We would not support the Mayor seeking to introduce a level of non-statutory regulation – of amounts paid for temporary accommodation, for example. There are already well-established protocols agreed through London Councils and the Local Government Association and we can see little need to add to these.

Affordable housing

We recognise that there is a pressing need to expand and accelerate the provision of affordable housing to meet a range of needs. The particular challenges facing Westminster in doing this have been explained in the previous section.

There is a particular need in Westminster to provide housing affordable to working households on low- to average incomes – those who are vital to ensure the City's continued economic success and to deliver local public services and to making sure that as far as possible, we have mixed and balanced communities. This is why we have given particular attention to encouraging intermediate housing and have welcomed the introduction of the Mayor's London Living Rent (LLR) product. We have worked with partners to develop an innovative "accelerator" product that complements the LLR by helping tenants build up a deposit they can eventually use to buy a property in our particularly high-cost environment, a practical step that helps address the reality that traditional shared ownership approaches do not work here. We look forward to working with the GLA to drive further innovation in this area.

While we have 3,800 households on our intermediate housing waiting list – only little less than those waiting for social housing – only 1.5% of our housing stock is of this kind, compared with 25% comprised of social rented housing. For this reason we propose to change strategic planning policy to require delivery of 60% intermediate housing and 40% social rented and it is important the



London Plan policy should not be worded or applied inflexibly to prevent this kind of borough-specific response to local needs.

The draft supplementary planning guidance on affordable housing and viability was issued at the time that these comments were being prepared. We will be responding in detail to this in due course. While the draft gives clarity in many respects, it appears highly prescriptive and may not allow sufficient flexibility to take proper account of widely differing needs and circumstances across London or to promote innovation in areas like intermediate housing. London-wide assessments of what can be delivered viably will not necessarily apply site-by-site and seeking to prescribe the process for handling planning applications may mean an undue focus on methodology at the expense of outcomes. It also risks setting in stone approaches to delivery that do not keep up with developments required by national and local policy priorities; these are likely to make cross-borough approaches to delivery increasingly common and this needs to be taken into account in policy-making and target-setting. This is particularly important given the limited availability of sites and high land values in central London; policies designed to meet local circumstances should not be at risk of being deemed to be not in general conformity with the London Plan.

The complexity of these issues and the wide divergence in circumstances between (and within) boroughs means it is unlikely that a top-down, one size fits all approach to issues like development viability are likely to be effective.

Building more and increasing housing supply

Increasing and accelerating housing delivery are among the key strategic challenges facing London. To meet them it is vital that the focus is on delivery from the outset. While we welcome the creation of Homes for Londoners as a strategic focus for the GLA group's housing work, we would strongly oppose large-scale institutional changes which will simply distract from actually delivering new homes. The GLA and Government should work together to empower housing authorities to get on with forming joint arrangements to deliver; the Mayor could usefully help broker agreements, use land assembly powers, provide funding where necessary to get things off the ground – and provide a backstop monitoring and intervention power if it becomes clear that London won't deliver. This role should be light-touch and outcome-focussed, avoiding unnecessary bureaucracy or duplication. It must also take account of longer-term management and allocation issues relating to the new homes built. The Mayor should also join with boroughs in lobbying ministers for additional flexibilities to help them deliver the homes London needs, such as lifting Housing Revenue Account borrowing caps.

Private rented sector

Westminster has the largest private rented sector in London. While we are supportive of encouraging more private rented housing, there is little evidence that it requires any particular policy support here or that it will help address any particular gap in provision. It is not clear that the



case for Londonwide policies has been made, or that there is clarity about the rationale for doing so. This is may be an area where the diversity in circumstances across London makes a capital-wide approach inappropriate.

Housing in a global city

The issues around overseas ownership of housing in London are complex and the balance between the costs and benefits is not as straightforward as is sometimes presented. In 2014 the City Council published research on the issues as they relate to the “prime residential market” in Westminster (http://transact.westminster.gov.uk/docstores/publications_store/news/prime_residential_research_report_140722.pdf). This shows that for this segment of the housing market at least, it is not a simple matter of homes in foreign ownership being left unoccupied – some are occupied by staff even when the owners are absent, while others are let. Owners often make a considerable contribution to the London economy when they are present. In Westminster at least, a high proportion of prime housing is in the second-hand market and is on too small a scale to have an appreciable effect on wider house prices. The contribution that overseas investment makes to some housing development coming forward in the first place should not be overlooked. The document is right in suggesting the need for a thorough understanding of the issue before any policies are brought forward; it will also be important to take a balanced approach that avoids discouraging investment while making sure this investment supports availability of additional housing for Londoners and the capital’s wider economic success.

Other housing issues

There are a number of housing issues that are not touched on in the document that we would urge the Mayor to address:

- **Short term letting:** Residents in Westminster have unfairly suffered as a result of the last year’s deregulation of short-term letting in London. While we do not oppose people letting out a spare room, or their home while they are on holiday, our experience has been that the now practically unenforceable short term letting rules are being widely abused to the detriment of nearby residents and businesses. Deregulation has not promoted the sharing economy; rather it has encouraged properties being let on a short-term basis for 365 nights a year on a commercial basis. As well as taking invaluable housing out of the market, this can lead to anti-social behaviour and unacceptable consequences for residential amenity. The Mayor must work with boroughs to ensure the case for a change to the law to enable authorities to tackle this issue and the problems to which it gives rise is made to ministers.
- **Estate regeneration:** It should be recognised that estate regeneration has to be about both improving the quality of life of those already living on those estates and increasing housing numbers in places built at densities lower than current standards. These objectives need not conflict – particularly with high standards of design, a strategic approach to provision of



social and other infrastructure, an inclusive approach to community involvement and appropriate approaches to protecting the position of tenants and leaseholders. Given the importance of programmes of this kind to central London boroughs like Westminster (including in the Housing Zone we are working with the GLA to deliver) we would be concerned if mixed messages were given about these approaches; while dissemination of good practice would be welcome, any proposal to impose a London-wide policy approach would be inappropriate.

- **New forms of non-self contained housing:** There are new market housing products based on “co-living” – relatively small residential units inked with generous communal living and/or working space (such as those brought forward by The Collective). The London Plan could usefully set out strategic framework to encourage these in ways that ensure high standards of design, proper attention to questions of amenity and neighbourhood impact and effective management over time.
- **Later living housing:** This is an area in which thinking is moving forward faster than the planning system and where there will be a need for continued work by the Mayor and boroughs. We support the delivery of appropriate older people’s housing that will meet the needs of a range of tenures, but it must not be assumed that all of this kind of provision is economically marginal and requires an element of “subsidy” (by exempting it from requirements to provide affordable housing, for example). We continue to oppose setting targets for provision in the London Plan, as this risks ossifying current models of delivery and overlooks the fact that the appropriate level of provision in a borough is as much a function of wider issues of social and health care as it is of development.

ECONOMY

We strongly support the emphasis in the document on sustaining London’s economic success and ensuring this is addressed as a priority in discussions about the UK’s withdrawal from the European Union. This reinforces the need to ensure London remains open for business and, in particular, that the conditions for the continued success of the globally important clusters in central London are maintained, including providing frameworks for the funding and delivery of key infrastructure in places like the West End.

Infrastructure

The document’s emphasis on ensuring London has world-class infrastructure to support its competitiveness is welcome; in central London this is likely to be particularly important with regard to ensuring broadband provision of a quality fit to support growth and, at a more basic level, the electricity infrastructure required to power the CAZ.



We strongly support a more strategic approach to planning or infrastructure that is more explicitly aimed at supporting places where growth is planned and have worked closely with the GLA and the previous Mayor to press the utilities and regulators to adopt this kind of approach. We will continue to make the case, but would question the practicality of a single framework covering every form of infrastructure. The challenges involved in doing this should not be underestimated and there is a risk of the best becoming the enemy of the good.

Opportunity and economic fairness

Our experience is that getting people into well-paid, sustainable work is the best way of empowering them to make their own housing and other choices. It will be important to ensure that housing, employment, health and other social policies are properly integrated – to ensure, for example, that housing and health providers can easily refer people without work to those providing skills and employment support across organisational and sector boundaries.

Skills and careers

We strongly support devolution of skills to London. These issues are likely to become even more important given the changes to the London economy and the climate in which it will operate in coming years. It will be increasingly important to ensure that the skills system is responsive to employers and to help ensure this we would strongly urge that there is a strong sub-regional element to delivery.

Spreading economic benefits

The document perhaps rather curiously deals with tourism in the section about economic opportunity across London. We would welcome a clearer statement on the importance and benefits of tourism, a vision for the future of tourism in London (including the highlighted need for additional hotel rooms) and a joined up approach to managing the impacts of tourism. This final point is important to ensuring the sustainability of tourism which requires London being perceived as safe, clean and well-run because without these our international reputation will suffer.

There is likely to be scope to encourage hotel provision in outer London – particularly along strategic transport links to the centre. However it is important to keep in mind the way the London hotel market is segmented and that some parts – particularly higher end and luxury provision – will always require a central location, close to the central economic and administrative functions, the West End and central London's other visitor attractions. Policy should not seek to deter appropriate levels and forms of provision within the CAZ.

Night-time economy

Again, we would welcome a clearer statement and vision about London's night-time economy (NTE) (and perhaps an elaboration of what "good growth" means in this particular context). The 'night



czar' will need to work closely with boroughs to determine what the future of London's NTE looks like and how this is spatially dispersed across London. For example, the character of the well-established NTE in the West End is constantly changing – something which the City Council understands and is supporting to grow responsibly. The dynamics and market trends in other areas of London will be entirely different. It is important that the Mayor works with and not against these market trends and respects local decision making processes around planning and licensing in realising his NTE ambitions. The Council are not convinced by the arguments and evidence put forth to date in support of extension of the night-tube network and we would like the impact on local residents to be explored and protected further.

The demand for particular types of activity such as mass attendance night clubs and live music spaces is not what it perhaps was 15-25 years ago. As tastes change, we want to encourage responsible growth in the night time economy which goes with the grain of changing consumer trends rather than fight against them. We would also welcome the wider recognition of the link between safety and economic vibrancy in the night time economy which links with the section on policing on pages 79- 83 of the document. This will need to be reflected in the Police and Crime Plan as that is developed and goes to the heart of how the Mayor views the role of the Police. On this basis, we would particularly encourage the Mayor, Deputy Mayor and Mayor's Office for Policing and Crime (MOPAC) to recognise that action taken to keep London safe either by the Police, local authorities or others should be viewed as part of the basic conditions for economic growth as well as in the interests of residents and communities.

Small and medium enterprises

The analogy drawn in the document between securing affordable housing as part of residential developments and doing the same for affordable business space from commercial ones is oversimplistic. The two forms of development tend to be funded differently and have different cash-flow patterns. Securing and then making this sort of provision work is more complex than with affordable housing; there are also issues of state aid which do not arise with affordable housing.

The further alterations to the London Plan rightly allowed for flexibility around mixed use policy to support additional office provision. The City Council has followed this approach in its recent City Plan mixed use revision. It would seem perverse to introduce a requirement of this kind which could significantly undermine this fairly recently-introduced policy approach.

There is undoubtedly a need to consider approaches to encourage provision of a wider range of workspaces, including those suitable for small and medium enterprises, affordable workspace, flexible provision (in terms of size/configuration and letting terms) and co-worker space. There is a risk that these different issues will become conflated and that the policies that result are incoherent or even counter-productive. There is a need for a clear understanding of the questions each of these raise and the extent to which there are market failures justifying new planning policies; these are



issues the City Council has started discussing with the development industry and on which we would be glad to work with the GLA further.

We are interested in the concept of creative enterprise zones. We have some experience of putting in place planning policy frameworks intended to protect key creative clusters like bespoke tailoring in Saville Row and would be pleased to discuss this with the GLA.

Sub-regions

The question of sub-regional working is not dealt with in the document. In our view the current arrangements should be left as they are, leaving it to the sub-regions themselves to decide how they should be organised and allowing them the flexibility to decide on appropriate partnerships to deal with particular issues (reflecting the different communities of interest around health and economic development, for example). Sub-regions have an important role to play in some areas, having proved their worth in the review of skills and delivery of employment programmes. They provide a valuable resource for dealing with complex pan-London issues which require a degree of coordination close to the point of local delivery. Westminster is a key player in a number of very effective sub-regional partnerships such as the Cross River Partnership and Central London Forward.

ENVIRONMENT, TRANSPORT AND PUBLIC SPACE

We would generally support the environmental objectives in areas like biodiversity, open/green space, air quality, drainage and flooding, climate change mitigation and adaptation and energy set out in the document. It must be recognised that these issues manifest themselves differently in central London and that the challenges and opportunities involved in addressing them here are distinctive. While the overall objectives are shared, the means of addressing them must be tailored to local circumstances.

We would have liked to have seen a clear statement of the importance of ensuring a high quality public realm as a key part of London's infrastructure in its own right and of integrating it effectively with public transport facilities in ways that help achieve the environmental, transport and heritage policies set out in this section of the document. This approach should be supported by ideas about ways of funding and delivering a public realm that is fit for purpose in handling the additional demands growth will bring while also meeting the capital's wider priorities.

Air quality

The built environment significantly contributes to air quality problems and it would be useful to consider steps that could be taken to address this – such as home insulation or boiler scrappage. There is considerable scope to improve the energy efficiency of central London housing and in the past it has been difficult to secure funding because of perceived problems relating to multi-ownership and heritage issues. Action here could have significant effects in reducing pollution while



also helping to address issues like fuel poverty and hypothermia. It is also likely to be more cost-effective than providing hand-outs to drivers as part of a diesel scrappage scheme.

Cycling and walking

This section proposes a range of policies, measures and actions for cycling, but little to specifically support walking. These might include key walking routes, local schemes to promote walking, infrastructure (such as benches and wayfinding), interchange improvements (public realm improvements around stations), crossings and inclusive design.

Good architecture and design

We strongly support the importance of good quality design to maintain the distinctive character of London's quarters and respect its heritage. It is important to bear in mind that London's heritage of buildings, townscapes and views are an important part of its "offer" and its preservation and enhancement should be seen as part of the city's strategy for growth, not as being inimical to it.

Higher density

We support the balanced approach to density and larger buildings set out in the document. As explained earlier, we are about to start a major consultation on what constitutes "the right kind of growth" for Westminster, which will deal with many of these issues. We look forward to discussing the results of this exercise with the GLA in due course.

In common with other boroughs experiencing a significant increase in the number of basement development proposals, we have developed a suite of detailed planning policies and supporting measures dealing with construction standards on this subject. Given this, we are unsure what a London Plan policy on the subject would add at this stage. It may simply confuse the position with individual boroughs' now adopted policies. It is also questionable whether this is genuinely a strategic planning issue on which the London Plan has a role to play.

A CITY FOR ALL LONDONERS

The City Council is committed to ensuring a "City for All" based around:

- Ensuring all our communities share in the economic success of the city.
- Creating opportunities for residents, businesses and visitors to make responsible choices for themselves, their families and the neighbourhood.
- Protecting and enhancing Westminster's unique heritage so that every neighbourhood remains a great place to live, work and visit both now and into the future.



This vision underpins our approach to defining the “right kind of growth” in Westminster and we are encouraged at the extent to which these threads also run through the Mayor’s concept of “good growth”.

We strongly agree that all Londoners should share in their city’s success and that this insight must inform policies for growth. Employment is critical to this; ensuring people can get into well-paid jobs is the best way of ensuring they are able to make sustainable and responsible choices for themselves and their families – and that they will be active citizens with a share in the future of the neighbourhoods where they live and work. Supporting people into better paying and more skilled work will also help tackle issues of exclusion and inequality. For all these reasons, helping people into work should be at the centre of all Mayoral strategies – housing and transport as well as economic development.

The City Council is giving serious consideration to issues of community cohesion. We have established a cross-party Community Cohesion Commission to review the policies and practices relating to cohesion of the Council itself and its partners, including those relating to address the risk of radicalisation. Among other issues it will look at ways of empowering and improving the opportunities for all our diverse communities and to enable communities to develop greater resilience. The Commission will make recommendations to improve community cohesion across Westminster which will be approved by the council Cabinet and Leader in due course. We will be glad to share its conclusions with the GLA and to work with the Mayor and his agencies to implement its recommendations.

Healthy London

We share the Mayor’s commitment to improving health standards and tackling inequality and are encouraged by the emphasis given in the document to mental health. Priorities in these areas need to be set according to what we know about likely demographic change into the 2020s and take account of likely resource availability. We are currently consulting on a Joint Health and Wellbeing Strategy for Westminster to cover the years 2017/22, and this proposes four priorities:

1. Improving outcomes for children and young people
2. Reducing the risk factors for, and improving the management of, long term conditions such as dementia
3. Improving mental health through prevention and self-management.
4. Creating and leading a sustainable and effective local health and care system.

While we welcome what is said about Mayoral leadership, it will be important not to cut across local arrangements that work well or to duplicate what is already being done. Any further devolution in this area must have strong local and sub-regional elements to reflect the ways health services are delivered and to ensure effective integration with social care and housing provision.



Safer and more secure communities

It will be important to ensure that the distinctive needs of policing central London, which includes the nation's centre of government, many of the capital's busiest visitor attractions and the core of London's transport infrastructure, are properly reflected in the police and crime plan. In particular the resource required to police the West End is fundamentally different to anywhere else in London because of the volume of people and concentration of activity and we would urge the Mayor to recognise this in approving Policing plans. In that sense, investment in the West End is investment for London, not for Westminster as a borough.

I hope these comments are helpful.

Yours sincerely,

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