

WESTMINSTER CITY COUNCIL DRAFT CITY PLAN 2040

Heart of London Business Alliance: Shaping a world-class West End

Heart of London Business Alliance represents over 600 businesses and property owners across the West End. Our purpose is to support the commercial well-being of our members and ensure their trading environment remains integral to London's offering as a place for people to visit, live, work and do business.

The following document details Heart of London's draft response to the specific policies most relevant to the work we do in helping to shape a world-class West End.

Policy 2: Spatial development priorities: West End Retail and Leisure Special Policy Area and Tottenham Court Road Opportunity Area

Heart of London welcomes the expansion of the West End Retail and Leisure Special Policy Area (WERLSPA) in recognition of the importance of the diverse mix of uses that make up the West End. We look forward to working with Westminster City Council to deliver a balanced land use mix of complementary leisure, entertainment, food and beverage (F&B), cultural and employment services which will ensure the continued success of the West End. However, we would be grateful for further clarification on why Jermyn Street has not been included as part of the WERLSPA despite its importance as a shopping street.

We also support the diversification of the evening and night-time economy and investment in the public realm around existing clusters of night time uses. The West End's rich history of entertainment and celebration should be encouraged and reinforced. Free events in the public realm could be an accessible way to celebrate the rich history and culture of performance across the West End and serve as a good example of an activity not organised around the consumption of alcohol. For example, upper level uses could be used in connection with ground-level events in the public realm, offering opportunities for viewing of the event below. Conversely, upper floors could host events or performances that could be viewed from the street below.

Similarly, we welcome greater flexibility which could encourage extending daytime uses further into the evening to build bridges between daytime and night time economies, and offer a wider range of night time activities appealing to different groups. This might include night time uses such as pop-up restaurants or concerts.

Heart of London looks forward to the review of licensing in 2020, which could allow licensing policy and planning policy to be better integrated to support a coherent approach to the night time economy, including late opening in the West End, where appropriate.

We would recommend the development of a night time strategy, which could set out how the night time character of specific areas in the borough, including across the West End, should complement the daytime character. This could include lighting, licensing, mix of uses, entertainment and public realm. As Heart of London already has an extensive night time offer, it could serve as a pilot for a city-wide night time strategy.

Westminster City Council has been a leader in expanding the understanding of policymakers across London of the value of night time activity, but could go further to embed these ideas in its own policy. A night time strategy should consider the experiential aspects of night time; not just the economic or transactional, but the sense of adventure, encounter and spectacle that characterises London at night, when iconic neighbourhoods within central London reveal another side of their character.

Policy 9: Affordable housing

We welcome Westminster City Council's firm stance on the provision of affordable housing on-site, as it ensures that in the future, greater numbers of workers in the Heart of London's businesses will be able to live within the borough. However we feel that the provision of 35% of affordable housing on site as part of the development of larger hotels and offices is not appropriate to the West End's character as a primarily business area. We suggest that the WERLSPA should be exempt from this policy as a special case, and suggest instead off-site provision of housing, including affordable housing, which should be delivered outside the WERLSPA.

Policy 15: Town centres, high streets and the Central Activities Zone (CAZ)

Heart of London supports a greater flexibility in use of town centres; a wide range of uses has historically been central to the West End's appeal. Land use maps (available on request, as part of this Draft Response), demonstrate the variety of uses across Heart of London's area, which is significantly more diverse than retail only, featuring a large proportion of commercial floorspace on upper levels. This diversity will give the area greater resilience in the face of challenging retail conditions, and we recommend that this is not only supported, but that this model is used elsewhere in the Central Activities Zone (CAZ) to ensure that reliance on retail does not undermine the long-term viability of an area's vitality.

We recognise the contribution that active frontages and a range of scales in new development make across the area, supporting the sense of activity and quality that continues to attract and retain visitors. We would support measures that encourage greater consideration for active frontages in uses beyond retail.

Heart of London welcomes the draft new City Plan's recognition that the CAZ is made up of distinct character areas, and would support measures that enhance these characters, for example through use mix, street activity, types of retail, and public realm design (also discussed later). For example, the lively mix of advertising, lighting etc in crowded Piccadilly Circus or Leicester Square should contrast with the pared-back residential streetscape of Mayfair.

Policy 16: Markets and commerce in the public realm

We welcome resistance to new semi-permanent kiosks as these can contribute to clutter and are often low-quality retail which is not appropriate for the area's world-class status. However we would like to see the policy go further, exploring ways in which the number of existing kiosks could be reduced or moved elsewhere, for example as nested uses within new developments rather than on the street.

Heart of London agrees with the set-out conditions for premises extending into the street, but would like to ensure that this does not undermine the vitality of the area. Each case of an application by a bar, café or restaurant for tables and chairs outdoors should be evaluated on its own merit but regarded positively, with consideration for how it can enhance the public realm as well as the potential for noise concerns and clutter. We believe that people using the area, international visitors in particular, expect to be able to sit outside in cafés and restaurants when visiting a new city, and that where space is available this demand should be met.

Policy 17: Visitor economy

Heart of London welcomes the safeguarding of theatres and cinemas will allow the area to retain its character as the centre of British film and theatre, and ensure that it remains a destination with a broad offering appealing to a range of visitors. We are also highly supportive of the City of Westminster's commitment to new cultural uses in the Strategic Cultural Areas, and would support the introduction of new, complementary uses that expand the West End's cultural offer.

We support an expansion of the Strategic Cultural Area in the West End, further west along Piccadilly to encompass the St James's area.

Further, we are encouraged by the requirement for public toilets in new developments that generate large numbers of visitors, but suggest that the policy could go further to explore the potential for reopening public toilets and introducing new public toilets in the existing townscape. The area represented by Heart of London attracts large numbers of visitors each day, and well-maintained public conveniences could allow these visitors to dwell in the area for longer. Moreover, the introduction of public toilets can combat public urination and the associated cleansing and maintenance costs; a side-effect of the area's high concentration of night time uses.

As noted above, temporary events and installations could be used to animate streets, creating interest at different times of day/week/year. Consideration should be given as to how to effectively publicise such events for visitors.

Policy 18: Food, drink and entertainment uses

We welcome the protection of public houses as an essential aspect of Westminster's historic and cultural character. A visit to a pub is a central part of the visitor experience for many tourists, as well as providing an important social function for those who live and work in the Heart of London. The Best Bar None accreditation that a number of our pubs hold and the Purple Flag status that the Leicester Square area holds, reflects how responsibly run these entities are, and the applications show a sense of pride in their contribution to the functioning of the area.

It is encouraging to see that the City of Westminster also takes pride in the city's food drink and entertainment offer. However we would appreciate even greater support for the food and drink sector, as it contributes a significant amount to the West End's function as a tourist and visitor destination. We would welcome greater encouragement of the many potential benefits licenced venues bring if they are properly managed. The City Plan should be proud of the contribution that pubs and restaurants make to the West End, and to the city as a whole, and greater management of restaurants, pubs and clubs should be further encouraged by the City of Westminster.

In particular, Heart of London would like to see the City Plan's approach to food and drink better joined up to the West End's entertainment offer, for example late evening dining which could allow theatregoers to enjoy a meal after their show. This might take the form of greater flexibility in land use or licensing policy for this particular use. Rather than being a nuisance, late-night dining can offer a useful amenity and broaden the range of late-night activities open to visitors beyond alcohol.

Policy 19: Soho SPA

Heart of London supports the distinction of the character of Charing Cross Road and Shaftesbury Avenue and the larger scale of development appropriate in these areas. They play an important role as a threshold between Soho and the larger scale of the surrounding area.

Policy 20: Mayfair and St James's Special Policy Area

Heart of London welcome the merging of the two SPAs of Mayfair and St James's, in recognition of their common focus on luxury, art and craftsmanship in the retail offer, as well as high-end private members' clubs. As the voice for the private sector in this area, Heart of London looks forward to working with the City of Westminster in supporting and strengthening the character of the area through its businesses.

We are currently producing an Area Strategy informed by extensive survey work; this will consider ways to connect the area it represents which, like the Mayfair and St James's SPA, is bisected by Piccadilly. Heart of London, with offices on Piccadilly, could play an important role linking Mayfair to St James's, with the Royal Academy and Piccadilly

arcades enabling north-south movement and a greater sense of association between the areas. We would like to see Piccadilly as the heart of this area, rather than as a transport route which disrupts it.

Policy 24: Enhancing mobility

We welcome pedestrian improvements wholeheartedly, particularly given many choose to travel across the West End by foot. The new draft City Plan could emphasise the hierarchy of modes of travel to a greater extent, to reassure pedestrians. It should be clear that pedestrian priority is paramount, followed by cyclists, then public transport, and other motorised vehicular transport. Legibility is key to enabling greater pedestrian mobility; often people do not realise how the iconic spaces that make up the Heart of London link up, and signage should enable intuitive movement that enables the discovery of new routes.

Public realm improvements to enhance mobility are welcome, but the City Plan should go much further in specifying how it will improve access for people with disabilities, which is currently very limited. This could include details of step-free improvements to London Underground stations, as well as tactile paving, dropped kerbs, and crossings.

Policy 26: Servicing and freight

Heart of London is a leading voice in this area and strongly supports proposals in the consultation to work with BIDs on waste and freight consolidation. We have introduced and promoted preferred supplier waste and recycling initiatives, which last year reduced vehicle journeys by over 2,200 in the Heart of London area. We would strongly support and encourage any proposals that bring forward a joined-up approach across the West End or wider area. The public sector has the ability to elevate freight and waste collection consolidation, potentially drastically reducing the number of vehicles using the city's roads and freeing up space. Additionally, any increase in freight journeys being undertaken at night - a possibility if daytime deliveries are reduced - should be considered in relation to the West End's night time activities and economy.

Policy 31: Digital infrastructure and information and communications technology

Heart of London supports the sharing of existing facilities, but suggests that the City of Westminster could go further to facilitate this. The City of London has developed "communal entry chambers" to provide a single access for early installation of telecoms services and reduce the need for different providers to repeatedly excavate in streets and landscaped areas. It gives the City greater ability to co-ordinate digital utilities works and minimise disruption to traffic. We believe that the City of Westminster should consider taking on a similar leadership role, particularly for the West End, where an inefficient approach often results in disruption to transport and the public realm.

Policy 35: Green infrastructure

Where appropriate, Heart of London would welcome the introduction of public leisure, recreation and playable space in the West End. Much of the area we represent is characterised by play space and open space deficiency, so opportunities for rest and respite are welcome.

Policy 37: Design Principles

Heart of London strongly supports the emphasis on design that contributes to neighbourhoods that are distinctive. We also suggest that design should support and define the hierarchy of streets throughout the CAZ.

Further, these spaces should have more inclusive and accessible design where possible - a prominent modern destination for work, tourism and leisure should be accessible for people with disabilities, and we will work where possible on this with the City of Westminster.

Policy 38: Heritage

We welcome the commitment to the protection of the city's heritage assets, particularly the recognition that the wider setting is an important element, not just the building or streetscape feature itself. We will work with the City

of Westminster to preserve and enhance the local heritage within the built environment. We welcome the allowance for sensitive and subordinate alterations and extensions in recognition of the need to both densify and preserve.

Policy 39: Townscape and architecture

Heart of London strongly supports the conservation of important streetscape elements such as facades and balconies. These design elements contribute significantly to the sense of discovery that visitors, workers and residents experience when moving through the area. We are in favour of greening and public seating where it is carefully considered to frame views of historic buildings and streetscapes, and to ensure flexibility of use.

Policy 41: Public realm

We agree that a high-quality public realm, including public art, is important to the visitor experience of the West End. We support the reduction of street clutter, and its replacement with characterful and high-quality amenity such as street furniture which enhances the setting for existing buildings and strengthens their relationship to the surrounding streets. Where appropriate, the public realm should include wider pavements and benches for seating, which encourages visitors to rest, dwell and spend time in the area, soaking up its unique character. Moreover, materials used in paving and for street furniture should be easily replaceable and high quality.

High quality signage and advertising is part of the character of the Heart of London, particularly in major spaces like Piccadilly Circus where the space is defined by its iconic advertising. In such spaces, we propose that the spectacle of lighting and signage in existence should be celebrated, with new proposals enhancing these features. New signage and advertising should be carefully managed outside of these spaces to amplify the effect of these iconic spaces. Consistent pedestrian signage is also very important for legibility, and encouraging visitors and workers to walk through the area. However we would be in favour of the reduction of building-mounted signage and clutter to allow for better appreciation of the area's historic buildings and streetscape.

Lighting can be valuable in increasing a sense of safety, vital in the West End which is a night time destination. We suggest that this should be balanced with the need to light in a way that enhances local character - for example the bright neon lights of Soho and Piccadilly Circus are distinct from the heritage lighting in Mayfair - and must be sensitive to the ecological needs of the surroundings. Lighting of upper floors can add animation and interest at night, whether this is a glimpse into a private members' club or a curated window display. This increases the permeability of buildings at night, and can be appropriate where it doesn't undermine the privacy of residents or hotel guests; the City of Westminster could consider ways to introduce greater activity in upper level windows at night.

Policy 40: Density and building height

Heart of London welcomes the positive approach towards mansard extensions and recognises the need to densify, where appropriate. Similarly, we believe that new tall buildings should be assessed on a case-by-case basis, with character as a key criterion. We also caution that a long-term view must also be taken, with due responsibility for the area's heritage taking precedent over pressures to densify in the short term.

Policy 43: Security measures in high-risk development and the public realm

We welcome the draft new City Plan's emphasis on sensitively designed security measures, but suggest that the council could go further to develop a Hostile Vehicle Mitigation (HVM) strategy with a clear definition of the threat, potential attack methods and the most appropriate mitigation techniques. Mitigation might include traffic calming measures to limit vehicle approach speeds and Vehicle Security Barriers (VSB) which provide vehicle impact protection and maintain blast stand-off. Traffic calming and Vehicle Security Barrier measures should aspire to be unobtrusive and blend into the natural streetscape. Westminster City Council should consult closely with Metropolitan Police Service, BIDs, local businesses and wider partners to design such a strategy. Similarly, a CCTV

strategy could be developed in collaboration with the Metropolitan Police, with careful consideration of the division of responsibilities between business, Westminster City Council and the Metropolitan Police.

We also suggest that an area-wide approach to security measures might be more effective than setting out standards for individual building schemes, and would welcome the opportunity to contribute.