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Planning Policy Team
Westminster City Council
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By email only: west-james@westminster.gov.uk

8 April 2026

Dear Kimberley and Ben

RE: New City Plan – Direction of Travel Document, on behalf of the Westminster Property Association

I am writing on behalf of the Westminster Property Association (“WPA”) in respect of Westminster City Council’s Direction of Travel Document for the new City Plan (February 2026).

The WPA and its members are committed to supporting the long-term attractiveness and vibrancy of Westminster, the West End and the wider CAZ, as the heart of London’s World City offer. That includes its role as a world-leading office location, its globally attractive retail and visitor offer, whilst being home to 211,500 residents.

Our latest research, delivered in partnership under London Property Alliance (“LPA”) highlights London’s continued global competitiveness, including its position as Europe’s leading destination for international investment and the sustained demand for high-quality commercial space [Global Cities Barometer](#) (March 2026). Our [Space for Change](#) report similarly shows that Westminster continues to experience strong occupier demand and tightening supply, particularly for modern, sustainable workspace.

This workspace is central to Westminster’s, and indeed the capital’s, success. Offices are the infrastructure that anchors high-value, high-skilled employment in the borough. They accommodate the global companies, creative industries, professional services and fast-growing firms that underpin Westminster’s economic development. These jobs support thousands more across supply chains, hospitality, retail and culture, and generate funds that contribute to the delivery of amenities and local services relied upon by residents and communities.

A strong office market is therefore directly aligned with the Council’s priorities. It supports access to good-quality employment opportunities, sustains the vibrancy of high streets and cultural institutions, and underpins the financial resilience of the borough. Investment in new and refurbished workspace also delivers wider public benefits, from improved public realm and greener streets to more energy-efficient buildings that help meet Westminster’s climate ambitions.

With this in mind it is essential that Westminster’s next City Plan takes a bold, pro-growth approach and the WPA welcomes the opportunity to engage with the City Council on the important process of developing the Plan. Ensuring that Westminster has a strong, clear Plan in place will help guide decisions and provide clarity to developers and investors. It will help to prioritise the economic role of the CAZ, and Westminster as the powerhouse of the London economy and a key driver of growth for the wider UK.

The next City Plan should be clear in actively championing investment in Westminster’s buildings and public spaces, so that officers are empowered to make swift and commercially informed planning decisions.

Whilst not a formal consultation document, we thought it would be beneficial to outline our key thoughts on the Direction of Travel Document. We would welcome the opportunity to discuss this with officers further and continue our positive engagement. We previously formally responded to the early engagement on the new City Plan in November 2025, and this letter builds upon the points formally raised in that response (attached separately to this letter for reference).

Vision

The WPA supports the broad Vision outlined in the Direction of Travel Document, and the reference to supporting economic vitality. However, we would urge the Vision goes further, and as set out in our previous submission appended, seek to:

- a) Promote the economic role of the CAZ, and Westminster as the powerhouse of its economy and Westminster as a Global City;
- b) Actively champion investment in Westminster's built environment and public spaces to attract and retain world class businesses;
- c) Support the creation of best-in-class commercial buildings that will sustain and enhance central London's role as a leading, globally competitive location for office occupiers, including provision of best in class and innovative workspaces in the core CAZ. Ensuring high quality space that addresses demand and the expectations of occupiers should be a specific objective of policy;
- d) This should include setting clear, achievable targets to increase the supply of prime workspace, reversing the decline in recent years;
- e) Additional flexibility should be permitted beyond the core CAZ, especially in secondary locations including on the fringes of the CAZ and where distant from the Elizabeth line, for changes of use or redevelopment of offices which no longer provide the right types of space in the right places;
- f) Build investor confidence in Oxford Street as the UK's premier retail destination, underpinned by offices and leisure space, working closely with the OSDC;
- g) Rebalance retrofit-first policy to continue to encourage sustainable buildings, including the replacement of existing buildings where existing structures can no longer meet modern environmental or commercial standards; and
- h) Celebrate and draw upon Westminster's historic features, in a flexible manner which enables the repurposing of buildings.

In particular, it is essential that any Vision acknowledge Westminster's crucial role in sustaining the role of London as a Global City; and within that the role that commercial buildings within the CAZ play.

Aspiration 1

In respect of point (ii), the WPA supports in principle a mix of uses (residential and commercial) across the CAZ, albeit it should be made clear that commercial land uses remain the priority land use.

In respect of point (iii), should commercial uses be required to contribute towards delivering mixed-use communities, including relevant contributions towards affordable housing, this should only be where:

- a) Any policy requirements are proportionate, at a relatively low level and rigorously tested to ensure that they do not hinder the drive for commercial growth which should be a key strategic priority, particularly for the CAZ.
- b) Any contributions should be via a payment in lieu and should not be required to be provided in kind, either on or off site (and no justification should be required to agree a payment). Physically delivering residential alongside commercial can significantly affect the viability and deliverability of schemes, and it is essential that any policy requirements do not undermine the ability for the CAZ to continue to support economic growth. Pooling contributions for delivering comprehensive affordable housing elsewhere in the borough is likely to be more effective in meeting housing need.
- c) Should any contributions towards affordable housing be required from commercial development, there should be no requirement to deliver affordable workspace. The market already provides low-cost office accommodation, both within the CAZ and beyond. Subject to impact on scheme viability, tariff-based financial contributions could be secured and pooled to fund targeted, borough wide programmes that address skills and training needs.
- d) Any contributions towards the provision of affordable housing should be explicitly recognised as a public benefit of commercial proposals.

In respect of point (iv), the WPA agrees that all contributions should be set at a level which enables development to come forward. Affordable homes should be a priority, as should the development of commercial floorspace within the CAZ.

Aspiration 3

The WPA supports the overarching aspiration to “*support the invaluable contribution Westminster makes to the national economy, by fostering continued economic growth and a range of employment opportunities*”.

We strongly welcome the recognition (page 10) of the changing working practices and demands for office space since the Covid 19 pandemic, to which providers of office space have had to respond. It is vital that planning policy supports providers in ensuring Westminster’s office space, as key economic infrastructure, continues to address occupiers’ needs as they evolve.

Therefore, in respect of point (i), the WPA supports greater flexibility for the adaptation of existing office buildings to a wider range of commercial uses. This flexibility should also extend to the redevelopment of existing office buildings (not just adaptation), where this can be justified due to market, structural or environmental needs.

In respect of point (iii), the WPA supports the acknowledgement that Opportunity Areas, town centres and core commercial areas of the CAZ can deliver economic growth in the city, and that in such sites redevelopment and increased density may be suitable. Greater emphasis should be placed on the role which the core CAZ has on supporting Westminster’s economic growth and Global City status.

We also suggest that the City Plan review continues to provide a flexible and supportive approach to the use of land use swaps in appropriate circumstances, as a key tool to support the efficient use of land and economic development. This should include ensuring that affordable housing policy is not applied in such a way that it prevents the relocation and consolidation of important protected land uses.

Aspiration 4

In respect of point (iii), we question why increased densification is limited within this aspiration to the West End. The Opportunity Areas, and the wider CAZ, can contribute to Westminster’s growth and densification and growth should not only be concentrated around the West End.

Aspiration 5

In broad terms, the WPA supports the overarching aspiration to support the city in delivering the goal of net-zero carbon. As referred to in our November 2025, the WPA continues to encourage the City Council to reconsider parts D and E of City Plan Policy 43, which represent a significant constraint on growth through the restrictions they place on the repurposing and replacement of buildings, and the complexity, cost and uncertainty it imposes on applicants.

On point (iii) in particular, it is critical that any policy not only balance climate change mitigation/adaptation with objectives such as heritage and townscape – sustainable economic growth must be a key priority for the City when considering development proposals, particularly given the CAZ’s crucial role in supporting the London and national economy.

On point (i), we note that the net-zero carbon objective has not been defined. Any objectives/requirements must be appropriately set so that they do not act as a brake on development.

Summary

We are delighted to continue to be involved in discussions with the City Council on behalf of our members on the emerging City Plan. Alongside a copy of our previous 2025 submission we have included a copy of our Manifesto for Westminster which references many of the points listed above.

Yours sincerely



Charles Begley
Chief Executive, Westminster Property Association