

City Management Plan workshop briefing notes

Offices

PART A OFFICES INSIDE AND OUTSIDE CAZ

What are the issues?

Offices are supported as a strategic use within Westminster. Our office stock is the largest in the UK and long term trends suggest that unlike most other places in the UK developers would rather bring forward office floorspace than any other use. The City Council has a long standing policy approach (as set out in the current Unitary Development Plan 2007 (UDP)) of directing offices to the Central Activities Zone (CAZ) and its Frontages, and to the Paddington and North Westminster Economic Development Area. This policy approach aims to maintain the residential character and function of areas outside the CAZ. For this reason offices are not considered an appropriate use outside CAZ and are only likely to be acceptable to facilitate improved accessibility and where the office increase is required for office based local services.

As required by the London Plan (February 2008), the Core Strategy Publication Draft 2009 designates a new CAZ boundary for Westminster, which is broadly in conformity with the indicative boundary in The London Plan and is larger than the current CAZ boundary (see figures 1 & 2 overleaf).

Based on their existing character and function, scale and intensity of land uses and type and mix of land uses, locally distinctive areas have been identified within the CAZ and are subject to their own policy framework. These areas are as follows:

- Core Central Activities Zone (including the West End Special Retail Policy Area)
- Paddington Opportunity Area
- Victoria Opportunity Area
- Tottenham Court Road Opportunity Area
- Marylebone and Fitzrovia
- Knightsbridge
- Pimlico
- Metropolitan Open Land

The Core Strategy Publication Draft 2009 directs new office development to the Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, specified locations within Marylebone and Fitzrovia, and the North Westminster Economic Development Area.

In the CAZ, away from the designated shopping centres and the locations where offices are directed, areas are predominantly residential and the ongoing aim is to ensure that these existing residential areas are not subject to encroachment from office development. It is acknowledged, however, that there are existing office based businesses in Marylebone, Fitzrovia, Pimlico and Knightsbridge, that may want to expand, or new small office based businesses who may be able to find suitable accommodation on the upper floors of premises in the designated shopping centres, where these are not in residential use. Such opportunities may be limited. However a detailed policy approach is still required to ensure that such development is managed in the most appropriate way.



City of Westminster

PLANNING & CITY DEVELOPMENT

6pm to 9 pm, 28th July 2009

17th floor City Hall - Committee Rooms 6 & 7

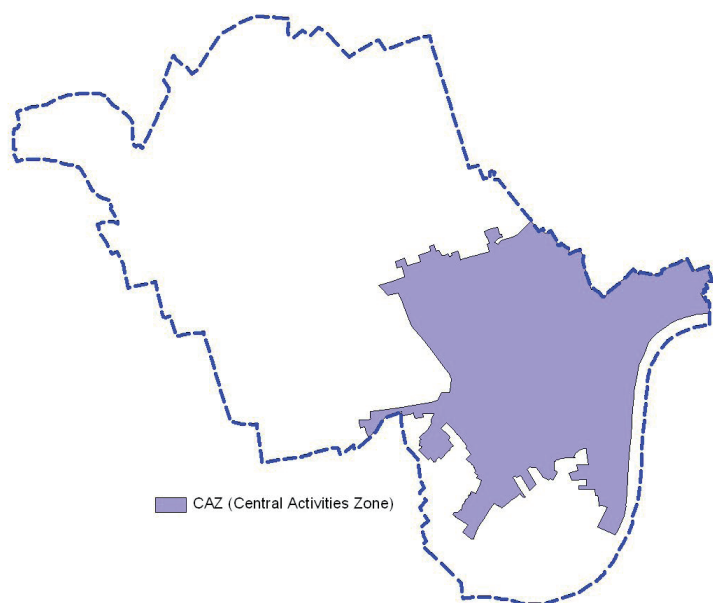


Fig 1: CAZ Unitary Development Plan

What have you told us?

- A range of office floorspace would be more appropriate outside the Core CAZ.
- Policies should be interlinked and reflect the balance between commercial and residential uses inside and outside of CAZ.
- Any policy should not be as rigid as the current UDP approach.
- There should be 'qualitative criteria' for commercial floorspace.
- Commercial activity in North and South CAZ should be discussed at these workshops.
- The City Management Plan should encourage and support the provision of new commercial floorspace (offices and residential) in the CAZ.
- Pimlico is very residential and would not be suitable for lots of commercial activity.

Policy Context

PPG 4: Industrial, commercial development and small firms (1994), Draft PPS4, Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies (May 2009). This underlines the need for local planning authorities to plan positively for economic development and emphasises the contribution that planning makes to delivering

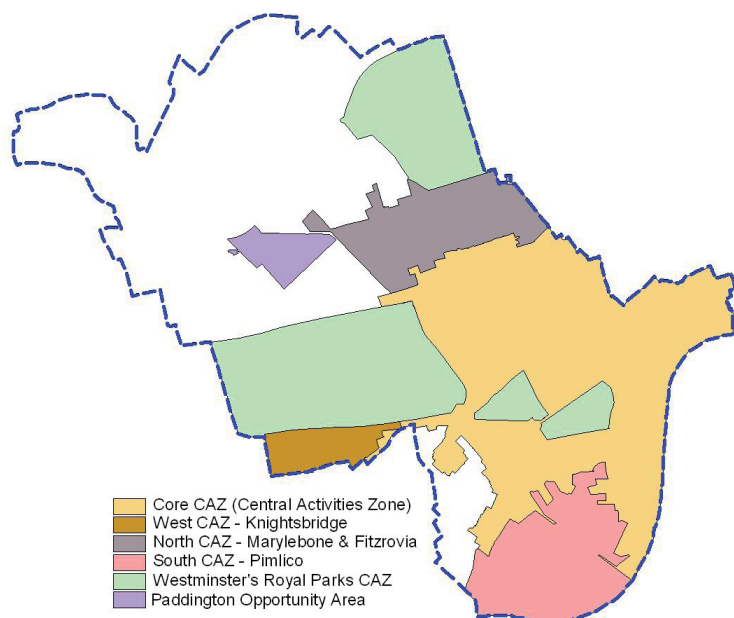


Fig 2: CAZ Core Strategy Publication Draft 2009 (subject to agreement)

jobs, investment and improved productivity. It guides all commercial development to town centres. The London Plan contains the following relevant policies 3B.2 Office Demand and Supply, 5B.1 The Strategic Objectives for North London, 5G.2 The Strategic Priorities for North London, 5G.3 Central Activities Offices, 5G.5. Predominantly local activities in the Central London Activities Zone.

Current Unitary Development Plan Policy 2007

STRA 3 seeks to protect and enhance the strategic role, historic character, social and cultural importance of the central part of Westminster through the designation of a Central Activities Zone and Central Activities Zone Frontages.

COM 1 (A) states that office development will be granted permission in the Central Activities Zone and Central Activities Zone Frontages, Paddington Special Policy Area and North West Westminster Special Policy Area (NWWSPA).

COM 1 (B) states that elsewhere proposals for office development will be granted where:

1. The site is already in lawful office use
2. The increase in office floorspace is related to providing accommodation for office-based local services and/or improving access for those with disabilities

3. There is no loss of residential accommodation and no adverse impact on residential amenity
4. There is no loss of local service activities.

H 3 (C) Inside the CAZ proposals to convert buildings in office use into permanent housing will generally be acceptable.

Policy H 3 (D) Outside the CAZ, the City Council will require land or buildings in commercial use to change only to housing, except in the NWWSPA where both housing and appropriate commercial uses will be allowed. Changes between commercial uses at basement and ground floor levels will not be resisted, subject to other policies in the UDP.

Core Strategy Publication Draft 2009 (subject to agreement)

The Core Strategy Publication draft directs new office development to Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, specified locations within Marylebone and Fitzrovia and the North Westminster Economic Development Area.

The locations specified for residential and a range of commercial uses in Marylebone and Fitzrovia are as follows:

- Edgware Road
- Baker Street
- Marylebone Road
- Portland Place
- Park Crescent
- Great Portland Street

Further information

Adopted Unitary Development Plan (January 2007)

Core Strategy Publication Draft (July 2009)

The London Plan – Consolidated with Alterations Since 2004 (February 2008)

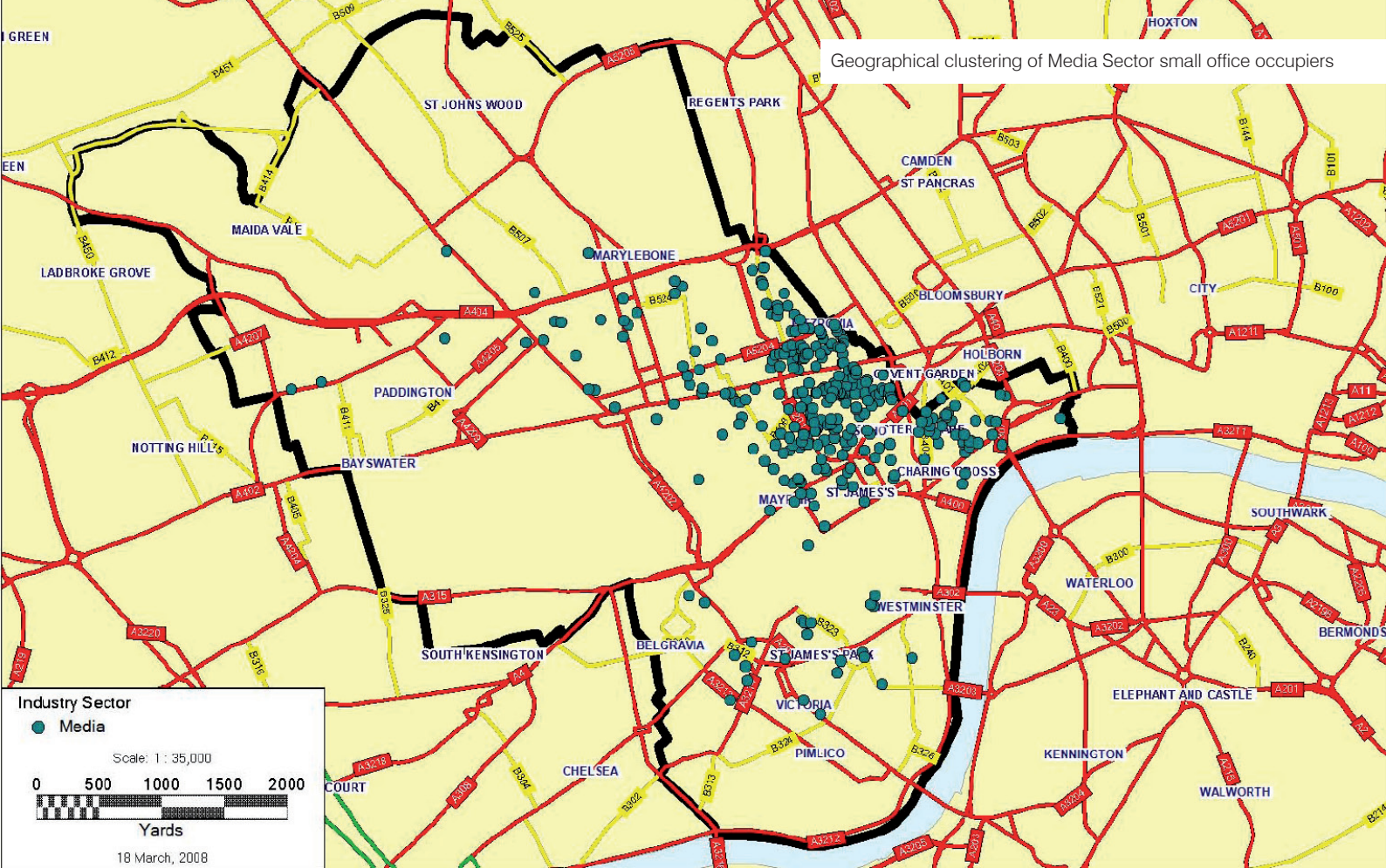
PART B SMALL OFFICES

What are the issues?

In Westminster small offices perform a number of functions and are not just occupied by start up businesses. The media industry is the business sector occupying most small offices, closely followed by the financial, property and professional services sectors. Almost 70% of small offices are inside the Central Activities Zone.

Aiming to maintain the vitality and diversity of economic activity in Westminster, Adopted Unitary Development Plan (UDP) Policy COM 4, seeks to protect small offices (less than 250 sq m) inside the Central Activities Zone and in the North West Westminster Special Policy Area.

The small office market in Westminster is complex and to gain a full understanding of the all the issues involved, and to assist in the preparation of our Core Strategy and City Management Plan, the City Council commissioned DTZ in December 2007 to undertake a detailed study of this market. Their main findings show that there is an adequate supply of small offices in Westminster. However, looking to the future, rental values in parts of the city (particularly in the CAZ), and conversion to residential use, may be a threat to future supply. DTZ consider that, as the provision of small offices are part of the natural life cycle of a building, Policy COM 4 may be an exacerbating pressure (by stopping the churn) in supporting the upward trend of high rents, in particular putting pressure on price-sensitive occupiers in the CAZ. DTZ conclude that COM 4 is not an effective way of achieving the objective of maintaining small office capacity and that protection of small offices should be removed. However, they consider that if the City Council decides to continue with this policy, it should be revised. The questions contained in 'What should we do', are based on DTZ's recommendations continued in the study for small offices inside the Core CAZ. Small offices inside the North Westminster Economic Development Area are dealt with in the briefing note for that area.



What have you told us?

- The small office approach should be revised as there is no shortage in Westminster and there has been an increase in serviced offices.
- The policy restricts viability of development and therefore wider benefits to the community.
- No evidence justification for retention of UDP Policy COM 4.
- Concern about restricting uses of buildings to creative industries and affordable businesses.
- Support for the creative industry sector.
- Many small and medium sized businesses are in need of upgrading but redevelopment would make the use of this space unviable. The introduction of a higher value use such as residential could help enable development.
- More should be done to encourage and support small businesses.
- 'Incubator' units are important to the local economy and there is a lack of these facilities in Westminster.
- There is a high vacancy rate of small offices in Covent Garden.
- Proposals for new business floorspace outside the CAZ should be taken on a site by site basis.

Policy context

PPG 4: Industrial, commercial development and small firms (1994) Draft PPS4, Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies (May 2009)

London Plan Policy 3A.17 Addressing the needs of London's Diverse Population, Policy 3B.2 Office demand and supply, Policy 3B.8 Creative Clusters, Policy 5G.3 Central Activities- offices
Current Unitary Development Plan Policy 2007
STRA 5 includes aims to support and encourage growth in Westminster's economy, particularly where such growth is environmentally sustainable and to increase residents' opportunities and improve access to employment

Policy COM 4 (A) seeks the retention of small offices where they make a particular contribution to the character and function of Central Westminster, where the premises have been in use for small offices for a period of ten years or more or because of their size, layout and structural condition they are likely to be particularly suited to such use.

Policy COM (B) resists the loss of small offices within the North West Westminster Special Policy Area.

Policy COM (C) aims to ensure that new office development is built so as to facilitate the sub-division of the buildings to enable provision of a range of small office accommodation.

Core Strategy Publication Draft 2009 (subject to agreement)

New office development will be directed to Paddington, Victoria and Tottenham Court Road Opportunity Areas, the Core Central Activities Zone, specified locations within Marylebone and Fitzrovia, and the North Westminster Economic Development Area.

Where appropriate, the council will request a range of business floorspace including workshops and studios.

Further information

Adopted Unitary Development Plan (January 2007)

Core Strategy Publication Draft (July 2009)

The London Plan – Consolidated with Alterations Since 2004 (February 2008)

Creative Industries Study (October 2007) GVA Grimley LLP & Burns Owens Partnership

Commercial uses and the Historic Environment (January 2008) Drivers Jonas

A study of small offices in Westminster (June 2008) DTZ Research
<http://www.westminster.gov.uk/services/environment/planning/ldf/consultantsreports/>

PART C CENTRAL LONDON ACTIVITIES

What are the issues?

The UDP contains an established policy approach which aims to protect those activities which contribute to London's world city and capital city functions within the CAZ and to guide appropriate Central London Activities to the CAZ, to foster London's international, national and regional roles. Appendix 1 attached to this briefing note shows a list of these activities (based on Table 1.1 in the UDP).

The aim to ensure Westminster remains central to London's world class city status remains an important policy objective. However, we are not at this stage intending to include a list of activities in the City Management Plan. Policies for directing Central Activities such as offices; retail; visitor, leisure and cultural provision and other special uses will be included in the Core Strategy Publication Draft 2009 and briefing notes have been prepared to cover these topics for debate in the City Management Plan workshops. The Core Strategy Publication Draft for buildings and uses of international and national importance is set out below (see heading Core Strategy Publication Draft 2009).

Government advice is clear that local planning authorities can only manage the use and not the specific users of premises. Although government departments and national and international headquarters and facilities and establishments connected with the communications, publishing advertising and media are Central London Activities, there is no specific Use Class for these activities and therefore no specific protection. Under the Use Classes Order such buildings are normally considered to fall within Class B1 offices, and therefore if the specific user

moves out, we cannot require that a similar occupier moves in.

Private members clubs are a traditional use and can play an important role in supporting other activities in Westminster. These are considered to be a commercial use, and are sui generis uses in accordance with the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

What have you told us?

- Change of use applications should ensure that the loss of the premises would not jeopardise the ability of the CAZ to attract nationally and internationally focused businesses.
- The role of court facilities should be explicitly recognised.

Policy context

The relevant policies in the London Plan are as follows: 5G.2 Strategic priorities for the Central Activities Zone, 5G.3 Central Activities: Offices, 5G.5 Predominantly Local Activities in the Central Activities Zone.

Current Unitary Development Plan Policy 2007

STRA 1 aims to foster Westminster's key 'world class' city roles as a centre for international organisations, headquarters, business services, housing, retailing, medicine, education and other professions, media, arts, culture, entertainment and tourism, and to allow sustainable developments that promote them.

STRA 2 seeks to foster Westminster's capital city roles as the seat of Government and national administration and as a centre of national professional and cultural excellence; and to allow sustainable developments that promote them.

STRA 14 aims to protect and provide housing.

CENT 1 (A) Planning permission will not be granted for development that results in the loss of Central London Activities within the Central Activities Zone where these activities contribute to its character and function.

CENT 1 (B) Development for Central London Activities within the Central Activities Zone will be encouraged where appropriate to the character and function of particular areas within the Central Activities Zone.

CENT 1 (B) Existing Central London Activities of national or international importance outside Central Westminster will be protected and supported where these do not harm residential amenity or local environmental quality.

Appendix 1 attached to this briefing note shows a list of Central London Activities (based on Table 1.1 in the UDP).

Core Strategy Publication Draft 2009 (subject to agreement)

Uses of International and/or national importance and the buildings that accommodate them will be protected throughout Westminster and new international and nationally important uses encouraged within the Core Central Activities Zone.

PART D OFF-SITE PROVISION OF HOUSING REQUIRED BY MIXED USE POLICY

What are the issues?

It is important that the balance of homes mixed with commercial uses is at least maintained in Westminster's CAZ. This will help to protect and enhance the unique character of Westminster's CAZ that makes it such an attractive location for businesses and visitors alike. The most appropriate way to do this in Westminster is to request an equivalent amount of residential floorspace when increases in commercial floorspace are proposed. Requiring residential floorspace as part of commercial schemes has been a longstanding and successful UDP policy and now forms part of Westminster's Core Strategy (Publication Draft, February 2009).

When it is agreed that provision of on-site residential accommodation is not appropriate and practical, other options for off-site provision will need to be considered, including where it should be located, and by what means it should be secured. In order to protect the mixed use character of Westminster's CAZ, including the areas and streets within it, the Council believes that off-site housing should be provided in the vicinity of the commercial site, on existing commercial sites. Under the UDP policy, off-site provision has been achieved via land use swaps. If land use credits are also to be used in the provision of off-site housing, the Council needs to ensure that the system is robust, and that the outcome is better than on site provision in terms of mixed use character and quantity and quality of housing provided.

Under the UDP policy, when off-site provision is not feasible, uses which serve the public may be considered to offset the residential requirement. Where

this is not possible, a financial contribution to the Affordable Housing Fund is secured. In terms of future policy, where on or off-site provision is not feasible, a financial contribution to the Affordable Housing Fund needs to be requested; and in the case of larger schemes, it may be that other uses such as social and community, or cultural uses could also be secured.

The City Council currently uses gross external floor-space to calculate mixed use requirements, which includes ancillary areas such as service space and internal plant. Given the need for more sustainably designed buildings and the need to accommodate sustainable technologies, it may be timely to review the approach taken to certain types of plant areas.

What have you told us?

- Developers and landowners have informed the council that they would like to be able to use land use swaps and land use credits to deliver residential obligations off-site without recourse to the 'appropriate and practical' test for on-site provision.
- Residential floorspace required by the Mixed Use policy should be permitted to be located anywhere in the city. This would enable housing to be maximised on the most suitable sites and would allow more effective land use swaps. This would increase the supply of housing in the Borough as a whole.
- Practical and appropriate should be clearly defined including reference to quality and function of proposed uses, external and internal design considerations, quality of residential amenity and relationships with adjoining commercial uses.

- Seeking housing provision within the 'vicinity' of the application site is too restrictive and not in general conformity with the London Plan.
- In the case of a land use swap, the Council should require that the residential component be provided in advance of the commercial development to ensure the opportunity for additional housing is not lost.
- There should be scope for the 'swap' site to be in the vicinity or elsewhere within the CAZ providing the candidate site is suitable for residential use.
- Where new development provides important community benefits, for example, through the redevelopment and delivery of modern employment space that utilises and maximises under-used employment land, then the requirement to provide affordable housing as part of the proposal should be negotiated in the context of the scheme's viability and deliverability.
- The council should work with stakeholders to find design and other solutions to constraints on provision.
- Residential floorspace required by the Mixed Use policy should be required to be on site, or if not possible in the vicinity.
- The removal of the vicinity test would remove significant uncertainty and free up market response, over time creating better residential and commercial buildings.
- Problems of polarisation of people and uses if residential components were to be allowed to be provided elsewhere in the city, as dwellings could be built on cheaper land within the city.
- Positively encourage swaps as a matter of policy would enable the market to respond quickly.
- Residential land use credits would facilitate the provision of residential floorspace required by the Mixed Use policy.
- Viability is the crucial factor.
- Accept a lower provision of residential floorspace if the percentage of affordable housing to be delivered is higher.
- We should be flexible about off-site provision but keep mixed use in CAZ – don't just dump affordable housing in the north.
- If onsite provision is proved unviable, offsite provision or payment in lieu should be considered acceptable.
- Any policy should also ensure that successful small businesses are able to expand without the need to deliver residential floorspace.
- Plant should be excluded from land use calculations.

Policy context

London Plan policy 3B.3 requires a mix of uses including housing to be provided wherever there are increases in office floorspace in the CAZ. The Plan goes on to say that housing 'swaps' or 'credits' between appropriate sites within or beyond the CAZ could complement the implementation of the mixed use policy.

- A land use 'swap' is where a developer provides an off site residential development to satisfy the housing requirement generated by a specified office/commercial development. The planning applications for the two sites are considered at the same time and are linked by S.106 agreement or Grampian condition.
- A residential land use 'credit' is where new off-site residential is provided in advance by a developer on the basis that it will satisfy the residential requirements of the Mixed Use policy generated by future commercial developments.

Current Unitary Development Plan Policy 2007

Mixed Use policies CENT 3/COM 2 require on site residential when appropriate and practical; where not it will be required on another site in the vicinity; where this is not practical- other mixed uses should be provided on site; if none of the above are appropriate, a financial contribution to the Affordable Housing Fund will be sought.

COM 3 sets out the parameters and conditions for land use swaps. They must be in the vicinity, the character of the locality must be maintained, and the residential accommodation should be better quality and at least the same in terms of quantity.

Core Strategy Publication Draft, February (Subject to agreement)

CS17 requires in commercial developments over 200sqm (or 400 sq m for A1 retail) an equivalent amount of residential floorspace to be provided on-site where it is appropriate and practical. Where not, a cascade of other options, including the use of land use swaps and credits, will be considered as detailed in the City Management Plan. The Opportunity Areas and the Primary Shopping Frontages have slightly different approaches.

Further information

Adopted Unitary Development Plan (January 2007)

Core Strategy Publication Draft (July 2009)

The London Plan – Consolidated with Alterations Since 2004 (February 2008)

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Appendix 1. Appropriate non-residential activities for central Westminster (see policies CENT 1 - CENT 3). Examples of activities particularly appropriate to Westminster are shown in *italics*.

Central London Activity	Appropriate in CAZ/ CAZ frontages	Other UDP Special Policy Area Designation	Comments
Those connected with the State and Government: <i>Royal Palaces, Parliament, Government Departments, Law Courts</i>	Yes	No	
Diplomatic representations including <i>Embassies, High Commissions and Agencies</i>	Yes	No	Particularly concentrated in Mayfair, Belgravia and Portland Place
<i>National and International</i> headquarters and associated offices connected with finance and business: <i>Headquarters of clearing banks, overseas banks, merchant banks, venture capital companies, insurance companies</i>	Yes	Yes	Paddington SPA (see chapter 5)
National and international headquarters and associated offices connected with trade: Export and import merchants, centres of specialised trades	Yes	Yes	Paddington SPA (see chapter 5)
Professional bodies, institutions and associations: Headquarters of institutes or associations and offices for regional and nation-wide practices	Yes	Yes	Portland Place SPA (see Policy COM 8 and COM 9) / Paddington SPA (see chapter 5)
Facilities and establishments connected with the communications, publishing, advertising, media and cultural sectors of regional, national and international importance: internet, e-commerce companies	Yes	Yes	Creative Industries SPA (see policies COM 8 and COM 9)/ Paddington SPA (see chapter 5)
Shopping, including specialist retail outlets of regional, national and international importance: <i>Department Stores, specialist shops, flagship stores, auction rooms</i>	Yes	Yes	Prime frontages and Shopping Centre hierarchy policies (see policies SS 4 - SS 11)/Paddington SPA (see chapter 5)
Centres of excellence for higher education and research: Universities, specialist colleges	Yes	Yes	Arts, Culture, Education SPA (see policy TACE 7)
Medical establishments of regional, national and international importance	Yes	Yes	Also found in the north-west and south east of the City, Harley St SPA (see policies SOC 1 and SOC 5) and Paddington SPA (see chapter 5)
Legal and professional services: <i>Magistrates Courts</i>	Yes	No	Paddington SPA (see chapter 5)
Arts, culture and entertainment uses, including museums, art galleries, libraries, theatres, concert halls, clubs and cinemas of regional, national and international importance: London Clubs of St James's, casinos	Yes	Yes	Arts, Culture, Education SPA. (See policy TACE 7)/Paddington SPA (see chapter 5). West End, Edgware Road and Queensway/Bayswater Stress Areas (see policies TACE 8 to 10)
Specialist industrial activities associated with other central London activities, including clothing, fashion trades, media, printing and retail services: Wholesale showrooms of regional national and international importance	Yes	Yes	Creative Industries SPA (see policies COM 8 and COM 9), East Marylebone SPA (see policy COM 12)
Churches and other religious centres and places of assembly of regional, national and international importance	Yes	No	
Tourism facilities including hotels and conference centres	Yes	Yes	Paddington SPA (see chapter 5)
Transport facilities particularly for public transport of regional, national and international importance: <i>mainline rail and other stations/interchanges</i>	Yes	No	Paddington SPA (see chapter 5); Marylebone mainline station outside CAZ
Activities supporting the use and enjoyment of the River Thames	Yes	Yes	Thames SPA (see chapter 11)
Other uses providing essential support services and facilities for people living, working and visiting central London	Yes	No	Generally appropriate throughout Westminster. Several UDP chapters relevant (see Table 1.2)

The agenda for the Offices workshop is as follows:

Welcome and introduction

by Councillor Moss – 5 mins

PART A - OFFICES INSIDE AND OUTSIDE CAZ

1. Do you think there should be qualitative criteria for commercial floorspace (e.g. amenity, function, usable space for occupier requirements and sustainability), similar to those required for housing, or would this constrain development?

Within the CAZ

2. Outside of those areas within in the CAZ where we propose to direct office development, should we allow extensions for office purposes where: the site is already in lawful office use and where this does not affect the character and function of the area?

3. Should we allow new offices on upper floors of premises in the designated shopping frontages to encourage small office occupiers in these locations or should they be used solely for retail uses and housing?

4. In the Core CAZ offices can change to other commercial uses (subject to amenity considerations) Do you think that this approach should be taken in:

- Marylebone and Fitzrovia
- Pimlico
- Knightsbridge?

or given the residential nature of these areas do you think that offices in these areas should only change to housing?

Outside CAZ

5. Do you consider that we should maintain our existing UDP approach to offices outside the Central Activities Zone and only allow small extensions to lawful office premises providing the accommodation is for office based local services and/or improving access for those with disabilities?

6. Do you consider that outside CAZ, commercial uses should only change to housing?

7. Should we allow new offices on the upper floors of premises in the designated shopping frontages to encourage small office occupiers in these locations or should they be used solely for retail uses and housing?

8. Are there any issues that have not been covered in this part of the workshop that you would like to raise?

9. Are there issues for this topic that the Council should be aware of in its lobbying process?

20 mins

PART B - SMALL OFFICES

1. Should we remove protection for small offices in Core CAZ? If not:

2. Should there be more clearly defined boundaries and applicability such as:

- A reduction in the definition of small office from 250 sq m to 150/200 sq m?
- Only protect small offices in buildings under 500 sq m or 1,000 sq m?
- Protect small offices only in areas with the highest density of start up companies or where the small offices (or occupiers such as the creative industries) particularly add to the character and function of the area?
- Not allow a change of use of small office buildings into housing?

3. Are there any issues that have not been covered in this part of the workshop that you would like to raise?

4. Are there issues for this topic that the Council should be aware of in its lobbying process?

10 mins

PART C - CENTRAL LONDON ACTIVITIES

1. Should we protect the following Central London Activities: government departments and national and international headquarters; facilities and establishments connected with publishing, advertising and media and if so how?

2. Should private members clubs be protected in areas other than St James's?

3. Are there any issues and activities that have not been covered in this part of the workshop that you would like to raise?

4. Are there issues that the Council should be aware of in its lobbying process?

10 mins

PART D - OFF-SITE PROVISION OF HOUSING REQUIRED BY THE MIXED USE POLICY

Alternatives to on-site provision: Having taken into account all the consultation to date, the Council's preferred way forward is as follows:

Where it is not appropriate and practical to provide residential units on-site in commercial schemes in the CAZ

- i. The residential accommodation will be provided on another commercial site in the vicinity.
- ii. Off-site provision beyond the vicinity of the development must be provided within the Core Central Activities Zone and will only be acceptable where the residential provision is substantially greater than could be provided on a site in the vicinity and of a higher quality than would have been provided on-site and the off-site provision would not undermine the mixed use character of individual streets, localities or areas within the Core Central Activities Zone or add to an existing concentration of social housing.
- iii. Where on- or off-site provision of residential accommodation is not feasible, a financial contribution to the Affordable Housing Fund will be required and, where the council considers it to be appropriate, the provision of a social and community use, cultural use, and/or affordable small business units may also be required.

1. What positive aspects does the above option have?
2. What negative aspects does it have?
3. Is there an alternative that you would prefer?

Implementation vehicles for off-site provision

4. Do you agree in principle that land use credits are a good idea? What are the advantages and disadvantages?

A proposal for a land use credit will only be acceptable to the council if it delivers an equivalent or better planning outcome. Therefore, the credit site would always be a site formerly in commercial use; (as existing residential sites

and redundant social and community uses are likely to be developed for residential use anyway and so no additional housing is achieved). In addition, the cost of the credit housing to the developer should not be taken into account when assessing the viability of a new commercial scheme.

5. What other parameters should govern a system of land use credits? For example:

- should the credit site always be in the vicinity of the commercial site?
- If beyond should the credit site be permitted to be located outside Core CAZ; or even beyond the CAZ?
- Within what time period should the credits be used up?
 - i) 3 years,
 - ii) 5 years,
 - iii) 8 years, or
 - iv) 10 years?
- Should other developers, if it is agreed that on-site residential is not practical or appropriate, be allowed to purchase credits from the credit site to fulfil their own obligations, if this is agreeable to the landowner/ developer of the credit site?

6. Do you agree that the conditions for the use of land use swaps should remain as set out in UDP policy COM 3?

7. Are there any circumstances where roofed plant areas should be excluded from the calculation of gross floorspace? Are there any other parts of a development that you think should be excluded from the calculation?

8. Are there any issues that have not been covered in this part of the workshop that you would like to raise?

9. Are there any issues on this topic that the council should be aware of in its lobbying process?

25 mins

BREAK – 10 mins