

# FITZROVIA WEST NEIGHBOURHOOD FORUM

Neighbourhood Plan 2020-2035

## CONSULTATION STATEMENT

May 2020

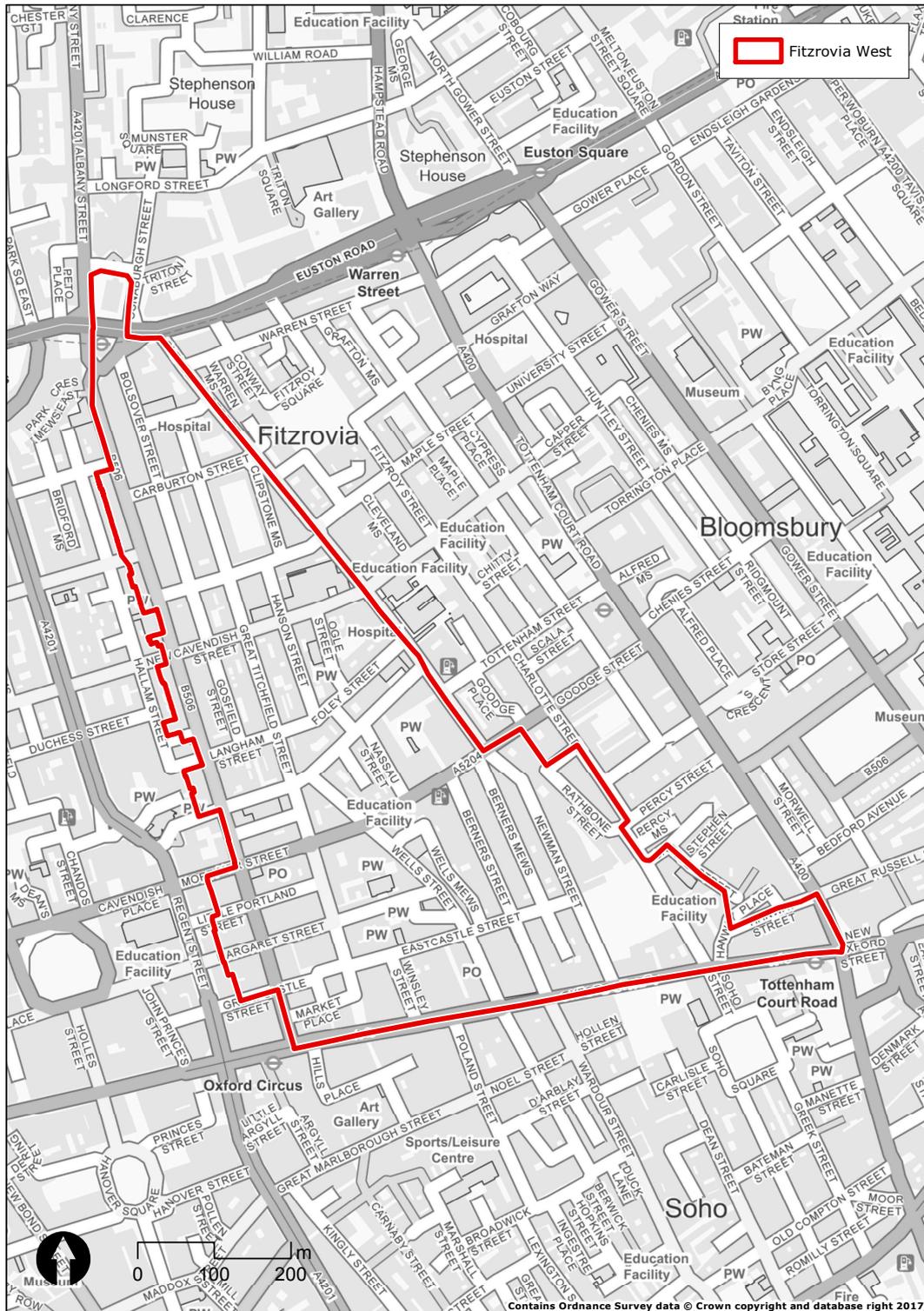
Regulation 16 Submission



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## 1 INTRODUCTION

1.1 This Consultation Statement sets out the steps taken to consult both residents and local businesses at all stages of preparing the draft Neighbourhood Plan (hence forward referred to as ‘the Plan’). It has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012, Section 15(2). Part 5 of the Regulations sets out the purpose of the Consultation Statement. It should:

1. contain details of the persons, businesses and bodies who were consulted about the proposed neighbourhood development plan;
2. explain how they were consulted;
3. summarise the main issues and concerns raised by the persons consulted;
4. describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

## 2 BACKGROUND

2.1 The proposal to set up the Fitzrovia West Neighbourhood Forum developed over a number of years based on public consultation and meetings with Westminster City Council (WCC).

2.2 An application was made and WCC formally approved the designated area for the Forum on 28 March 2014. On 5 February 2015 the Forum was confirmed as the Qualifying Body for the designated area with a written constitution for a business neighbourhood. This means that the neighbourhood plan will need to be approved by referenda of both the residential and business communities.

2.3 The Forum has a total membership of at least 200 businesses, residents and some who live and work from home and holds regular meetings and consultations based on its website.

2.4 The Executive Committee is made up of 12 people with at least five being people working for businesses based at home or in the area. The New West End Company (NVEC) is represented and covers the southern part of the designated area.

2.5 This Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act, 1990, the Planning & Compulsory Purchase Act, 2004, the Localism Act, 2011, the Neighbourhood Planning Regulations, 2015 (as amended) and the Neighbourhood Planning Act, 2017.

2.6 The Forum has prepared the Plan to establish a vision for the future of the area and to set out how that vision will be realised through effective planning, place-making and collaborative working over the plan period of 2020 to 2035.

### 3 **OUR VISION**

- 3.1 The Vision of the Neighbourhood Plan is to ensure that Fitzrovia West develops as a habitable, sustainable and neighbourly community in which to live and work through all means available including planning, collaborative working and community enterprise (p.13 of the draft Plan).

There are five core sets of objectives set out in the Plan: Promoting Regeneration; Supporting Business Uses and Development; Protecting and Increase Green and Open Space; Promoting Environmental Quality; and Mobility and Transport (p.13-14 of the draft Plan).

### 4 **OUR CONSULTATION STRATEGY**

- 4.1 Since designation, the Neighbourhood Forum set out to engage and consult both residents and businesses as fully as possible in drawing up the neighbourhood plan. Our strategy has been to use as wide a variety of media as possible, both to publicise our activities and to seek comments and suggestions. In order to keep members informed, we have organised at least one public meeting a year since 2014, most with supporting exhibition and publicity material, and with leaflet-drops in advance of the meetings.
- 4.2 Key stages in the consultation have been publicised through the local community newspaper, *Fitzrovia News* [ <https://news.fitzrovia.org.uk/>], and on several occasions this has stimulated articles in *Westminster Extra*, a free newspaper distributed widely across the City of Westminster (see Appendix 2).
- 4.3 In addition, we regularly send emails, blogs and other forms of social media to members, friends and contacts. Our website contains all relevant documentation and also provides a page to enable comments or questions to be submitted anytime. Dates and minutes are published on the website<sup>1</sup>. The New West End Company (NEWC), which covers the southern part of the Forum area, assists with marketing and publicity advice and the use of their distribution systems. Although this is a dense, highly developed area with about 4000 residents and over 2000 businesses, we feel we have done as much as possible within our resource constraints to publicise the existence of the Forum and to consult on the priorities for the draft Plan.
- 4.4 All consultation stages have been carried out by local people working on a voluntary basis and without the assistance of consultants.

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<sup>1</sup> See the Forum website at [www.fitzwest.org](http://www.fitzwest.org) for all documents, exhibition material and minutes of meetings

## DESIGNATION OF THE NEIGHBOURHOOD FORUM

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- 5.1 Between January 2013 and February 2015 a number of residents and local businesses met regularly in order to discuss the potential of setting up a neighbourhood forum and preparing a neighbourhood plan. Detailed discussion took place with interested parties, elected members and officers of the City Council. As soon as the area was designated and the constitution had been approved, work began on preparing a draft neighbourhood plan. An outline of key public events is set out in the following paragraphs.
- 5.2 **January 2013 to September 2013:** Early discussions were held before applications were sent in, with as many local organisations as possible, including the Fitzrovia Neighbourhood Association and other tenants and residents' groups. In addition, informal discussions were held with local businesses. These discussions revealed great interest in the formation of a neighbourhood forum.
- 5.3 **September 2013:** After several meetings a steering group of 12 was formed and attention focused on submitting a proposal for designation to the City Council. The steering group decided to follow a comprehensive consultation strategy, drawing on the techniques recommended by the City Council in its *Statement of Community Involvement* and guidance from Locality. The challenge was particularly great because of the high density and congested nature of the built environment and the numbers of both residents and businesses in the area.
- 5.4 A public meeting was arranged on **13 November 2013** to discuss the potential for setting up a neighbourhood forum. This included a presentation by Griff Rhys Jones, president of Civic Voice, on the importance of supporting local communities through neighbourhood planning. The meeting was attended by approximately 30 people<sup>2</sup> who expressed strong support for the idea of a forum.
- 5.5 By **December 2013** the steering group had achieved the following:
1. Set up a website that received over 650 unique hits in its first month of operation;
  2. Attracted over 150 subscribers to sign up as members;
  3. Regularly updated the website with information;
  4. Undertaken a small survey of residents and businesses;
  5. Contacted as many residents and local businesses as possible via a whole area leaflet drop, and individual approaches;
  6. Placed advertisement posters in local shops, cafes, business and residential block noticeboards;
  7. Continued discussions and negotiations with neighbouring groups and amenity societies;

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<sup>2</sup> As publicised in the *Fitzrovia News* on 13 November 2013:  
<https://news.fitzrovia.org.uk/2013/11/13/griff-rhys-jones-to-talk-about-neighbourhood-planning-and-dylan-thomas-in-fitzrovia/>

8. Held two public meetings;
  9. Included articles and information in the local community newspaper and with internet news providers.
- 5.6 In the autumn of 2013 a survey of residents and businesses was carried out to establish a baseline of views and opinions about the area. This proved useful in systematically collecting local opinion and identifying priorities for the Plan<sup>3</sup>.
- 5.7 An application was submitted and on **28 March 2014** Westminster City Council formally approved the designated area for the Forum as submitted (see Figure 1) .
- 5.8 Following Westminster’s approval of the area the steering group focused on:
1. Increasing the range of interests represented by enlarging the steering group;
  2. Finalising the details of the constitution and posting them on the website;
  3. Contacting the membership to update them and update their membership details;
  4. Arranging for the election of a shadow Executive Committee to take over from the steering group for the period of consultation and Westminster’s consideration of the Forum application;
  5. Through the support of one of our business members, we circulated every address in the area with an invitation to our next meeting and to stand for election.
- 5.9 A second public meeting was held at the University of Westminster on **15 July 2014** at which a shadow executive committee was elected. This was chaired by Matthew Bennett from the Soho Society and discussed the broad objectives which would make Fitzrovia ‘a liveable neighbourhood’<sup>4</sup>.
- 5.10 On **5 February 2015** the Forum was confirmed as the Qualifying Body for the designated area with a written constitution for a business neighbourhood. This means the neighbourhood plan will need to be approved by referenda of both the residential and business communities.
- 5.11 The inaugural meeting of the Forum took place at the University of Westminster on **14 April 2015**<sup>5</sup> (see Appendix 4 for the flyer distributed before the meeting).

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<sup>3</sup> The full briefing note and analysis of the survey is available at <https://www.fitzwest.org/archive/full-consultation-report/online-questionnaire/>

<sup>4</sup> The agenda and slides for this meeting can be viewed at <https://www.fitzwest.org/wp-content/uploads/2014/07/150414-Minutes-Inaugural-Meeting-SLIDE-SHOW.pdf>

<sup>5</sup> The minutes of the meeting can be viewed at <https://www.fitzwest.org/wp-content/uploads/2014/07/140414-Minutes-Inaugural-Meeting.pdf>

The membership of the Executive Committee was elected and topics for discussion at the meeting included:

- Pressure for development
- The importance of independent businesses
- Traffic, parking, deliveries, cycling and walking
- Greening the area
- Culture and leisure
- The affordability of housing
- The state of streets and square
- Refuse collection
- Night time uses

5.12 By January 2020 the Forum had a total membership of at least 200 businesses, residents as well as some who both live and work from their home address. It holds regular meetings and consultations based on its website and public meetings. The Executive Committee is made up of 12 members, elected annually, with at least five being people working for businesses based at home or in the area. The University of Westminster has a major presence in the area and is represented on the executive committee as is the New West End Company (NWECC), which represents businesses in the southern part of the forum area.

## 6.0 THE CONSULTATION PROCESS

6.1 Residents live in all parts of the area and represent a diverse range of ethnic and social-economic groups. Businesses and employees include landowners, property developers, (For example, Great Portland Estates, Exemplar, Langham Estates and the Howard de Walden Estate), estate agents, as well as a wide selection of our local small businesses like pubs, cafes, galleries and hairdressers. There is no single, dominant landowner in the area.

6.2 Many of our resident members also run small businesses and represent an important part of Fitzrovia's vibrant creative economic community. Our membership includes writers, architects, musicians, artists and designers. A database of the membership is maintained and regularly updated.

6.3 The New West End Company (NWECC) has been represented on our executive committee from the launch of the forum. It is a business partnership of about 600 UK and international retailers, restaurateurs, hoteliers and property owners and covers Oxford Street, Regent Street and Bond Street and their hinterland. The southern part of the designated area, including the north side of Oxford Street from Great Portland Street to Tottenham Court Road, lies in the Forum's designated area. The Forum has worked closely with NWECC on environmental issues such as the Oxford Street Project and air quality. It has been very supportive including funding printing consultation materials and assisting with distribution.

6.4 Community organizations based in the designated area include; Holcroft Court Residents Association, the Fitzrovia Centre, All Souls Primary School, All Souls

Clubhouse and Youth Project and Fitzrovia Mums. Our ward councillors, from both Marylebone High Street and West End wards are also ex-officio members of the forum, attend meetings when available, and are kept informed of developments. In addition, we have a regular mailing list for our blog.

## 7 CONSULTATION EVENTS AND OUTCOMES

7.1 The main public consultation events are set out below and the main recommendations, outcomes and priorities are described in the following section.

7.2 On **13 November 2013** the first public meeting, attended by about 45 people, was held at the University of Westminster building in New Cavendish Street. This was to inform residents of the intention of setting up a forum and to have a series of discussions and briefings on topics such as housing, open space, traffic, and environmental quality. A representative from the Soho Neighbourhood Forum was invited to facilitate the meeting.

7.3 On **13 December 2013** an application was submitted to WCC to approve the boundaries of the neighbourhood area. In the same month the steering group carried out a membership drive in which a letter and leaflet was distributed to every address, business and residential home in the FitzWest area.

7.4 WCC approved the area designation on **3 April 2014** and soon after an application was made to confirm the forum's constitution. A second public meeting was held on **15 July 2014** at which the shadow executive committee of the forum was elected. This was attended by about 45 resident and business members. A series of presentations were made on the following topics:

- Pressure for development in the area, including Crossrail/the Elizabeth Line;
- Environmental issues;
- The local economy;
- The local environment;
- Licensing and the night-time economy;
- Traffic and transport;
- Residential issues and housing.

7.5 Residents were generally concerned about the lack of affordable housing; increasing pressures for development and added congestion arising from Crossrail; poor air quality; noise nuisance particularly from pubs and restaurants late at night; the lack of open and green space; and some car owners raised issues of the availability and cost of on-street parking. Some small businesses (e.g. shops) raised the difficulties of organising collections and deliveries of goods. The following were the main suggestions from members:

### **1.Promoting regeneration**

Reducing disruption of building works

Infrastructure (bus, rail, phone boxes)  
Cost of housing and super-prime residences – problem of buy to leave  
More local involvement  
Forum involvement in local planning applications  
All the implications of development – parking, bins, greening, pavements

## **2.Supporting business use and development**

Balance between interests of residents and businesses  
Resist residential conversion to protect small businesses  
Nature of local business matters  
Trees/food/independent business (local not national)/public space/street life  
Change of use could be more flexible although may result in the loss of small shops in the area

## **3.Protecting and increasing green and open space**

Encourage and preserve roof gardens  
More trees and of a suitable species  
Living walls  
Encourage local businesses to have window boxes and planters  
Grassing over little used streets

## **4.Promoting environmental quality**

Light pollution  
Noise pollution: From air-conditioning, restaurants, alarms, and music venues  
Air pollution: engine idling, buses, diesel lorries  
Deliveries/waste: Rubbish on streets and collection problems

## **5.Mobility and transport**

Dangers of cycles on pavements, cycle lanes/mixed use roads  
Fewer pavement obstructions  
Fewer residential parking suspensions  
HGVs – enforcement of laws on parking, pavement use  
Wheelchair access on pavements – meet Camden standards on dropped kerbs  
i.e. everywhere  
Close some small streets  
Amount of parking space in new developments  
Evening and weekend parking

- 7.6 In **January 2015** a revised constitution was submitted to WCC and the forum was confirmed as a business neighbourhood on **5 February**. Publicity was organised to spread the word to businesses and residents by forging closer links with *Fitzrovia News* and by submitting articles on a regular basis, creating a twitter handle *@FitzWestForum* and tweeting regularly.

- 7.7 The inaugural meeting of the Forum took place on **14 April 2015** and was attended by 65 residents and business representatives. The shadow executive stood down and a new executive committee was elected<sup>6</sup>.
- 7.8 The 2016 AGM took place on **11 January 2016**. An exhibition of display boards<sup>7</sup> was organised to illustrate policy options and to encourage a debate amongst members. We were fortunate in being loaned a ground floor space owned by Getty Galleries in Eastcastle Street for this event. Approximately 50 people attended and left written comments after viewing the display boards. In 2017 comments were invited on an initial draft of the Plan.
- 7.9 The two most recent AGMs were held on **25 June 2018** and **13 May 2019**. At the first of these the following topics were selected for discussion: The impact of WCC's plans for Oxford Street (at the time out for public consultation); greening the area; walking, cycling and public transport<sup>8</sup>. In addition, the Forum's constitution was formally approved by the meeting<sup>9</sup>.
- 7.10 A number of drafts of the Plan were placed on the website and formed the focus for continuing consultation and feedback. In February 2019 in the period before the AGM in May articles were placed in the local paper, *Westminster Extra* (see Appendix 2) and the *Neighbourhood News* (see Appendix 3).
- 7.11 At the **2019 AGM** presentations were made on the draft neighbourhood plan and on the Council's air quality strategy with an extended discussion afterwards about both issues. A series of eight boards were on display from 2.30 in the afternoon of the meeting. These related to the main chapter headings of the Plan as well as including a single panel on indicative proposals for landscaping Market Place prepared by Ove Arup. All residents and businesses in the area were invited by both a blog (see Appendix 5) and a hand-delivered invitation (see Appendix 6) and 44 people attended<sup>10</sup>. Presentations were made by Nick Bailey (Forum executive committee member) on the Draft Neighbourhood Plan and Adam Webber (Air Quality Officer for the City Council), on the Council's air quality strategy. Copies of the draft Plan were available at the meeting for inspection.
- 7.12 All members of the Forum were invited to fill out the survey either online or at the meeting. An article in the *Fitzrovia News* and on the Forum's website notified all

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<sup>6</sup> The minutes of the 2015 meeting are available at: <https://www.fitzwest.org/wp-content/uploads/2014/07/140414-Minutes-Inaugural-Meeting.pdf>

<sup>7</sup> The display boards can be viewed at <https://www.fitzwest.org/exhibition2016/>

<sup>8</sup> The minutes of the 2018 AGM can be viewed at [https://www.fitzwest.org/wp-content/uploads/2014/07/FitzWest\\_AGM\\_minutes\\_0618-final.pdf](https://www.fitzwest.org/wp-content/uploads/2014/07/FitzWest_AGM_minutes_0618-final.pdf)

<sup>9</sup> The approved constitution can be seen at <https://www.fitzwest.org/aboutus/constitution/>

<sup>10</sup> The minutes of the 2019 AGM can be viewed at <https://www.fitzwest.org/wp-content/uploads/2019/05/Minutes-AGM-13.5.19-final.pdf>

businesses and residents of the event. Eight display boards were prepared to explain the main policy objectives of the Plan<sup>11</sup>.

**TABLE 1**  
**Survey Results of Residents and Businesses on the Draft FitzWest Neighbourhood Plan**  
**May 2019**

All residents and businesses in the FitzWest area were given the opportunity to fill out a survey about their thoughts and contributions to the Draft Neighbourhood Plan. This was available online and also via hard copies at the exhibition on 13th May 2019.

There were 26 responses in total. These are set out below under each question.

*1. Do you support the preservation of mixed use in the area – residential, small and large businesses, arts venues and community facilities?*

Yes: 24 No: 0 Don't know: 0 No reply: 2

**Are there any particular aspects of preservation of mixed use in the plan that that you support or object to? [policies PR1, PR3 and PR4]**

- I feel it would be crucial to maintain a significant residential proportion and to grow a community where residents live happily & harmoniously
- I support the provision of social housing mixed developments
- Impact on residents is key. Music venues and pubs are serious sources of noise pollution. Mixed use policy is likely to impact if there is no control over rents. *Airbnb* and student residents need to be controlled.
- Arts venues
- I object to freeholders using this as a way to force the council to allow them to build in areas very close to properties i.e. a very small courtyard behind 88-94 Great Titchfield Street. Two applications have been turned down. They are now appealing!
- Not big business it supresses small ones.
- No to large businesses. No to developers building higher and extending buildings and blocking light to local residential properties. The streets also lack sunlight due to higher buildings.
- Affordable housing priority for many.
- Different sizes of units. Larger residential units and a variety of small business units, plus cultural and educational uses.
- I think the use of residential property as *Airbnb* should be prohibited as it means fewer residential units.
- We wish to see the provision of more residential and both large and small business space.
- important to maintain and expand the mix of housing tenures and sizes, and mix of small businesses, shops and cafes/restaurants.

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<sup>11</sup> All 8 display boards can be viewed at <https://www.fitzwest.org/wp-content/uploads/2019/05/FitzWest-Boards-for-2019-Exhibition-8-pages.pdf>

- I like the mix of food & cafe and retail.

## 2. Do you support the increase in the amount of affordable housing?

Yes: 20 No: 1 Don't know: 2 No reply: 3

### Are there any particular aspects of affordable housing in the plan that that you support or object to? [policy PR2]

- Current 20% is good
- Developers should not be allowed to buy their way out of including social housing in new developments
- I'm not sure if this is the correct place to register this but hopefully if not, it will be recorded elsewhere – when considering the height of buildings nearby when considering additional storeys, for Cleveland St and other streets that are on the border could the other side of the street i.e. Camden be taken into account. This is particularly relevant at the north end of Cleveland St (conservation area) where a new block is being built which I believe will be much higher than the buildings to its north or the Camden side or indeed Holcroft Court.
- I must be (live) in the area.
- Pt 5.23: principle residence. In the St Ives case, a requirement to be registered with a GP or to have a child registered at school is all that is required. There is no reference to employment. I know many people studying, at age 30+ who are full time unemployed, post doc fellows etc. at UCL.
- Protect residents' rights. I object to freeholders using this as a way to force the council to allow them to build in areas very close to properties i.e. a very small courtyard behind 88-94 Great Titchfield Street. Two applications have been turned down. They are now appealing!
- Should be provided in Fitzrovia/Westminster
- The cost of living in the area for people in affordable housing.
- Family housing with attached green space and play space. Sheltered housing for the elderly and differently abled.
- I think that Right to Buy legislation needs to be repealed before the affordable housing is increased. Once the legislation is repealed, I am in favour of an increase in affordable housing.
- We believe the provision of affordable housing should be flexibly achieved so that, for example, a limited number of affordable units in a smaller property is not achievable.
- support for high quality, well designed, sustainable housing of a mix of sizes and with access to outdoor and open space.
- The more affordable housing the richer the environment.

## 3. Do you support the protection and increase of green and open space?

Yes: 24 No: 0 Don't know: 0 No reply: 2

### Are there any particular aspects of green/open space in the plan that that you support or object to? (policies GS1, GS2)

- Definitely, we need green spaces, small parks and areas where kids can play, residents aggregate and meet and to strengthen the village character if we can
- I really like the suggested closure and greening of streets such as Foley Street. Looks a like a no brainer to me!
- But it should be done with safety in mind.

- More vegetation is a must.
- Market Place looks an ideal area for a green space. As does east of Riding House Street and Great Titchfield Street/Foley Street. I haven't examined the re-routing of traffic, or effect on parking spaces for residents.
- The development of Market Place.
- More traditional design, if possible so new designs don't have to be replaced every ten years.
- Take cars out – put planting in.
- Most of the space presently devoted to parking needs to be transformed into green space as we are severely lacking in green space.
- The amount of green and open space should be increased. Streetscape improvements should be introduced that:

(i) increase the width of pavements and make space for planting;

(ii) reduce what were originally two lane streets that are now one-way to single lanes;

(iii) close streets where tertiary in nature in order to create open space and greenery and provide play space for children and community space for residents and businesses.

- Important to create more open space through better street management and closure of sections of streets to create play and sitting areas with reduced pollution.
- We are desperate for any Green space, the more the better.

#### *4. Do you support the principle of landscaping some of the streets and reducing or removing traffic?*

Yes: 24 No: 0 Don't know: 0 No reply: 2

#### **Are there any particular aspects of landscaping and traffic reduction in the plan that that you support or object to? [policies T1 and T2]**

- As long as we still have easy access to public transport. BUT Important to make sure buses don't start invading our streets if Oxford St is pedestrianised
- I support the reduction of through traffic in our area. There are too many large lorries/trucks/vans driving at high speed down my street which is very narrow (Hanson Street)
- But access must be preserved for services to residents.
- Residents parking and access – proper maintenance of planted areas. They could become rubbish areas.
- No point if rubbish everywhere.
- Need to monitor traffic flow and traffic jams in Fitzrovia.
- Residents who are elderly depend on being able to park a car.
- Landscaping yes. I have a business that relies on transport.
- Trees in Great Titchfield Street all parts of GTS.
- Very strongly support.
- There is insufficient traffic reduction and there are too many parked cars where there should be green space. Most of the parked cars need to be removed and replaced with planting.
- Any scheme (e.g. as set out in our Green Strategy) which creates improved outdoor environments for all age groups, for residents as well as those working in the area and visitors.
- Reduce traffic speeds, raised curb + street to slow traffic, more trees on street.

#### *5. Do you support protecting and increasing provision for small businesses?*

Yes: 23 No: 0 Don't know: 1 No reply: 2

**Are there any particular aspects of protecting and increasing provision for small businesses in the plan that that you support or object to? [policies B1 and B2]**

- 100%. I feel completely disheartened to see many of the small businesses close down and being replaced by sterile character-less chains. We need to work with council to keep commercial rents reasonable to encourage innovation, entrepreneurship and grow small businesses
- I support less food outlets.
- I support the proposal to encourage new small businesses and retail shops. It is this type of business that gives Fitzrovia its special character.
- But they need to respect other people in the area, especially residents.
- Not to change residential into business. An increase in small business means more premises are required – many houses are residents only – I wouldn't want this to change.
- There should be more variety in small businesses – any clusters almost always in hairdressers/barbers or cafes.
- Newman Street is a narrow street with heavy south-north traffic. Parallel streets Wells Street, Berners Street and Great Titchfield Street are much wider and are very quiet streets with little north-south traffic (particularly Berners Street.)
- No nightclubs, or really late-night drinking.
- Business rents/rates not sustainable.
- Bin collections.
- This should be enshrined in planning applications and part of land deals with WCC.
- Empty shops and office should be brought into use for pop up shops and start-up businesses.
- We believe small business space is an essential part of Fitzrovia and should be increased. We also believe larger offices should also be provided.
- Important to protect existing accommodation for small businesses and to ensure that more is provided – tendency towards large floor plates designed to accommodate large multi-nationals.

**6. Do you support improving environmental standards and air quality?**

Yes: 24 No: 0 Don't know: 0 No reply: 2

**6. Are there any particular aspects of improving environmental standards and air quality in the plan that that you support or object to? [policies EN1 and EN2]**

- I'm all for cleaner air
- I am extremely concerned about air pollution in Fitzrovia and I support para 11 To be an exemplar in sustainable city living by applying the highest environmental standards, particularly on energy conservation and reducing the emission of greenhouse gases and particulates.
- This is essential. We live in a [porous soup]
- Tell the world not to idle! TURN OFF Tell cabbies – tell delivery cans/companies.
- New development should NOT provide car parking. Car parking on the streets should be more residential generally.
- Building companies using plants. Environmentally friendly materials.
- I'd put this top of the list. Its about air conditioning, gas central heating as well as vehicle emissions.

- There needs to be more restriction of through traffic. Air conditioning units should be banned as the noise and hot air negatively impact on neighbours. Outside heaters attached to buildings should be prohibited as they encourage loud noise outside bars etc. at night and increase the heat load in the neighbourhood in summer.
- Fitzrovia has appalling air quality and drastic and urgent action should be applied to reduce vehicle access; ban all diesel vehicles and provide increased electric charge points.
- Improve traffic management and bus routes, create distribution hubs for goods and other deliveries using electric vehicles. Create more electric charge points
- This is really important.

*7. Do you support the improvement of mobility and transport with an emphasis on reducing through traffic while allowing businesses and residents to gain access?*

Yes: 22 No: 0 Don't know: 2 No reply: 2

**Are there any particular aspects of improving mobility and transport in the plan that that you support or object to? [policies T1 and T2]**

- In line with answer above
- I think there should be some provision (perhaps dial a ride) for older residents to get to the shops and or transport hubs – I am aware some older residents find it difficult to get to the shops.
- Also access for services to residents needs to be protected.
- Should ban all non-electric vehicles except for disabled/elderly.
- Lots of electric charging points for electric vehicles. We need an electric shuttle bus for elderly residents or you will have a lot of electric scooters.
- Where will the traffic go?
- Traffic calming please. I don't mind walking a bit and getting there a minute or two more slowly.
- Buses should be restricted to Red Routes such as Oxford Street, Portland Place, Langham Place and Tottenham Court Road and the Marylebone Road. Buses should not be permitted in smaller streets. The smaller streets should be filtered and used for access for residents and businesses in the area. Through traffic of lorries, private cars, Uber drivers and taxis should be disabled. It should be as safe to walk or cycle through FitzWest as it presently is to drive a car through the area. Children should be able to cycle safely to school in the area.
- Disabled access should be provided to all local underground stations.
- Review and rationalise traffic flows throughout the area and arising from Oxford Street project.

*8. Do you support the plan to rejuvenate and green Market Place? (South end of Great Titchfield Street)*

Yes: 23 No: 0 Don't know: 1 No reply: 2

**Are there any particular aspects of rejuvenating and greening Market Place that that you support or object to? [reference to a display board on Market Place]**

- I love the idea.
- It seems to me that trees are not adequately protected and cared for in inner city streets. They are sometimes not watered enough when they are trying to establish themselves, and it only takes one van driver to knock a tree over as frequently seems to happen behind the Holiday Inn I note one tree has been replaced again but the other has not.

- There is a very obvious route for traffic which should work.
- And I would support greening Langham/Foley Streets
- Needed for the wellbeing of all.
- I think it could be more radical. I don't like the idea of keeping vehicle separation.
- No 'Early wins' to provide public open space and spaces for residents, visitors and businesses alike are essential in providing a neighbourhood devoid of open space.
- More pedestrianisation and less road traffic.

**9. Do you support the Neighbourhood Plan?**

**Yes: 23 No: 1 Don't know: 2**

There was an extended period of questions and answers and discussion about the plan at the end of the meeting.

7.12 On **11 November 2019** an application was made to the Council to extend the designation of the Forum for a further five years. The renewal of designation was confirmed on **20 February 2020** and consultation continued throughout this period.

7.13 After several meetings with interested parties and after the series of annual meetings described above, the vision, objectives and primary policy areas began to crystallise and a series of more detailed drafts for each one were put forward by a small working group and in consultation with our planning consultant, Tony Burton. These elements of the Plan encapsulated our view of the main policy concerns and issues raised by stakeholders throughout the consultation process.

7.14 The draft neighbourhood plan has been sent to WCC officers for informal comments and feedback several times and relevant changes have been made at each iteration and after discussion with forum members and our planning consultant. The Plan has evolved over time and at least 17 drafts have been posted on the website, advertised through a variety of posts and websites and presented at public meetings.

**8 THE REGULATION 14 CONSULTATION**

8.1 The Regulation 14 consultation was carried out between **1 July and 13 August 2019** and all the required statutory agencies, as set out in Schedule 1 of the 2012 Regulations, were invited to comment on the draft Neighbourhood Plan which was located on the FitzWest Forum website (see the letter at Appendix 7). In addition, other relevant stakeholders were invited to comment on the draft plan by email as well as through social media and the website. A total of at least 30 organisations and all members and ward councillors were formally notified of the consultation by email and these included the following categories:

Statutory bodies: Historic England, the Environment Agency, Homes & Communities Agency/Homes England, Power Networks, Network Rail, Highways Agency, Transport for London, the Greater London Authority, Westminster City Council, London Borough of Camden, The NHS Trust, Thames Water and the Coal Authority.

Pressure groups: Westminster Cycling Campaign, Clean Air in London

Local organisations: All Souls' Primary School, All Souls' Clubhouse, The Fitzrovia Centre, the Fitzrovia Trust, the Fitzrovia Neighbourhood Association, Charlotte Street Association, Soho, Marylebone, Knightsbridge and Mayfair Neighbourhood Forums, Holcroft Court Residents Association. Local ward councillors.

Local business organisations: New West End Company, Langham Estates

- 8.2 Many provided general support or did not reply. The detailed responses received are summarised and the changes made to the Plan are set out in Appendix 8.
- 8.3 Most responses were very supportive. For example, the *Greater London Authority* said 'The FitzWest Plan is in general conformity with the current and emerging London Plans and the officer's response below is guidance which should be followed to improve the emerging neighbourhood plan and align it more closely with the draft new London Plan'. The *Westminster Cycling Campaign* said 'We are currently campaigning to create healthy streets in Westminster by introducing low-traffic neighbourhoods. Your proposed policy (T1) is a very useful step towards this goal'. *Historic England* 'welcomes the creation of this Plan and the consideration it gives to heritage and the local character of Fitzrovia'.
- 8.4 The main changes arising from the Regulation 14 consultation involved adding text, incorporating detailed changes to the wording of policies and some editing of the introductions and justifications. In the case of WCC's detailed observations, steps were taken to reduce duplication of higher tier policies and to accentuate how these should be interpreted and applied taking full account of local circumstances. Policy justifications were enhanced to explain the rationale for the Plan and local conditions where appropriate. In addition, policies in the Neighbourhood Plan were checked to ensure they conformed with higher tier strategic policy. Table 2 below provides a summary of the changes made resulting from all stages of the consultation process.
- 8.5 After further drafts were prepared, a Health Check was commissioned from a qualified Examiner in **December 2019**. This suggested minor changes in wording and confirmed all was in order and that policies were in conformity with higher tier plans. The report stated: 'The Pre-Submission Version of the

FWNP is very clear in aligning itself with the relevant Development Plan and not seeking to compromise the implementation of its strategies and policies’.

8.6 Table 2 summarises the key stages of consultation and changes made to successive drafts of the Plan, culminating in the Regulation 14 pre-consultation with interested parties. The full analysis of responses and changes made are set out in Appendix 8.

**Table 2: Summary of Key Changes made to Draft Neighbourhood Plan in response to public consultation.**

Stage/dates	Section(s) of draft Plan reviewed	Key changes made
July 2014 and onwards to 2018	<p>Overall structure and key policy issues affecting the area arising from discussions in the executive committee and a public meeting in July 2014. Further discussions at the inaugural public meeting in April 2015.</p> <p>Extensive period of research, reading policy documents and identifying the evidence base for the Plan.</p> <p>First draft plan submitted to WCC for comments in March 2017. Subsequent revisions built on these and public feedback</p>	<p>Key themes and policy areas were identified to be subject to further consultation and publicity: See 5 key policy areas set out in 7.5 above.</p> <p>Initial feedback confirmed broad approach but recommended review in light of changing strategic policy context and NPPF.</p>
AGM in 2018	The main elements of the Plan were presented verbally and visually at public meetings and through other media, leading up to the Regulation 14 Pre-Consultation. Key issues for debate were: Oxford Street improvements, greening, walking, cycling and public transport. These themes were developed in the Plan.	In 2018 consultants were commissioned to prepare a review of the potential for public realm improvements. 5 case studies of streets were traffic reduction and landscaping might produce real benefits. This was incorporated in policies to enhance green and open space (GS1 and GS2)
AGM in 2019	An exhibition of display boards was arranged, a questionnaire distributed and discussion at the meeting focusing on air quality and the draft Plan. Further refinement of	The public response is set out in Table 1 as well as informal discussion before, during and after the meeting. The questionnaire provided additional evidence. Responses from the public broadly supported the emphasis in the Plan for affordable housing, protection

	policies and wording carried out.	of heritage assets, greening and improved air quality.
July-August 2019	<p>Regulation 14 consultation provided detailed feedback from national and local agencies such as Historic England, the Mayor and GLA and Westminster City Council.</p> <p>Detailed advice and feedback was provided by our planning consultant, Tony Burton.</p> <p>Informal comments and suggestions from executive committee members, ward councillors and local businesses.</p> <p>Continuing responses from members and respondents at the AGM and other events.</p>	<p>Key changes made to the Plan:</p> <ol style="list-style-type: none"> <li>1. Review, edit and amend in light of comments received over several years, particularly to stress how strategic policies should be applied in the light of the local context and priorities identified through consultation, while avoiding repetition;</li> <li>2. Amend as necessary to take into account changes in the revised NPPF (2019), the National Design Guide (2019) and proposed alterations to the London Plan and City Plan;</li> <li>3. Clarify and review what is introductory background, policy and ensure this is fully supported through the justification sections;</li> <li>4. Review and update lists of strategic policies under each policy 'box';</li> <li>5. Amend Objective 4.3(2) to stress importance of heritage assets;</li> <li>6. Add more detail on listed buildings and archaeology in the designated area in the appendix;</li> <li>7. Rename Managing Development as Promoting Regeneration to stress that the Plan is permissive rather than restrictive;</li> <li>8. Amend the policy on tall buildings in light of London Plan and City Plan alterations.</li> <li>9. Clarify policy towards listed and unlisted buildings of merit;</li> <li>10. Clarify policy on affordable housing in line with GLA and WCC strategic policy;</li> <li>11. Clarify that major tourism and night-time uses should be located south of Mortimer Street where the residential population is lowest;</li> <li>12. Clarify policies towards retail uses and to adopt WCC's policy towards CAZ retail clusters (Figure 3);</li> <li>13. Amend policies towards the encouragement of small businesses by contacting local agents and examining growth of companies providing flexible and supported floorspace in the area;</li> <li>14. Review and amend policies on green and open space in light of our consultants' report on provision of 'health streets';</li> </ol>

		<p>15. Review policies towards transport and off-street parking in new developments in zones B and F in line with higher tier policies;</p> <p>16. Strengthen policies towards walking and cycling in response to comments;</p> <p>17. Review and update wording on air quality and environmental objectives;</p> <p>18. Update and review existing plans, photos and diagrams to ensure clarity and level of detail;</p> <p>19. Amend appendix 1 to include full descriptions of buildings listed grade I and II* and local archaeology;</p> <p>20. Review appendix 3 to refine wording on monitoring and reviewing the Plan;</p> <p>21. Review Appendix 4 setting out non-planning-related projects for possible application of CIL funds;</p> <p>22. Review and update key sources in Appendix 5;</p> <p>23. Clarify wording and add to the Glossary;</p> <p>24. To delete the local design guide as suggested by WCC.</p>
December 2019	Appointed an NPIERS Examiner to carry out a health check	Found the draft plan to be in general conformity but suggested minor amendments and additional information on the designation and confirmation that a SEA/HRA appraisal is not required.
March 2020	A consultant was appointed to revise our draft Basic Conditions Statement	Resubmitted in revised form to take account of both existing London Plan and City Plan policies as well as proposed amendments to both.

## 9 CONCLUSIONS

9.1 This Statement sets out to explain the steps taken to comprehensively engage local residents, businesses and other stakeholders using a variety of modes of communication and encapsulated in an iterative process producing a series of draft Plans, which in turn have prompted further comments and feedback.

9.2 Extensive consultation has been comprehensively carried out over a period of seven years and particularly over the last five after the Forum had been recognised as a Qualifying Body. The draft Plan has been frequently revised and updated to take into account comments and feedback, as well as policy changes at London and City Council levels. The challenge has been great because of the diversity of the resident population, the range and variety of businesses and the intensity of development in the designated area.

- 9.3 The final version of the Plan aims to address the main concerns of both residents and businesses, together with all other consultees, in as clear and accessible format as is possible leading to a set of coherent policies. Over the period of consultation, at least 17 drafts of the Neighbourhood Plan have been prepared and publicised on our website and elsewhere. Table 2 summarises the main changes made arising from the Regulation 14 Consultation, the survey and issues raised informally by stakeholders and interested parties. Appendix 7 sets out the comments made by interested parties and the consequent changes to the Plan.
- 9.4 We look forward to progressing this Plan to examination and the referendum with the support of Westminster City Council.

## Appendix 1: Extract from Fitzrovia News Website dated 2 June 2016



# Producing a neighbourhood plan will be a 'Herculean task' says Fitzrovia West group

Posted on 11:44 pm, Thursday, 2 June 2016 by Editors in Environment

A local neighbourhood group is working towards a first draft of a neighbourhood plan for the Fitzrovia West Neighbourhood Area to be published this autumn.



A recent public consultation has identified many priorities for the area. Residents and business people have expressed a desire to reduce pollution, create green spaces, better manage refuse and rubbish, protect and encourage local shops and businesses, preserve local heritage, and press for the delivery of affordable housing in the neighbourhood.

The forum has also resolved that "immediate steps be taken to start a programme of public greening" and to improve the streets for walking and cycling.

Wendy Shillam of [Fitzrovia West Neighbourhood Forum](#) told *Fitzrovia News*:

"Drafting the plan will be a Herculean task and FitzWest welcomes offers of help from other members of the forum, especially if they have specialist knowledge.

"In September this draft will be presented to an AGM for further discussion. As in previous successful meetings there will be a series of discussion groups, so that forum members may speak face to face with those involved in each specific topic."

A summary of the emerging plan has been [published on the FitzWest website](#).

Share this:



## Appendix 2: Extract From Westminster Extra 22 February 2019

6 NEWS Follow us on Twitter @WestminsterXtra

Westminster Extra Friday 22 February 2019

# Neighbourhood scheme includes affordable homes and bid to protect area's quirky character Plan for Fitzrovia's future is unveiled

WITH more than 70 listed buildings and a wonderful patchwork history, Fitzrovia has long been the quirky jewel in the West End, somewhere with a slightly different flavour from the famous neighbourhoods that surround it.

It has always been home to those who come to London from near and far, offering a haven to the Paris Communards, Jewish émigrés, Greeks and Cypriots, Spanish and Italians.

Artists, writers, designers, makers – Fitzrovia is a powerhouse driven by its diversity.

Now a new neighbourhood plan has been set up by the Fitzrovia West Forum.

Established in 2015 under the government's Localism Act, it covers the part of the area that lies in Westminster, with streets to the west of Cleveland Street, south to Oxford Street, and with Marylebone Road to the north falling within the forum's remit.

An executive committee has been formed to draw up the

by DAN CARRIER

draft plan, and Nick Bailey, a retired academic from the University of Westminster, has helped formulate its key aspects.

Mr Bailey's teaching career focused on urban planning and he has lived in the Fitzrovia area for more than 30 years.

He was a founder member of the Fitzrovia Neighbourhood Association in the 1970s.

He has seen Fitzrovia change, and also knows what makes it special.

He said: "It was pretty bad back in the 1970s in terms of housing.

"There was a lot of overcrowding and poor conditions."

This partly stems from its history: while the Bedford estate to the east and the Harley estate to the west were owned by families who worked as high-end landlords, the Fitzroy family, who owned much of the Fitzrovia estate, began winding down their interest in the late 19th century.

It created a vibrant, affordable, home for many different people but



The plan includes proposals to protect independent businesses such as those in Charlotte Place

**"Can we come and stay  
We're no trouble!"**

**WELCOME DOGS LIKE DAISY & TRI INTO  
YOUR HOME FOR A HOLIDAY AND  
RECEIVE A LITTLE EXTRA INCOME**

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also led to poor housing conditions.

Mr Bailey said: "Many realised around the late 1980s and early 1990s it was actually a really attractive place and it took off from there."

A trend to turn housing into offices followed, because of offices commanding higher rents, but this has been reversed since the turn of the millennium as house prices shot up.

Mr Bailey said: "Housing now is a major issue. Most of the new housing is what is called super-prime housing, which costs over £2million."

The neighbourhood plan seeks to make sure new projects include affordable homes on site.

One of the major redevelopment sites of recent years was the former Middlesex hospital, and it reveals issues facing the neighbourhood.

Many of the properties have been left vacant as investors park money in homes they know will not depreciate

in value, while the 17 per cent affordable houses are full, added Mr Bailey.

He said: "Westminster now says there should be up to 35 per cent affordable housing for any development over 10 units, but many developers have been able to get out of this commitment by offering a financial contribution – and that is rarely spent in the West End and Fitzrovia."

A key aspect is to create more open space, which is a tricky task considering the built-up nature of the area, but one the plan

tackles. Mr Bailey said: "There is no public open space in the area, apart from some small places tucked away."

"We have commissioned a report that identifies a number of streets that could be closed off and landscaped, with traffic redirected."

Using funds from the Community Investment Levy – bankrolled by section 106 agreements with developers – money could be found to landscape streets.

The plan also has a section on how to support the area's businesses.

"The area is typified by its number of small businesses," said Mr Bailey.

"This includes shops, cafés, restaurants and offices. We need to support and protect them."

This can be achieved by stopping new developments and refits

of large blocks having large footprint units.

Instead, it will aim to keep the size of units smaller so they continue to attract independent businesses.

Mr Bailey added: "Buildings have often had multi-occupations of companies associated with the arts and the media, but there has also been a trend for bigger firms to move in and take over larger spaces."

"But we have a mixed London community here, which is important to protect."

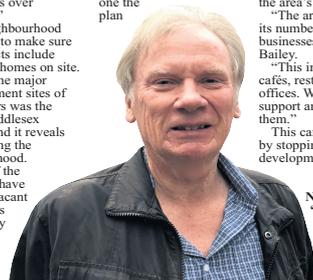
The plan looks at environmental standards, with the area suffering from through-traffic, and they hope to improve roads for pedestrians and cyclists.

The draft will be discussed at the forum's annual meeting in May, after it is looked at by Westminster City Council's planning department.

It will then go back to City Hall and be audited by a planning inspector.

Once completed, it will go to a referendum of residents before becoming part of Westminster Council's planning laws.

Nick Bailey: "We have a mixed London community here, which is important to protect"



## Appendix 3: Extract from Fitzrovia News February 2019

8 — Fitzrovia News issue 152 Spring 2019

# Fitzrovia West Neighbourhood Plan sets priorities for the next 15 Years

By Nick Bailey

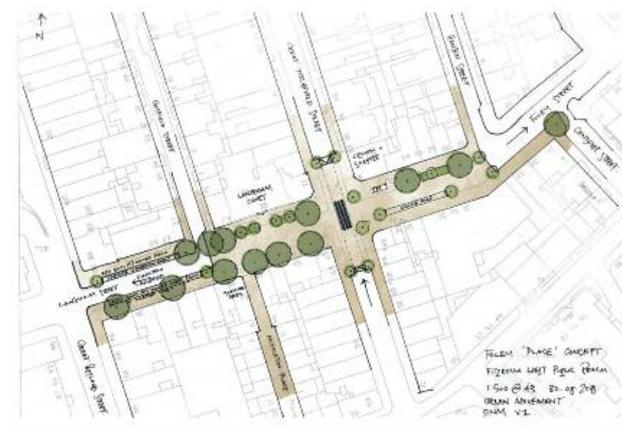
The FitzWest Neighbourhood Forum was set up in 2015 and one of its main functions is to prepare a neighbourhood plan for that part of Fitzrovia lying west of Cleveland Street and Charlotte Street as far south as Oxford Street in the City of Westminster. The Marylebone Road is the northern boundary. The Forum is made up of representatives of local residents, businesses and ward councillors from West End and Marylebone High Street wards.

The plan has to pass through a number of stages before it becomes part of the statutory planning process and is then used as an important guide when the Council decides on planning applications. It also enables us to set out our priorities and inform officers and councillors about what improvements are needed in the future.

FitzWest is an urban village with a mixture of residents and businesses that makes it such an attractive place to live and work. There are also many thousands of workers and visitors travelling to and from the area every day. Because of this mixture, Westminster has decided we are a 'business neighbourhood'. This means that we must pay special attention to the needs of local businesses, as in the final stage the plan has to be approved by a referendum of both residents and businesses.

So what is the plan proposing? We have five main objectives: The first is to preserve the mix of uses in the area and increase the amount of affordable housing.

Large parts of the area lie within Conservation Areas and there are many listed buildings and other attractive or historic buildings that need to be protected and not overshadowed by inappropriate high-rise developments. Where new development is proposed it should respect the scale, quality of design and mix of uses in the area. In line with Council policy, new housing development of 10 or more flats should provide at least 35% of affordable housing which should be built on site and not in another part of the borough. In the past developers have been able to make a payment to avoid this stipulation. Very high quality architecture and an attractive street frontage are essential.



Left: Langham Street and Foley Street public realm improvements. One of several ideas for improving greening, creating public space, and removing the dominance of motor traffic.

**“the plan aims to reduce through traffic while enabling existing businesses to gain access to their premises”**

FitzWest is renowned for its arts, cultural and leisure provision but these should be well managed and considerate to neighbours. We want to restrict large hotels and nightclubs to the area south of Mortimer Street, which has fewer residents. Community facilities, such as the Fitzrovia Centre, All Souls' school, All Souls' Clubhouse and the nursery in Holcroft Court, should be protected and, where possible, increased provision should be provided to meet all needs.

The second is protecting and increasing green and open space: FitzWest has long suffered from a lack of green and open space, including play space for young children. In 2018 the Forum commissioned a study which identified a number of streets which could be closed to traffic and landscaped to provide sitting out areas and play space without the constant danger of passing traffic and pollution.

Riding House Street near All Souls' school, parts of Foley Street and Langham Street are high priorities for this treatment. There are many other streets where traffic could be redirected and the street could be landscaped for sitting areas and play space. Too many streets are narrow but often full of parked cars, making it difficult for pedestrians and dangerous for children and cyclists. We want to see the City Council tak-

ing a lead in implementing these proposals.

The Forum has also promoted a scheme to 'green' the pavement area on the west side of Holcroft Court and wants to see an increased use of green roofs and walls, tree planting and planters for use by residents.

Our third is about supporting small businesses: As part of the Central Activities Zone, FitzWest provides a home for over 2000 businesses employing a total of almost 40,000 people. It has an extremely dynamic economy ranging from the small shop or specialist consultancies, to creative industries and global companies such as Estée Lauder and Facebook.

FitzWest has traditionally housed many craftsmen, shops, galleries, restaurants and specialist companies which depend on easy access to the BBC and other media companies, or department stores in Oxford Street or Tottenham Court Road. We wish to see this mix sustained and in particular, increased provision of appropriate workspaces for small, start-up companies.

One of the particular attractions of FitzWest is the range of shops, cafes and restaurants on streets such as Great Titchfield Street. While shops have been declining in number throughout London, there are other uses which can take their place and en-

sure the streets remain vibrant and provide the range of services those living and working in the area need. This equally applies to Oxford Street where some major retailers are closing or using less floor space.

The fourth objective is protecting and improving environmental standards: FitzWest experiences some of the lowest air quality standards in London and the Forum strongly supports any measures to reduce unnecessary through traffic and to rationalize the buses and deliveries by mainly diesel vehicles.

As well as vehicles going electric, buildings need to be more energy efficient and sustainable through reducing the emission of greenhouse gases. These changes can also play a part in limiting the 'heat island effect' whereby temperatures in central London are significantly higher in the summer than surrounding areas.

The final objective is improving mobility and transport: As already noted, the plan aims to reduce through traffic while enabling existing businesses to gain access to their premises. The emphasis is very much on improving provision for walking and cycling and encouraging greater use of electric vehicles for deliveries and use by residents.

The opening of the Elizabeth Line (Crossrail) will bring increased numbers of pedestrians

onto Oxford Street, as well as increased pressures for expanding and redeveloping property in the area.

Ideally we'd like a full and comprehensive review of traffic flows on both the Westminster and Camden sides of the boundary with a view to a comprehensive plan for traffic calming and improved air quality.

The draft plan, and supporting documentation, is available to view on the FitzWest website and we warmly invite residents, local businesses and visitors to read it and send us their comments and feedback. It also includes an appendix to promote other ideas by which the area might be improved but which cannot be directly influenced by the planning process. The plan and other documents are available here:

<http://fitzwest.org/wordpress/draft-plan/>

**FitzWest Neighbourhood Forum consultation on the Neighbourhood Plan and AGM, Monday 13 May, Sainsbury Wellcome Centre, 25 Howland Street, W1T 4JG.**

13.30 onwards: Consultation on Neighbourhood Plan.

18.00 AGM. Presentation on Neighbourhood Plan followed by guest speaker from the Westminster Council on air quality. Refreshments will be available. We look forward to seeing you.

## Appendix 4: Flyer Distributed before Inaugural Meeting on 14 April 2014

**FitzWest**  
Fitzrovia West Neighbourhood Forum

**INVITATION**



Do you live or work in Fitzrovia West? (ie west of Charlotte/Cleveland Street)  
Do you care about safeguarding our unique environment?  
If you are a local business, resident or organisation you are invited to the:

**FitzWest Inaugural Forum**

Come and celebrate with us!

Tuesday 14th April

Westminster University, Pavilion Room

115 New Cavendish Street, London W1W 6UW

6.30pm - 8.30pm Refreshments

**WHAT IS FITZWEST?**

On 6th February 2015, FitzWest was designated a Neighbourhood Forum by Westminster City Council. Already over 200 local people and businesses have joined. The Forum will make a plan for the neighbourhood, targeting housing, planning, pollution – and much more. Now we need your involvement too!

## Appendix 5: Blog sent to all Members before the Forum AGM on 13 May 2019

Please take a moment to give us your thoughts and comments on the Draft Neighbourhood Plan. Previous feedback has been used and incorporated and all new comments will be recorded and will contribute towards the final plan.

[Click here for the survey](#)

[Click here for the latest version of the Draft Neighbourhood Plan,](#)

**Please come to our Exhibition and AGM on 13 May 2019 at the Sainsbury Wellcome Centre, 25 Howland Street: <https://www.sainsburywellcome.org/web/content/contact-us>.**

### **The Exhibition: Open from 2.30pm (note the new start time)**

We'll be presenting the latest Draft Neighbourhood Plan, some of our local greening projects including developments on Riding House Street and proposals for Market Place and suggestions about how to spend local CIL money (for CIL see the link below).

The Plan will help shape Fitzwest's built environment and urban realm. This is your last chance to influence the draft before it goes out to formal consultation, so please comment if you can.

Members of the Executive will be available to answer questions and you will be able to express your views via a questionnaire. If you can't come please answer the questionnaire (on the website soon). All views expressed will be carefully considered and our responses will be recorded in a consultation document.

### **The AGM: from 6pm**

**6.00pm Welcome.** Report on our recent work and invitation to join (you need to be a member to take part in the AGM – if you know anyone who would like to join please feel free to forward this email and draw their attention to "How to join the Forum" below).

### **6.15pm Latest Draft Neighbourhood Plan**

Summary of key points and procedure going forward. Q&A.

We will be inviting all 6 local ward councillors and relevant Westminster Council officers.

Lucas van der Steen, WCC liaison for Neighbourhood Planning, will be there to answer questions.

**6.30pm Air Quality.** Adam Webber from Westminster City Council on how the council is aiming to improve local air quality. Q&A.

**7.10pm Elections to the Executive.** The Executive manages the day to day activity of Forum under the direction of you, the members. Any member can stand, so feel free to do so. If you send us a brief bio. in advance of the meeting we'll circulate it. Three members of the Executive will be standing down and presenting themselves for re-election: Nick Bailey, Sharon Banoff and Barbara Corr.

**7.20 Presentation of accounts.**

**7.25 AOB and further opportunity for Q&A**

**7.45 Refreshments**

We look forward to seeing you on 13 May.

## Appendix 6: Flyer distributed to all Residents and Businesses before AGM 13 May 2019

*If you live or work in West Fitzrovia ...*

**FitzWest** cordially invites you to an exhibition at  
**The Sainsbury-Wellcome Centre, 25 Howland Street, W1T 4JG**  
on **Monday 13th May 2019 from 2.30pm**

of the latest proposals for our **Neighbourhood Plan**,  
which is nearly complete, and now needs the agreement  
of local residents and businesses to become part of  
Westminster City Council's planning process.  
Please come to give feedback and approval.

Our **AGM** is from **6.00pm** with updates on the Plan  
and your chance to ask questions and make suggestions.  
Do come.

<http://fitzwest.org>  
for more details and to comment

*Refreshments*

## Appendix 7: Regulation 14 Letter to Consultees

# FITZROVIA WEST NEIGHBOURHOOD FORUM

1<sup>st</sup> July

2019

Dear Consultee,

### **FitzWest Neighbourhood Plan – Pre-Submission Consultation (Regulation 14)**

We are writing to invite your views on the Fitzrovia West Neighbourhood Forum's proposals for a neighbourhood development plan and associated documents.

This is a Pre-Submission Consultation in accordance with the requirements of the localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended). The following consultation documents can be found at the link below on the Forum's website:

- Draft Neighbourhood Plan – 2019- 2034

And supporting documents:

- Fitzrovia West Public Realm Improvements – Greening Strategy
- Draft FitzWest Design Guide

<http://fitzwest.org/wordpress/draft-plan/>

Please submit your responses by email to [info@fitzwest.org](mailto:info@fitzwest.org)

Or post to:

██████████  
Secretary  
FitzWest Neighbourhood Forum  
██████████

Please tell us whether you live, work, study or visit in FitzWest and give your email address.

**Responses must be received by 5.00pm on Tuesday 13<sup>th</sup> August 2019**

By submitting a response you consent to your comments being held by Fitzrovia West Neighbourhood Forum and used for the purposes of developing the Fitzrovia West Neighbourhood Plan. You also consent to your name, email address and postcode being recorded by Fitzrovia West Neighbourhood Forum and to the publication of your comments as part of the statutory process of preparing the Neighbourhood Plan (including on the Fitzrovia West Neighbourhood Forum website).

If you do not want your response, including your name and contact details, to be publicly available please say so clearly in writing when you submit your response.

Yours faithfully,

**Nick Bailey**

Nick Bailey  
Secretary  
Fitzrovia West Neighbourhood Forum.

## Appendix 8

### Fitzrovia West Neighbourhood Forum Draft Neighbourhood Plan

#### Comments and Responses to Regulation 14 Consultation in July & August 2019

Also including responses to a questionnaire issued at the AGM in May 2019

No.	From	Method	Comment	Response
1	Resident 1	Questionnaire 13.05.19	Crucial to maintain a significant residential population and to grow a community where residents live happily and harmoniously; current 20% of affordable housing is good; we need green spaces, small parks and areas where kids can play; important to make sure buses don't start invading our streets if Oxford St is pedestrianised; I feel disheartened to see small businesses close to be replaced by sterile, characterless chains. Strong support for greening Market Place. Support for Neighbourhood Plan.	Noted. These issues are addressed in the Neighbourhood Plan and the support of this resident is welcomed.
2	Resident 2	Questionnaire 13.05.19	I support fewer fast food outlets; general support for the Plan.	Noted but fast food outlets are difficult to control through the planning system.
3	Resident 3	Questionnaire 13.05.19	I wish to .....lodge my objection to your organisation. You represent an extremely limited number of residents and you are not an elected body. It is....inappropriate of you to represent the neighbourhood and lobby WCC on this pretence. Your plans and opinions are not welcome in the area. Does not support the Plan.	The FitzWest Forum is properly constituted, approved by Westminster City Council and elections take place annually at the AGM.

4	Resident/business 4	Questionnaire 13.05.19	I support the provision of social housing in mixed developments; developers should not be allowed to buy their way out of including social housing in new developments; I really like the suggested closure and greening of streets such as Foley Street; I support the reduction of through traffic and there are too many lorries driving fast down my street (Hanson Street); I support proposals to encourage new small businesses and retail shops which gives the area its character; I'm extremely concerned about air pollution and support para 11; I think there should be provision (eg dial-a-ride) to help older people get to the shops; trees are often damaged and not watered, eg behind the Holiday Inn Hotel in Great Titchfield St. Supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan which supports all these objectives.  The proposal for a dial-a-ride could be added as a potential project for the future and listed in Appendix 4
5	Resident 5	Questionnaire 13.05.19	Height of buildings important particularly when adjacent to a conservation area. This is particularly relevant at the N end of Cleveland Street where a new block is being built which will be much higher than buildings to its north or on the Camden side of the boundary or Holcroft Court. Otherwise general support for the Plan.	Noted. These issues are addressed in the Neighbourhood Plan in policy PR1. Pressures for tall buildings are growing and it is acknowledged that they can have an adverse on heritage assets.
6	Resident 6	Questionnaire 13.05.19	Impact on residents is key. Music venues and pubs are serious sources of noise pollution. Mixed use policy is likely to impact if there is no control over rents; Airbnb and student lets need to be controlled; strong support	Noted but most of these issues depend on effective implementation and enforcement where appropriate. These issues are addressed in the

			for reducing air pollution, but allowing access for resident, businesses, and services. Supports the Plan.	Neighbourhood Plan in relation to air quality and the environment.
7	Resident 7	Questionnaire 13.05.19	Principal residence: I know in the St Ives case requirement to be registered with a GP or to have a child at a local school is all that is required. There's no reference to employment. I know many people studying, at age 30+ who are unemployed, post doc fellows etc at UCL. Otherwise support for all aspects of the Plan.	To be reviewed in the light of evidence from other areas and appeals. Employment to be added as a criterion for primary residence.
8	Resident 8	Questionnaire 13.05.19	No comment	
9	Resident 9	Questionnaire 13.05.19	Wants to see more arts venues and generally supports provisions of the Plan.	Noted but the area contains and is very close to a wide variety of arts venues. Arts venues which add to the character of the area will be supported.
10	Resident 10	Questionnaire 13.05.19	I object to freeholders forcing the council to allow them to build in areas very close to other properties; I've a very small courtyard behind my house and 2 applications have been turned down and they are now appealing! More vegetation is a must and Market Place looks ideal as do other locations in the Plan; concerned about residents parking and maintenance of planted areas; no change of use from residential to businesses uses; ban idling in streets to reduce pollution. Supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan. Idling can be enforced but is outside planning policy.

11	Resident 11	Questionnaire 13.05.19	No to big businesses if they suppress small ones; maintain open spaces and improve rubbish collection. Supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan in PR1, B1 and B2, and GS1 and GS2. Rubbish collection is not subject to planning powers.
12	Resident 12	Questionnaire 13.05.19	There should be more variety in small businesses. Any clusters always include hairdressers/barbers and cafes. Otherwise support for the Plan.	Noted. These issues are addressed in the Neighbourhood Plan through support for small business units in policies B1 and B2.
13	Resident 13	Questionnaire 13.05.19	Affordable housing should be provided; need to monitor traffic flows and traffic jams; Newman St is narrow but full of south – north traffic whereas Wells, Berners and other streets have much less; new developments should not provide off-street car parking. Car parking on streets should be for residents; need for more electric vehicles. Supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan in policies PR1 and PR2.
14	Resident 14	Questionnaire 13.05.19	Supports the Plan	Noted
15	Resident 15	Questionnaire 13.05.19	Supports the Plan	Noted
16	Resident 16	Questionnaire 13.05.19	Residents who are elderly depend on being able to park a car; no night clubs or late night drinking; more electric charge points and an electric shuttle for the elderly; supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan. WCC is installing more electric charge points and an electric shuttle is beyond the remit of this Plan.
17	Resident 17	Questionnaire 13.05.19	Supports the Plan	Noted

18	Resident 18	Questionnaire 13.05.19	Affordable housing is a priority for many; supports improvements to Market Place; supports more landscaping but needs access for business; 'don't know' about support for the Plan.	Noted. These issues are addressed in the Neighbourhood Plan in PR2
19	Resident 19	Questionnaire 13.05.19	Concerned about cost of living in area for people in affordable housing; more traditional design so new designs don't have to be replaced every 10 years; more tree planting; concerned about refuse collection; supports the Plan.	Cost of living is not a planning issue but is noted sympathetically. Design is considered and tree planting is proposed in our greening strategy and policies GS1 and GS2.
20	Resident/business 20	Questionnaire 13.05.19	Wants to see different sized units and mix of business, cultural and educational uses; family housing with attached green space, sheltered housing for the elderly; replace cars with planting; strongly supports more greening; improving air quality essential including air conditioning and gas central heating; more traffic calming and opportunities for walking; supports the Plan	Noted. These issues are addressed in the Neighbourhood Plan in policies PR1, PR2, GS1, GS2 and T1.
21	Resident/business 21	Questionnaire 13.05.19	Use of residential property for Airbnb should be banned as it means fewer residential units; more affordable housing is needed but Right to Buy should be repealed first; most of space used for parking should be replaced with green landscaping; encourage pop-ups in vacant premises; restrict through traffic and ban air conditioning; restrict buses to read routes; improve management and filtering of traffic on side streets for the whole area; supports the Plan.	This is clearly a problem in the area but banning Airbnb is beyond the scope of the plans as is repealing Right to Buy. Planning permission is required if a flat or house is rented out on a short term basis for more than 90 days/year. Other points are noted and are addressed in the Plan.

22	Resident/business 22	Questionnaire 13.05.19	Wishes to see more residential and large and small business space; flexible provision of affordable housing is needed; the amount of green and open space should be increased. Streetscape improvements should be introduced that (i) increase the width of pavements and make space for planting, (ii) reduce what were originally two lane streets that are now one-way to single lanes, (iii) close tertiary streets to create open space and provide play space for children and community space for businesses and residents; more business space is needed of all sizes; improve air quality – ban diesels and provide more electric charge points; disabled access should be provided to all Underground stations; early wins needed by increasing open space; supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan in PR1, PR2, B1, B2, GS1 and GS2
23	Resident/business 23	Questionnaire 13.05.19	Important to maintain and expand the mix of housing tenures and sizes, and mix of small businesses, shops, cafes and restaurants; support for high quality, well designed, sustainable housing of a mix of sizes and with access to outdoor and open space; create more open/green space through street closures and better traffic management; create distribution hubs for goods delivery using electric vehicles; more charge points needed; review and rationalise traffic flows in wider area in line with Oxford Street project; supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan in BS1 and BS2 and PR2. Creating distribution hubs for goods deliveries is actively supported by the Forum and NEWC as in T2.  Rationalisation of all forms of traffic around Oxford St is actively supported
24	Resident 24	Questionnaire 13.05.19	Supports the Plan	Noted

25	Resident 25	Questionnaire 13.05.19	Likes mix of food, cafes and retail; the more affordable housing the richer the environment; we are desperate for more green space; reduce traffic speeds, more trees; air quality is an important issue; supports the Plan.	Noted. These issues are addressed in the Neighbourhood Plan, particulars GS1 and GS2, and EN1 and EN2
26	Resident/business 26	Questionnaire 13.05.19	Supports the Plan.	Noted
27	Natural England	Email 02.08.19	NE does not have any specific comments on this pre-consultation neighbourhood plan	No response needed
28	Historic England	Email 08.08.19	i. 'Surprise that none of 15 objectives cover character or heritage. Given that heritage was identified during your consultations as one of the special characteristics of the area which need to be preserved and enhanced, and has helpfully been picked up in your detailed draft policies PR1, we would encourage you to amend/add to your objectives to fill this gap'.	Additional objective added: 2. To ensure that development is sympathetic to the local character and history and aims to maintain and enhance a strong sense of place. New development should be fully integrated with existing heritage assets without undue harm and without loss of local distinctiveness.
			ii. 'Review draft heritage policies in light of our guidance on writing policies (HEAN 11, 17-18)'	Heritage policies reviewed in the light of HE's guidance

		iii. 'HE's publication <i>Translating good growth for London's historic environment</i> (2017) highlights former Middlesex Hospital site as an example of good growth which can be celebrated and learnt from. Given the popularity of the public space in Pearson Square, is there more that could be done here through the NP to better reveal the heritage significance of the ...former chapel?'	Considered but no further action possible to reveal the heritage significance of the chapel. The chapel is managed by a trust which promotes its use and significance in the area. Some residents consider Fitzroy Place to be overdevelopment as it became much higher and denser than WCC's original planning brief proposed.
		iv. 'We note Appendix 1 highlights certain listed buildings, and includes an excerpt from the Harley St CA. This entry is incomplete.....suggest using a single form of referencing for locally designated unlisted buildings of merit'.	Only part of the Harley St CA is in our area
		v. 'Consider including archaeological designations' in City of Westminster'.	Add that the NP designated area falls within HE's Archaeological Priority Area 2.5: Great Estates  'An excavation that took place at 35-50 Rathbone Place between November 2014 and March 2015 found the remains of buildings that had been constructed in the late 18th century such as walls, drains, cess pits and wells. Waterlogged environmental remains provided evidence of the increasingly diverse range of imported foods available to wealthier Londoners at this time'. (Historic England, 2017)

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29	Greater London Authority	Email 12.08.19	i. The FitzWest NP is in general conformity with the current and emerging London Plans and the officer's response is guidance which should be followed to improve the emerging plan and to align it more closely with the draft new London Plan'.	Noted and guidance has been considered carefully.
			ii. Updated National Planning Guidance 'makes it clear that an indicative housing requirement figure can be requested by a NP body based on the LA's local housing need as a starting point. If WCC is unable to provide a housing requirement figure, or set out an indicative one, the NF should instead use the <i>Neighbourhood planning toolkit on housing needs assessment</i> for this purpose'.	Noted but NPs not required to contain housing requirement target.
			iii. Welcome list of heritage assets (listed and unlisted). 'This builds on 7.1.2 in the draft London Plan. Conservation areas should be identified clearly and early on as they will act as a constraint to development proposals.'	CA's are on the policy map, Figure 2

			<p>iv. While the intention to manage development is appropriately related to the purpose of neighbourhood planning, the neighbourhood plan seeks to limit refurbishment of ‘unlisted buildings of merit’ which would lead to an increase in floorspace, for example, additional storeys or Mansard roofs. This approach could frustrate the implementation of the presumption in favour of small sites in the areas identified in Policy H2A of the draft new London Plan, and in those circumstances, would not be supported by the Mayor or Westminster’s emerging Local Plan. Instead the forum should.....[see v. below]</p>	<p>Policy PR1 has been reviewed to relax limit on additional storeys particularly in the south of the area.</p>
			<p>v. develop design codes that would allow the presumption to operate within acceptably defined limits, in accordance with draft new London Plan Policy H2A. It is noted that much of the Neighbourhood Area is covered by a number of conservation areas and although these areas are excluded from the presumption in favour of small housing development, paragraph 4.2A.5 of the draft new London Plan (consolidated changes) should be taken into consideration which encourages the exploration of small site opportunities in these areas.</p>	<p>Since much of the area is covered by 5 Conservation Areas, it is considered that the policy PR1 provides both opportunities for expansion and protection of heritage assets. Small housing developments would be welcomed but at present no sites are available although ‘windfalls’ may arise.</p>
			<p>vi. The aim to restrict the scale of development by limiting proposed building heights to those of the prevailing heights in the immediate area could also prevent the effective operation of the presumption in</p>	<p>One of the objectives of the Plan is to protect local distinctiveness by channelling growth to the area north of Oxford Street up to Mortimer Street.</p>

			<p>favour of small housing development and should be avoided. Guidance for the design of tall buildings and the correct approach for the optimisation of development are set out in draft new London Plan Policies D8 and D6 respectively and should be followed. In addition, the neighbourhood plan should value the capacity for growth in the area by understanding that the significant investment in Crossrail will make it one of the most connected places in London and this in turn will unlock the development potential in the neighbourhood area to support London's economy.</p>	
			<p>vii. What constitutes a 'tall building' is defined in Westminster's draft City Plan 2040 as buildings greater than 30m in height, which in turn, reflects the definition set out in Policy D8 of the draft new London Plan and should be referenced and/or reinforced in the neighbourhood plan.</p>	<p>Noted. This is amended in policy PR1 and subsequent justification in the NP.</p>
			<p>viii. Neighbourhood plans can proactively allocate sites for new development for housing, employment and other uses and they can also protect and safeguard land for future uses such as open space. The Mayor would welcome the allocation of sites in the FWNP where they would positively contribute towards meeting housing, employment and other needs identified in the emerging Westminster City Plan 2040.</p>	<p>No vacant sites in NP area</p>

30			ix. Officers welcome the neighbourhood plans recognition that CIL receipts collected from development within the neighbourhood area will be given to the forum for the purposes of delivering the neighbourhood plan. The neighbourhood plan in Appendix 4, sets out in the broadest of terms, its infrastructure priorities. However, it is considered that these priorities could be more detailed and area specific and should be agreed in collaboration with Westminster Council and infrastructure providers such as TfL where necessary.	Appendix 4 is a list of suggestions beyond the remit of the NP. Will be pursued over lifetime of NP so more detail at this stage might be premature. Funding for some will depend on applications for CIL to WCC and use of other WCC powers.
			x. Officers welcome the neighbourhood plan's identification of public realm improvements, as set out in Figure 7 and the promotion of air quality improvements set out in Policy EN1 which underpins one of the Mayor's priorities and accords with Policy SI1 of the draft new London Plan.	Noted
	Transport for London	Email 13.08.19	Given, that the whole of the area of West Fitzrovia has a Public Transport Access Level (PTAL) of 6b, we especially welcome and support Policy PR 1 in this plan that states that all new developments in West Fitzrovia should be car-free in accordance with the draft London Plan. Car-free development in this part of London is required to reduce the impacts of growth and densification on streets, which are fundamental in moving people and goods. This approach reflects the borough's connectivity by public transport and access to local jobs and services, which are among the highest of any part of London, and indeed any city in the world.	Noted and car-free development is strongly supported. WCC has now amended its draft City Plan to be in conformity with London Plan policies.

		<p>ii. However, Policy M1 is inconsistent with Policy MD 2g, which states that ‘off-street car parking should only be provided in accordance with WCC policy.’ The draft Westminster City Plan 2019 – 2040 (Regulation 19) proposes a maximum of 0.4 spaces per unit in zones B and F of the borough, which includes the West Fitzrovia Neighbourhood Plan area. This policy is therefore not consistent with the car-free policy that is previously mentioned in Policy MD 1 of this Plan and is not in line with the draft London Plan standards. If the West Fitzrovia Neighbourhood Plan car parking policy is not amended, the Neighbourhood Plan will not be in conformity with the draft London Plan as stated in our response to the draft Westminster City Plan 2019 – 2040 (Regulation 19).</p>	<p>Our preference is for car-free development but there is some inconsistency between the relevant policy in the draft London Plan and the WCC draft plan. WCC has now changed its policy in the draft City Plan.</p>
		<p>iii. ‘The plan should refer to the Healthy Streets Approach and include the Healthy Streets Wheel diagram as illustrated in Appendix B. We also strongly encourage reference to the Mayor’s Vision Zero approach where policies seek to improve safety and quality of the public realm’.</p>	<p>Diagram of Healthy Streets now included</p>

		iv. Para 3.2 please amend text to read: The opening of the Elizabeth Line <del>expected in 2019 to 2020</del> .....	accepted
		PR1: 'We welcome the part of PR1 that supports car-free development in the NP area. This will make a significant contribution towards sustainable development in the borough, enabling modal shift to walking, cycling and public transport in FitzWest.'	noted
		v. Amend MD2g as in first 2 paras above: 'Our concerns with WCC's parking standards are set out in our response to the draft WCC Plan 2019-2040 consultation. We are currently in discussion with WCC officers to understand how we can work together in order to bring the borough's parking standards in line with the draft LP standards. This policy should therefore be amended to reflect the LP requirement that all housing in the NP should be car-free, except for disabled persons parking. Please amend text to read: Because of high accessibility to public transport, all new housing should be car-free except for disabled persons car parking in line with the draft London Plan.'	noted
		vi. Amend para 6.1 to: The opening of the Elizabeth Line, providing a new station at Tottenham Court Road, a new ticket hall entrance at Dean Street and possibly a new Crossrail 2 station at Tottenham Court Road in the 2030s, will make the area particularly attractive to major office users and catering outlets in, for example, Market Place.'	The impact of the Elizabeth line is noted in the draft NP and it is accepted that it will increase accessibility and therefore development pressures in the area.

			vii. Amend Policy GS2: Add 'Rationalise, <b>remove</b> , and if necessary relocate residents' parking provision.'	accepted
			viii. Amend Policy T1: Development proposals will be supported that provide for increased efficiency and <b>sustainable</b> movement of people and goods in the area'.	accepted
			ix. p.43 amend text: Support recent policy initiatives such as the introduction of the T charge and ULEZ to reduce the number of <b>excessively</b> polluting vehicles in the area.	accepted
			x. Policy T1 Support the concept of a 'super-grid' which ensures that traffic uses the main distributor roads and restricts vehicular access on smaller streets except for essential servicing. 'We support restricting vehicular access on smaller streets and would appreciate clarity on measures that will restrict vehicular access within the plan area. A 'cell' approach which prevents through traffic using quieter residential streets can be employed both to improve the environment for locals but also reduce road danger and help deliver Vision Zero.'	Support noted and welcomed

			<p>xi. Policy T2 It is necessary to ensure freight movements are coordinated and planned for and that activities relating to freight become safer, cleaner and more efficient as London grows, while continuing to support a well functioning city. We are therefore strongly supportive of measures that reduce the number of freight vehicles on the road network, making more efficient use of space through the use of distributor hubs to consolidate deliveries as stated in policy T2 in the plan. However, T2 should also mention other measures such as off-street deliveries and out of hours servicing in order to reduce the impact of freight vehicles in the area. The use of all types of active and sustainable freight, including but not necessarily restricted to walking freight and cycle freight such as cargo cycles should be referenced in this policy. The use of low emission freight vehicles such as electric fleet vehicles, should only be considered after active freight options have been considered. Electric vehicle charge points should also be prioritised for the use of commercial vehicles.'</p>	<p>Noted and accepted but some points questioned. Out of hours deliveries can be a cause of disturbance to residents since noise levels for residents will be higher and impact greater at night and in the early morning.</p> <p>Low emission vehicles are becoming more used but noted that the rationalisation of freight deliveries is also needed. More charge points for all kinds of vehicles are also strongly supported.</p>
			<p>xii. Para 9.5 We welcome supporting text in 9.5 that supports increased cycle provision both on and off street in line with T5 and parking standards in Table 10.2 of the draft LP. Where space on footways is highly constrained (as it is in much of central London) consideration should be given to converting car parking spaces to cycle parking on the carriageway.</p>	<p>Noted. The review of car parking spaces should be considered on a case by case basis.</p>

31	Westminster Cycling Campaign	Email 12.08.19	We generally support the principles enshrined in your plan. We support T1, Pedestrian Movement and Sustainable Transport, in particular we strongly support the concept of a 'super-grid'.....We are currently campaigning to create healthy streets in Westminster by introducing low-traffic neighbourhoods. Your proposal is a very useful step towards that goal.	Noted and the principle of 'Healthy Streets' is promoted and supported throughout the Plan.
	Clean Air in London	Email: 12.08.19	Strongly support policy EN2: Renewable energy	Noted and welcomed
32			Supports aim of EN1 but recommends rewording: All applications should demonstrate and make a positive contribution towards improving ambient air quality and reducing emissions of greenhouse gases and the urban heat island effect. Passive ventilation should be prioritised where it will support these requirements.	Noted and accepted
			Please consider Knightsbridge NP's KBR27, 28 and 29 and wording to encourage active travel and minimise adverse transport impacts.	Will review wording
	Knightsbridge Neighbourhood Forum	Email 12.08.19	Consider the KNF's knowledge note on its NP	agreed
33			Consider using wording in KNP's environmental and sustainability policies.	Will review but not always clear that these can be implemented through planning decisions.
	Westminster City Council	Email: 13.08.19	<b>i. Paras 5.1-5.7</b> The content of these paragraphs provides a helpful summary of development pressure in the area. However, it is unclear what the function of these paragraphs is. They are not part of the justification for	Will review all WCC suggestions and comments, will add local policies to strategic policies and will make changes as suggested to justifications. Our approach is to repeat or paraphrase strategic

34			<p>policy MD1 as this follows after the policy. The text also touches on subjects that are covered by other policies, such as affordable housing and air quality.</p> <p>If the text is used to justify a policy it is suggested that this is included in the justification after the policy. Any general planning context can be included within the planning context in chapter 3.</p> <p>Please add commas to numbers greater than 1,000.</p>	<p>policies in some cases since plan users will not always be familiar with what these say. In addition, reference is made to policies in higher tier plans for those wishing to confirm precise wording and detailed requirements.</p> <p>Commas added</p>
	WCC		<p><b>ii. MD1 Managing development in the plan area</b> Chapter title is confusing as other policies address 'managing development'.</p> <p>As per definition of non-strategic policies in para 28 of NPPF, all policies in the plan are 'development management' policies.</p> <p>The policy also covers several topics that are better covered in other policies of the plan. These include environmental sustainability, the design of the public realm and the provision of open space including play space.</p> <p>It is suggested that policy MD1 focus on design principles, changes its title to reflect this, removes unnecessary elements that duplicate existing policy, and</p>	<p>Title changed to Promoting Regeneration</p> <p>In our view NP policies can go beyond 'development management' policies as with other development plans.</p> <p>Noted but some repetition is desirable in support of general development policies.</p> <p>Will review all WCC suggestions and comments, will add local policies to</p>

		<p>move elements that better fit in other places in the plan to those policies.</p> <p>These changes will be required to make it consistent with national policy, particularly NPPF para 16.</p> <p>It is also encouraged to focus policy more on local design issues. The attached design guide is noted, but it will be stronger to set out in policy what the design features are that are important for the local area.</p>	<p>strategic policies and will make changes as suggested to justifications</p> <p>Redevelopment and Extension of Existing Buildings will be reviewed and updated.</p> <p>PR1 Now replaces MD1. Design issues now addressed in draft plan and design guide deleted.</p>
		<p><b>iii. PR1: Opening para</b></p> <p>The policy opens with the statement that the redevelopment or extension of existing buildings will be supported when they meet design and environmental standards and make a contribution to the public realm. There are multiple other development management considerations.</p> <p>It is not clear what this paragraph is seeking to achieve as design and environmental standards and public realm criteria are set out in more detail in the draft City Plan.</p> <p>It is suggested that this paragraph is either removed or simplified. The wider ambition in this para can be stated in the supporting text.</p>	<p>MD1-5 have been retitled PR 1-4 in the revised text</p> <p>Noted</p> <p>Text to be revised but see point above about making plan comprehensible to all users.</p> <p>Text to be revised and simplified</p>
	WCC	<p><b>iv. PR1 – Listed Buildings</b></p> <p>It is not necessary to cross-reference to WCC policy or other guidance in the policy. It will be satisfactory to say this in the supporting text.</p>	<p>Will review all WCC suggestions and comments, will add local policies to</p>

			The reference to section 2 should be removed as the approach to listed buildings is not in general conformity with draft City Plan 40 or the NPPF approach to heritage.	strategic policies and will make changes as suggested to justifications
			<p><b>v. PR1 – Unlisted Buildings of Merit</b></p> <p>The approach to unlisted buildings of merit (local buildings of merit) is not in general conformity with the draft City Plan or consistent with national policy (NPPF).</p> <p>Draft City Plan policy 40 states that a balanced judgment regarding the scale of any harm or loss of the asset and any benefit of the proposed development will be made (in line with NPPF para 197).</p> <p>The draft plan only considers the refurbishment of unlisted buildings of merit, without giving further consideration to their harm or loss.</p> <p>A balanced judgement will be required for every case and their redevelopment may be accepted under certain circumstances.</p> <p>Draft City Plan policy 41 already sets out requirements to preserve architectural features and give regard to the use of materials. It's unclear what sub-section a adds to this.</p> <p>The approach to additional floorspace under sub c does not contribute to the achievement of sustainable</p>	<p>Review wording and text altered to include the 'balanced judgment' test and question of harm or loss.</p> <p>The test of 'harm' is now included in PR1 (2.a)</p> <p>Noted and wording changed</p> <p>This is added to avoid uncertainty; there is no conflict with WCC's policy.</p> <p>Now clarified in PR1 (2.a)</p>

		<p>development (as set out in the NPPF). Proposals for additional floorspace should be considered based on their potential harm and wider benefits.</p> <p>The requirement for ventilation ducts (not shafts) and air conditioning to not be visible from residential windows is not achievable in new development (sub d). Please clarify why this clause only applies to unlisted buildings of merit.</p> <p>Sub e is repeated under section 3 in sub g. Requirements for environmental sustainability would benefit in policy EN1: Promoting improved environmental sustainability and air quality.</p>	<p>Text altered to remove reference to residential windows but in new development ducts and flues should be integrated in original design.</p> <p>Some duplication is justifiable to avoid unnecessary cross-referencing</p>
WCC		<p><b>vi. PR1: All other Buildings</b></p> <p>This section applies to both proposals within and outside a CA which is not in general conformity with the draft City plan and not consistent with the approach to heritage in NPPF.</p> <p>Draft City Plan policy 40 states that the features that contribute positively to the significance of CAs will be retained and that unlisted buildings that make a positive contribution will be conserved. This is different from stating that a building being replaced has little or no architectural or historic significance and refurbishment is not a viable option. The NPPF approach to heritage assets (as CA's are) is dependent on the level of harm and gives no consideration to viability.</p>	<p>Will review all WCC suggestions and comments, will add local policies to strategic policies and will make changes as suggested to justifications.</p> <p>Will check wording</p>

			<p>Sub b repeats policy principles from City plan policies 39, 40 and 41. It is unclear what local element this adds.</p> <p>Sub c prevents making most efficient use of land (chapter 112 in the NPPF) preventing sustainable development. There will be instances where it will be possible to deliver a well designed scheme that exceeds the prevailing height of the street. This also goes against draft City Plan policy 41 with regards to upward extensions.</p> <p>Sub d consists of a design criterion that is of local importance and is therefore supported.</p> <p>Not necessary to repeat WCC and London Plan policy. Draft City Plan policy 9 already sets out the approach to affordable housing including off-site provision and contributions. Sub e does not add anything to this policy. Housing policy would also fit better in MD2 Housing Provision.</p> <p>Requirements for the provision of open space and play space area already set out in the draft City plan (policy 35). It's unclear what sub f adds to this. Helpful to group open space policies together, suggest GS2, Creating new green and open space.</p> <p>The same applies to sub g as sub 2e: it's unnecessary to repeat policies already covered elsewhere, e.g. EN1.</p>	<p>Added for consistency and clarity</p> <p>The need to accommodate addition growth is accepted but this must be balanced by potential harm to the 70+ listed buildings and 5 Conservation Areas in the designated area. Excessive height can have an adverse impact on its location and views from CA's where scale is an important issue. A recent example is 87-105 Cleveland Street, a WCC-owned site.</p> <p>Noted and welcomed</p> <p>Noted but added for consistency and clarity</p> <p>Included to avoid excessive cross-referencing to other policies</p>
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				Noted but added for consistency and clarity
	WCC		<p><b>vii. PR1: Tall Buildings</b>  The approach to tall buildings largely repeats draft City Plan policy 42 where the approach to tall buildings is set out in more detail. This paragraph also conflicts with sub 3c in the same policy as that does not allow any deviation from the prevailing height of the street.</p> <p>The paragraph should not be in policy but located in the supporting text (if required) as it's not necessary to repeat policies from elsewhere.</p>	<p>Will review all WCC suggestions and comments, will add local policies to strategic policies and will make changes as suggested to justifications.</p> <p>Included to avoid excessive cross-referencing to other policies</p>
			<p><b>viii. PR1 – Car Parking</b>  The paragraph on car parking refers to the council's approach in the draft City Plan and London Plan. This should be removed from the policy and can be located in the supporting text if required.</p>	agreed
			<p><b>ix. Para 5.9</b>  It would be helpful if examples/evidence of development pressure and of developments 'potentially threatening' heritage assets, to help justify the policy.</p> <p>The sentence 'These plan policies.....are achieved' is unnecessary and can be removed as it is a generic statement that seems to apply to all/multiple policies.</p>	<p>Example added at 5.8.</p> <p>Text to be changed</p>

			The final sentence incorrectly paraphrases draft City Plan 42. This policy sets out a positive approach to building height instead.	Text changed
			<p><b>x. Para 5.10</b> Please describe how the list of unlisted buildings of merit in App 1 was updated by the Forum.</p> <p>The presumption for unlisted buildings of merit to first be considered for refurbishment is inconsistent with the presumption in favour of development as set out above.</p> <p>The final sentence (The whole Plan.....and walking) does not relate to the rest of the paragraph or the policy. It is suggested that it's removed, as it's dealt with in other policies in the plan.</p>	Text added to explain street survey of all unlisted buildings of merit  Text altered  Text modified
	WCC		<p><b>xi. Para 5.11</b> The design guide is noted but has little material weight in practice. The Forum is encouraged to include local design principles in the policy instead or in addition to the design guide, as suggested above.</p>	The design guide is deleted
			<p><b>xii. Paras 5.12-5.15</b> Unclear if these paras are part of the justification of the policy. To a certain extent they repeat the context set out earlier in the plan (chapters 1-3). The text also covers elements that are not further addressed in the plan (short term lets). It is suggested that any justification for PR2 is included in the justification after</p>	review

		the policy and any general context is included in earlier chapters of the plan.	
		<p><b>xiii. PR2 Housing Provision</b></p> <p>The support for new housing development is supported and in line with the draft City Plan that seeks to step up housing delivery. It seems that the Forum has not chosen to identify a local strategy for the provision of homes by for instance the identification of sites. The Council wishes to bring to the forum’s attention that a NP has the opportunity to shape the area by setting out local (non-strategic) policies for how and where this housing should be delivered. Instead this policy is very general with requirements that are largely already covered by London and WCC policies as detailed below.</p>	Review but opportunities for new housing very limited, only wind-fall sites/buildings. No vacant sites available in the plan area.
		<p><b>xiv. PR2 – sub a</b></p> <p>Existing housing provision is already protected from change of use through draft City Plan 8. This policy does this in more detail by protecting all residential uses, floorspace and land, unless where the specific needs can be better met. Not necessary to protect housing through the NP.</p>	noted

			<p><b>xv. MD2- sub b</b>  Unclear what ‘at least’ dual aspect’ means. Draft London Plan D4 already sets out that the provision of dual aspect accommodation should be maximised and sets out detailed considerations for when this is not achievable. This is supported by the <i>London Housing Design Guide</i>. Draft City Plan policy 13 sets out further requirements to assure high quality housing.</p> <p>In practice it may not always be achievable to deliver all units as dual aspect. A requirement for all development to be dual aspect limits the potential to deliver high quality homes, limiting sustainable development and impacting on the ability to meet Westminster’s housing target set out in draft City Plan policy 8.</p> <p>Further requirements around space standards and amenity space are already set out in more detail in draft City plan policy 8, and therefore do not need to be repeated.</p>	<p>Review, Checked with London Housing Design Guide. PR2 b changed to ‘should not to single aspect <u>if north facing</u>...</p> <p>Dual aspect is not absolutely essential but is desirable and contributes in our view towards ‘high quality homes’. North-facing dual aspect housing is strongly discouraged. Complaints have been made by residents of single aspect homes at Rathbone Square. These homes were deemed ‘affordable’ and were sold at below market value.</p> <p>Added for clarity and consistency</p>
			<p><b>xvi. PR2 –sub c</b>  Draft City Plan policy 13 sets out in more detail how housing should be designed well.</p> <p>The approach to be ‘tenure blind’ is broadly in line with draft London Plan policy D4 that seeks to maximise tenure integration. For including such a requirement in the plan, it is expected that further justification or</p>	<p>Broad principles are set out in the NP and strategic policies are referenced in relation to each policy area.</p> <p>Noted and additional text added. Recent developments have placed affordable housing off-site as with Rathbone Square where affordable housing was provided at 46-50 and 51 Mortimer Street &amp; 88 Great</p>

			guidance is provided on why this is a particular issue in the plan area and how this can be achieved.	Portland Street. Tenure blind housing can be provided if well designed and consistent design standards and materials are applied.
			<b>xvii. PR2 – sub d</b> This statement of support for affordable housing overlaps with the statement under sub d to encourage affordable housing owned by registered providers. These ambitions should be merged to avoid repetition and avoid conflict.	No, affordable housing via S106 is different to direct provision by a registered provider. All types of affordable housing now combined in one paragraph. Registered providers are strongly preferred.
			<b>xviii. PR2 – Sub e</b> Draft City Plan policy 11 already sets out requirements to meeting housing need for different groups including specialist housing and older people’	Noted but NP aims to inform plan users of strategic policies as well as local applications.
			<b>xix. PR2 – sub f</b> Requirements for waste management facilities in developments are already set out in draft City Plan policy 38. It is unclear what the requirement for refuse storage in the draft plan adds to this.  Community meeting space and storage space provide separate functions. It is unclear why they are combined in this policy and what this is trying to achieve as this is not set out in the justification. The threshold of 5 units is also not justified. It will not be appropriate to provide such space in all developments of 5 units or more. The facilities required in a specific development vary and	Noted but NP aims to inform plan users of strategic policies as well as local applications.  Considered to be an important local requirement because of extent of dumping of rubbish on pavements because many residents have no storage space.

		depend on the identified needs. If a specific need has been identified the Council will normally seek to facilitate this through the development. A blanket requirement for community and/or storage space will not be effective or appropriate.	
		<b>xx. PR2 – sub g</b> It will not necessary to cross-reference Westminster policy within the policy text. It is also unclear why a car parking clause is included.	Clarification needed between draft London Plan policy which says all developments should be car-free and WCC's draft plan which requires some off-street parking in Fitzrovia.
		<b>xxi. PR2 – sub h</b> The council acknowledges the issue around second homes and particularly those left empty. The forum's efforts to try to address the issue are laudable. However, we have concerns over if the principal residence test is effective in addressing this and have concerns over its legality and application. It is recognised that there are a high number of second homes in Westminster – 3,100 as set out in the draft City Plan. Although there is no specific data for the Fitzrovia West area, the draft plan sets out that there are 515 second homes within the West End Ward. Further arguments for introducing the principal residence requirement are high prices in the area and the lack of affordable homes. The council would like to see evidence on how the principal presidency	Text reviewed but principles retained because issue is regularly mentioned by residents.

			<p>requirement will be effective in meeting these objectives. Experience from other neighbourhood plans in the country has taught us that such requirement has little impact in addressing the second homes issue. There is no data to establish if mainly new build or existing homes are used as second homes. Existing homes will stay unaffected and might gain more interest from second home buyers, leading to increased house prices. They might also move their interest to other areas in Westminster or Central London, moving rather than addressing the issue. The possibility to own multiple homes in London is also not affected by this requirement. There is also the potential that viability and development interest may go down, affecting the deliverability of homes in the area. It is also unclear how the policy should be enforced. The plan fails to set out how the condition or legal agreement should be established and how this should be monitored and enforced. There are considerable implications that will need to be overcome for such requirement to work in practice. The proposed principal residence requirement is not sufficiently justified, may be ineffective and undeliverable, both in terms of being able to work in practice as impacting on the deliverability of homes. This could impact on the ability to deliver sustainable development and the City Plan's housing target. The council is happy to engage with the forum in further discussions on the empty homes issue to seek to address it on a Westminster or London-wide level.</p>	
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		<p><b>xxii. PR2 – sub i</b></p> <p>Draft City Plan policy 9 sets out the affordable housing split for Westminster with 60% as intermediate affordable housing for rent or sale and 40% for social or London Affordable Rent. The draft policy is not in general conformity with the draft City Plan as it states that affordable housing should solely be rented and transferred to a registered provider. It is requested that this policy clause is removed.</p>	<p>The sale of ‘affordable’ housing at below market value is not accepted because it becomes market housing when first owner sells on. Social and intermediate housing directly meets the needs of those unable to pay market rents or prices in Westminster. This is essential to preserve the diversity and social cohesion of the area. Shared ownership can be acceptable in some cases.</p>
		<p><b>xxiii. MD2 – sub J</b></p> <p>The design rationale in Building for Life 12 is generally supported but it is not considered to be appropriate to require developments to comply with this. These areas might be appropriate in areas with weaker design policy and guidance available. Instead it is suggested (as commented above) that the forum develops local design principles for the area in policy MD1. If necessary, the standards could be referenced in the justification as a good practice guide.</p>	<p>Is this correct? Surely BfL 12 can apply to all areas (but is not mandatory). WCC have not said why not relevant to them.</p>
		<p><b>xxiv. MD3 – Hostels and Student Accommodation</b></p> <p>The loss of housing to student accommodation is already prevented by draft City Plan policy 11. The loss of community facilities is already prevented by draft City Plan policy 18. The draft policy does not change or add a local component to these policies and should therefore</p>	<p>This policy has been deleted</p>

		<p>be removed. Requirements for waste management, cycle storage and servicing set out in the draft City Plan apply, like for other developments, also for hostel/student accommodation proposals. It will not be necessary to set out these requirements separately. There is no justification attached to this policy. It is therefore unclear what it is aiming to achieve. If a need for hostel or student accommodation is identified, the forum is encouraged to allocate sites to meet these needs.</p>	
		<p><b>xxv. Para 5.16</b>  This paragraph is not logically structured. It will be better to break up into paragraphs around a specific that lead up to a specific argument instead of a collection of different statements without a clear purpose. A significant portion of this paragraph repeats existing Westminster policy and it is unclear to what purpose. It is not necessary to repeat Westminster or London policy, also in the justification unless this is clearly used to justify a local approach in the policy. Draft City Plan policy 9 provides a more up-to-date position on affordable housing provision which this section should be in general conformity with.</p>	Text revised
		<p><b>xxvi. Para 5.17</b>  It is positive to see that this the provision of housing is also a priority in the plan and that this was supported during public consultation. Please refer to the comments above with regards to a local approach to housing</p>	Not clear. Principal residence conditions and WCC's floorspace limit of 200 sqm will limit super-prime properties.

		<p>delivery. It is noted that many representations were received to oppose further 'super-prime' housing. However, this issue does not seem to be addressed in the draft plan. It is therefore unclear why this statement is included in the justification of policies MD2 and MD3.</p>	
		<p><b>xxvii. Paras 5.18 and 5.19</b>  These paragraphs present helpful information on house prices and households in the area. Some of this information is already provided in chapter 2 of the plan. The early chapters of the plan seem to be a better location for contextual information. Such information should only be included (and repeated) in the justification of a policy if this helps to justify the policy. However, this analysis and justification is currently missing.</p>	<p>Noted and text revised to explain the context and background information without duplication and with greater clarity.</p>
		<p><b>xxviii. Para 5.20</b>  Please refer to earlier comments with regard to a local approach to the delivery of homes.</p>	<p>Noted, the local approach has been emphasised on pages 19-24 of the draft plan.</p>
		<p><b>xxix. Para 5.21 and 5.22</b>  These paragraphs summarise the approach in the London Plan and draft City Plan towards the delivery of affordable housing. Support for this approach is welcomed, but unnecessary to be included in the draft plan. Although support is expressed in these paragraphs, draft policy MD2 is not in general conformity with this approach. It is requested that the approach to</p>	<p>As above, this is a local application of policy for reasons stated.</p>

		affordable housing is amended or removed in line with comments made above.	
		<b>xxx. Para 5.23</b> Please refer to comments made above.	Noted
		<b>xxxi. Para 5.24</b> It is assumed that the approach to principal residence is referred to, but this unclear. Instead of just quoting objectives from the NPPF, it will be helpful if set out in detail how these objectives are met by the policy approach. As set out above, the policy will need further justification and explanation.	Text revised and justification added on pages 19-24
		<b>xxxii. Para 5.25 (Tourism etc)</b> The approach to protecting A1 uses (at all cost) is not in general conformity with the draft City Plan (through draft policy 15) as this allows for further diversification of town centres, involving the loss of A1 uses under certain circumstances to provide complementary town centre uses to maintain the attractiveness of town centres as they evolve over time. The issue around clutter in the public realm might better be addressed in the policies around the public realm, such as parts of policy GS2, as this also applies to other land uses than tourism, arts, culture and entertainment. As mentioned previously, it will be helpful if all text to justify a policy approach is located in the same section after the policy.	While the protection of A1 retail uses is desirable it is accepted that these uses are declining and increasingly replaced by A2 and A3 uses. Permitted development rights for change of use have also been relaxed. The NP policies have been reworded to reflect this.

		<p><b>xxxiii. MD4 Tourism, Entertainment and Night-Time Uses</b></p> <p>It is worth considering if the policy title should align with the section it sits in (currently 'Tourism, Arts, Culture and Entertainment'). Please number the clauses in this policy.</p> <p>The draft policy encourages large tourism and entertainment uses (&gt;500 sq m) to the north Oxford Street frontage and the area north of Mortimer Street. The justification of the policy states that there is a desire to locate certain tourism and entertainment uses away from main residential areas, particularly the area between the north side of Oxford Street and Mortimer Street and eastwards to the Tottenham Court Opportunity Area. The policy approach is not sufficiently justified and does not seem to be effective in achieving the desired outcome. The draft policy encourages uses of a certain scale to be located in certain areas. This does not prevent these uses from locating outside of these areas and is therefore not very effective. To support such restriction, evidence will be required around the scale of the issue. The draft City Plan (through draft policy 17) follows an impact-based approach to entertainment uses. Besides size there are many other factors that affect the impact of an entertainment use on its surroundings. If a size threshold is implemented, this will need to be robustly justified. It is currently unclear why the 500 sq m threshold is followed. With regards to hotels, draft City</p>	<p>amended</p> <p>text revised</p>
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		<p>Plan policy 16 restricts new hotels in streets in the CAZ that have a predominantly residential character. This approach could be followed in the draft plan by identifying streets that have a predominantly residential character. However, this should be sufficiently justified.</p> <p>Paragraph 6.1 of the draft plan sets out that the area between Oxford Street and Mortimer Street has a predominantly commercial character, which contradicts with the identification of this area as being predominantly residential as set out in paragraph 5.26. This undermines the approach in the policy. Draft City Plan policy 2 supports an improved retail and leisure experience within the WERLSPA. Restricting the size of such uses could limit growth in this sector. The draft policy seeks to discourage large hotels and entertainment uses in certain parts of the WERLSPA, and encourage these uses in areas that fall outside of the WERLSPA. This will need to be further justified and the policy should not undermine the strategic priorities of the WERLSPA as set out in the City Plan</p>	<p>Incorrect interpretation of 5.26. The area in question has a smaller residential population and major tourism developments are directed towards streets with a lower resident population in the south of the area.</p> <p>See above</p>
		<p><b>xxxiv. PR4 – Culture</b></p> <p>The council supports the ambition to promote cultural facilities and provide alternatives for alcohol consumption. However, the wording of the policy clause numbered '3' is unclear. This policy clause reads as a general ambition that better forms part of the justification. The policy also states that cultural uses are particularly supported north of Oxford Street and as far</p>	<p>Text reviewed. We restate the Council's policy for clarity and consistency so that residents and businesses are fully aware of the intention to direct major cultural uses to the southern part of our plan area (designated WERLSPA).</p>

		<p>as Mortimer Street. This area is designated as WERLSPA in the draft City Plan, and these uses are therefore naturally supported (see draft City Plan policy 2). It is unclear what this clause adds to existing policy and how this should be applied. Instead the forum may want to consider defining what existing cultural facilities are particularly important in the area and identify the need for specific types of cultural facilities, as well as specific locations in the plan area to accommodate these.</p>	
		<p><b>xxxv. PR4 – Impact Assessments</b>  Impact assessments for entertainment uses are already required by draft City Plan policy 17 and it is not necessary to repeat this</p>	Included to inform Plan users
		<p><b>xxxvi. PR4 – Agent of Change</b>  The Agent of Change principle is already set out in the draft new London Plan and the draft City Plan. It will not be necessary to repeat this.</p>	Included to inform Plan users
		<p><b>xxxvii. PR4 - Tables and Chairs</b>  This clause repeats and refers to existing Westminster standards. It will not be necessary to repeat this. Draft City Plan policy 44 also sets out a more detailed approach to creating an accessible public realm. It is suggested that this clause is removed, or that it is made more locally specific. As mentioned above, clutter in the public realm also relates to other uses than those addressed in the policy and are therefore better addressed in a separate/other policy.</p>	Add local condition about minimum width of pavement.

		<p><b>xxxviii. Para 5.26</b>  The ambition with regards to a night-time economy vision applies to boroughs rather than neighbourhood forums and is therefore not necessary to include. The council is currently preparing a vision for the evening and night-time economy. As commented above, the statement that the area between Oxford Street is predominantly residential conflicts with paragraph 6.1 of the draft plan which identifies this as a predominantly commercial area</p>	<p>Misreading of 5.26. The area referred to has a low residential population.</p>
		<p><b>xxxix. Para 5.27</b>  The reference to licensing policy in paragraph 5.27 is noted but outside the remit of a neighbourhood plan as this is dealt with by a separate regime and therefore not necessary to include. The remainder of the paragraph summarises/repeats Westminster policy which is unnecessary as this does not justify the policy approach. This includes the protection of public houses which is addressed through draft City Plan policy 17.</p>	<p>Included to inform Plan users</p>
		<p><b>xl. Para 5.28</b>  This paragraph largely repeats the policy text, which is not necessary to do. Please refer to our comments above with regards to the approach to cultural facilities.</p>	<p>Included to inform Plan users</p>
		<p><b>xli. Para 5.29</b></p>	<p>noted</p>

		<p>This paragraph provides a helpful context to community facilities in the (surrounding) area. This may better fit in the earlier chapters of the plan or in the justification of the plan, in line with previous comments.</p>	
		<p><b>xlii. PR4 Retaining and Expanding Community Facilities</b>  Please consider if it will be helpful to match section and policy titles, as highlighted before</p> <p>The policy is not in general conformity with the draft City Plan as it conflicts with draft policy 18. The draft policy also contains contradicting statements that make it hard to apply. The draft policy uses different terminologies interchangeably, namely community and leisure facilities, social infrastructure, and community, health and sports facilities. All these types of facilities are covered by the definition of community infrastructure and facilities in the draft City Plan, and it is requested that consistent terminology is used in the draft plan. The draft City Plan (through draft policy 18) protects community infrastructure and facilities but allows their loss in certain circumstances, namely when their loss is necessary to improve service provision or there is no demand for an alternative social or community use for that facility or floorspace. The draft policy protects such uses but in the same sentence allows for their loss when they are re-provided in the plan area. This is contradicting and does not have regard to the situations where loss may be acceptable as set out above. Deprovision in the plan area may not be</p>	<p>Text reviewed</p>

		<p>appropriate as loss may be as part of a strategy to improve services, and there may be sufficient cover outside of the plan area. The draft policy also sets out that redundant social infrastructure should be considered for use as other social infrastructure before considering alternatives. Draft City Plan policy 18 already achieves this by making sure there is no demand for alternative community or social use for that facility or floorspace before loss is considered. Draft City Plan policy 18 already sets out requirements for new community infrastructure and facilities to meet identified needs and to encourage access for local communities. The final paragraph of this policy adds very little to this. The draft policy is largely duplicating and conflicting with draft City Plan policy 18. If a policy on community facilities is to be retained this could focus on the specific facilities that are important in the local area, and it could identify needs for specific needs for new facilities informed by a local evidence base.</p>	
		<p><b>xliv. Para 5.31</b> This para is supported but could be expanded in line with comments and suggestions above.</p>	noted
		<p><b>xlv. Supporting Business Development and Uses</b> It is unclear how policy B2 contributes to objective 6. It seems that this policy more strongly contributes to objective 5. The policy that appears to most strongly contribute to objective 6 is policy T2 in chapter 9. It is suggested that the objectives are re-ordered to reflect this.</p>	Text clarified

		<p><b>xlvi. Paras 6.1 – 6.5</b>  Paragraph 6.1 conflicts with earlier statements in the draft plan in paragraph 5.26 that this area is predominantly residential. These paragraphs provide a helpful context around commerce in the area. Some of the text is used to justify the policy approach in policies B1 and B2, and should therefore be located in the justification of these policies. The remainder provides a general context which better sits in the earlier chapters of the plan.</p>	Review but we will clarify 5.26 if necessary
		<p><b>xlvii. Small Business Units</b>  The council supports Fitz West’s ambition to protect and provide small business units. The draft policy is however not in general conformity with the draft new London Plan and should be changed to be more effective. Draft new London Plan policy E2 seeks to provide suitable business space in terms of type, use and size and at an appropriate range of rents to meet the needs of micro, small and medium-sized enterprises (SMEs) and start-ups. The draft policy only considers the size of business units. This approach ignores the other considerations that impact the suitability of business space and may therefore not be effective in supporting SMEs. It is insufficiently justified why is focused on size as the only consideration. The size threshold of 300 sqm is also not justified. A size threshold limits the potential to provide spaces that are of a different size but might be better</p>	Review and add additional information from local agents about need for small units of 1000 – 1500 sq.ft. Also there has been a rapid growth in serviced workspace for small businesses and start-ups. FORA is a major provider with two buildings in Berners Street.

		<p>able to meet the needs of SMEs. Draft new London Plan policy E2 requires B use classes greater than 2,500 sq m to consider scope to provide a proportion of flexible workspace or smaller units available for SMEs. This recognises that smaller units may not be the only way to meet the needs of SMEs, but that this could also be achieved by provision of flexible workspace. The draft policy does not conform with this. The London Plan however allows for a locally determined lower threshold than 2,500 sq m in a local development plan document. Although a neighbourhood plan is not a development plan document, the council considers that a locally determined threshold in a neighbourhood plan may be appropriate when sufficiently justified. The draft plan does not set out how it arrived at this threshold. The threshold is with 1,000 sq m significantly lower than that in the draft new London Plan. This could limit the potential to deliver commercial space. The further requirement to require at least one small business space per 1,000 also impacts deliverability and is not found to be either effective or appropriate. By setting out detailed thresholds for small business units the policy limits the potential to adequately meet the needs of SMEs in line with draft new London Plan policy. The principle of protecting and encouraging small business units is generally supported but should be reworded to take account of these comments. The forum is encouraged to identify specific local needs for SMEs and identify locations and opportunities to meet this. This will add a local component to the draft new London Plan</p>	
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		policy. The policy misses a justification after the policy, unlike the other policies in the draft plan. A justification will be required, as commented above.	
		<b>xlvi. Para 6.7</b> It is suggested that this paragraph is included in either the context chapters or the justification of policy B2, in line with previous comments on justifications.	agreed
		<b>xlvi. B2 Retail and Related Uses</b> Draft City Plan policy 15 identifies A1 as a priority use in town centres. The policy also sets out when the permanent loss of A1 uses will be considered, subject to 18 months marketing. The wording of the draft policy largely overlaps with draft City Plan policy 15, which sets out a more detailed approach. The draft policy also states that applications for CAZ retail clusters will need to be considered in the light of draft City Plan policies. It is not necessary to repeat or cross-reference draft City Plan policies. It is requested that this is removed from the draft policy. The requirement for paying attention to providing a vibrant and attractive street frontage is supported, although the policy would benefit from a local approach to how this can be realised.	Text reflects local priorities and references strategic policy in order to explain how local policy relates to it.
		<b>xlvi. B2 – Small Retail Units</b> The ambition to protect and encourage small retail units by the forum is supported. Draft City Plan policy 15 supports the provision of a range of retail unit sizes including small stores. The draft policy requires the re-	Noted and text clarified

			<p>provision of small retail units in redevelopments. However, it is insufficiently justified why the re-provision of small retail units should be provided in redevelopments. This limits the ability of the market to respond to trends. The City Plan follows a more flexible approach. It is worth considering if unit size is the appropriate mechanism to manage shops when affordability may be more appropriate in line with the draft new London Plan. The draft policy requires at least 10% of large retail developments (&gt;2,500 sqm) to be provided for small units. Draft new London Plan policy E9 sets out that boroughs should consider the contribution that large-scale commercial development proposals (&gt;2,500 sqm gross A class floorspace) can make to the provision of small shops and other commercial units. It also states that where justified by evidence of local need, policies should secure affordable commercial and shop units. The approach in the draft policy is therefore broadly in line with the draft new London Plan, although it focuses on size rather than affordability. Further evidence on local need will be required to justify a 10% requirement for small shops in large retail developments. This approach will also not be appropriate across the whole plan area. Particularly in the International Centre the provision of small shops will not be appropriate as these do not relate to the role and function of the International Centre in line with draft City Plan policy 15.</p>	
			<p><b>I. B2 – Parades of Shops</b></p>	

		<p>Parades of shops such as CAZ retail clusters are already protected through the draft City Plan, in particular through draft policy 15. Permitted Development rights limit the potential to protect A1, A2 and A3 uses as they are permitted to change to certain other use classes without planning permission. It is therefore not clear what this policy is trying to achieve. As the protection of these parades is already covered by the draft City Plan it is requested that this paragraph is removed from the draft policy.</p>	<p>This text is considered in conformity with policy 15 in WCC draft plan</p>
		<p><b>li. B2 – International Centre</b>  The draft policy seeks to protect retail floorspace at ground and first floor levels within the International Centre. This is already covered by draft City Plan policy 15 and therefore does not need to be repeated. The draft plan proposes that with long term vacancies of over a year a range of other uses should be considered. This contradicts the statement earlier in the policy which requires for an 18 months marketing period. This requirement is also set out in draft City Plan policy 15, which also sets out further considerations for non-A1 uses. The uses suggested in the draft policy may be supported as main town centre uses, but will need to satisfy the requirements of draft City Plan policy 15. It is therefore unclear what the draft policy adds to the approach in draft City Plan policy 15, which also contains more detailed criteria to manage retail uses within the International Centre. It is therefore suggested that this paragraph is either removed or reviewed to add a local</p>	<p>Included to inform Plan users. Local component added.</p>

		component for the stretch of the International Centre that is within Fitzrovia West.	
		<b>lii. Para 6.9</b> This should form part of the justification of policy B1	noted
		<b>liii. Paras 6.10-6.11</b> Further justification will be required to respond to the comments above. Please state to what version of the City Plan is referred to.	Justification added and 'draft' added to City plan
		<b>liv. 7. Green and Open Space</b> Open space and play space provision is required through policies PR1 and PR2. As suggested above, these elements better are better addressed by policies in this chapter. Objective 9 covers meanwhile uses wider than open space. Policy B2 also contributes to this objective.	Noted but for clarity the need for open space is referred to in PR1 And PR2
		<b>lv. paras 7.1, 7.2</b> These paragraphs are used to justify the policy approach and should therefore be integrated into the justification of policies GS1 and/or GS2.  It is unclear if the priorities ambitions in paragraph 7.1 are the forum's or relate to the adopted City Plan, please clarify. The draft City Plan sets out an updated approach to open space and play space, which is encouraged to be referenced instead. The reference to Figures 3 and 4 in this paragraph appears to be incorrect	Review  Noted. Corrections to figures made. Extract from draft City Plan indicates location of Fitzwest.

			(should be 4 and 5). Figure 5 is an extract from the draft City Plan but is not very clear. Please get in touch with us with your requirements as we are available to provide a suitable map to be included instead.	
			<p><b>lvi. GS1 Protecting and Enhancing existing green and open spaces</b></p> <p>The ambition of the plan to protect and enhance existing green and open space area is supported. This aligns with draft City Plan policy 35 that seeks to protect and enhance green infrastructure.</p> <p>The draft City Plan protects all green infrastructure and open spaces in particular. It is encouraged to set out in neighbourhood plans what spaces are of particular importance in the local area. The designation of such areas is therefore supported. The justification of the policy only justifies two of the areas (Pearson Square and Rathbone Square). Further justification will be required to support the designation of the other areas in the policies. It would also be helpful if the areas could be shown on a map in the plan. Council officers may be able to help the forum with this.</p> <p>The principle for development to adjacent open spaces to safeguard the space is supported and broadly in line with draft City Plan policy 35 that seeks to protect and enhance the functions of open and green spaces. In addition to safeguarding these spaces, the forum is encouraged to identify ways to enhance existing green</p>	<p>Noted</p> <p>Noted</p> <p>Biodiversity etc not considered relevant because there is so little green space in the area (one of which is covered in Astroturf and very limited planting in planters.</p> <p>Noted and welcomed</p>

		and open spaces in the plan area including access, biodiversity, climate change mitigation and other functions.	
		<p><b>lvii. Creating new green and open spaces</b></p> <p>The ambition to promote the greening of the area is supported.</p> <p>Draft City Plan policy 35 requires all major developments to provide new or improved public open space and space for children’s active play. The draft policy restricts this to major developments over 0.5 hectare. It is unclear what the justification for this further restriction is as it goes against objectives 7 and 8 of the draft plan.</p>	<p>Noted</p> <p>Text revised t remove restriction</p>
		<p><b>lviii. GS2 Landscape plan</b></p> <p>The draft policy provides detailed guidance on landscape plans, adding detail to draft City Plan policy 35. This guidance needs to be in line with Westminster’s Trees and the Public Realm SPD.</p> <p>Greening measures will also need to be appropriately designed and of the right type. The council is preparing a green infrastructure strategy that will provided further guidance on this.</p> <p>For clarity and ease of navigation, is encouraged to divide the policy in four bullet points as there are four distinct points that the policy is seeking to address:</p>	<p>Noted</p> <p>Noted</p> <p>Not clear what is missing here</p>

		<p>Adequate space for tree planting and greening, infrastructure changes to allow for future tree planning, greening measures and maintenance arrangements.</p> <p>It is encouraged for the policy to focus primarily on the [.....] rather than the means (landscape plan).</p>	
		<p><b>lix. GS2 Public realm</b></p> <p>The council supports the forum in identifying local public realm improvement priorities. This is the strongest local policy approach in the plan and it is therefore worth considering if this should be set out in a separate policy.</p> <p>It is noted that these projects are conceptual as they have not been subject to further testing, for example on highways impacts. Please acknowledge these limitations in the document.</p> <p>In addition, further and continued discussions with the council's Place Shaping team will be required as several of the projects fall within the Oxford Street District. There is an opportunity for the council and the forum to work together on the implementation on these projects when they contribute to the ambitions of the Oxford Street District project. The plan will need to acknowledge that these projects are subject to further discussions with the council.</p> <p>Please remove the reference to paragraph 7.5 as this is</p>	<p>Support noted</p> <p>Discussions are continuing</p>

		<p>not policy text. This paragraph should be located in the justification of the policy and thereby aid its application.</p> <p>Please reword the final bullet point along the lines of utilising space better to facilitate the move away from the car.</p>	<p>noted</p> <p>Noted</p>
		<p><b>ix. GS2 Meanwhile uses</b> The statement on temporary and meanwhile uses is supported.</p>	<p>noted</p>
		<p><b>ixi. Para 7.5</b> This paragraph should be included in the justification of the policy. The text refers to figure 5 which is numbered as Figure 7.</p> <p>Further detail on how these projects have been identified and what the limitations are in line with comments above will be required. Please also refer to the Oxford Street District project and the need to co-operate with the council in implementing these schemes. It may be possible to show the Oxford Street District area on the figure 7 – please get in touch if we can assist.</p>	<p>Will correct</p> <p>noted</p>
		<p><b>ixii. Para 7.6</b> The draft City Plan identifies (part of) the area as deficient in open space and/or play space. Please correct this statement and include a reference to the draft City</p>	<p>Will check</p>

			Plan.	
			<p><b>lxiii. Para 7.7</b>  It is unclear what the purpose of this paragraph and what policy approach it is seeking to justify. It should therefore be removed.</p> <p>It is unclear what the support for boroughs to undertake a green space needs assessment means. As part of the recent consultation on the draft City Plan an audit of open spaces was published.</p> <p>The London Plan standards have informed the audit of open spaces which identified the open space and play space deficiencies.</p> <p>The Urban Greening factor is set out in the draft new London Plan and it is therefore not necessary to say that this should be applied.</p>	review
			<p><b>lxiv. Para 7.8</b>  It is unclear to what spaces 'such spaces' refers to. This may be the result of a restructure of the text.</p> <p>This paragraph is mainly focused at addressing the heat island effect. Although it is acknowledged that green space can play a role in addressing is, the policy is silent on this issue. Green infrastructure has many functions but it is not necessary to provide further detail on them</p>	Review

		<p>unless the policy provides specific guidance on them. Addressing the urban heat island effect is also not covered by the objectives of the plan</p> <p>There is very little reference to heat in the Urban Movement report so it is questioned if this reference is correct. We are also unable to find the research paper on the urban heat island effect at FitzWest from 2019.</p> <p>In light of the above, please consider if this paragraph is necessary.</p>	noted
		<p><b>lxv. Para 7.9</b> This paragraph should be expanded to include justification on the requirement for a landscape plan and its detailed requirements. What are the local issues that justify the policy requirement?</p>	Add local context
		<p><b>lxvi. 8. Environmental Standards Objectives</b> The policy title of policy EN1 is incorrect. As mentioned previously, some objectives are impacted on by several policies in other chapters. This is the case for objective 10, for instance by policies MD1 and MD4. Policy EN1 also contributes to objective 11. It is therefore suggested to remove this section from the chapters.</p> <p>'Policy EN2' should be in bold for consistency (if remained)</p>	review

		<p>lxvii. Paras 8.1 – 8.3</p> <p>These paragraphs form part of the general context and should therefore be located in the earlier chapters of the plan, or when it is used to justify a policy approach in the justification of that policy. They mainly focus on data for London and Westminster. The forum is encouraged to focus on the environmental issues in the local area.</p>	noted
		<p><b>lxviii. EN1 Promoting improved environmental sustainability and air quality</b></p> <p>The council supports the ambition to improve the local environment.</p> <p>However, the policy does not add detail to existing policy. On the contrary, Westminster and London policies set out in more detail how the local environment should be improved, for instance by draft City Plan policies 33, 34 and 37.</p> <p>The wording of the passive ventilation requirement needs to be improved to fit in with the rest of the policy.</p> <p>The policy also overlaps with draft policy EN2. The (frequently repeated) requirement to maximise energy efficiency and minimise energy use can be included in this policy. Draft policy EN2 can then focus on renewable energy.</p> <p>The justification for the policy is weak and will need to</p>	<p>Good to hear!</p> <p>Check and adjust wording</p> <p>Check and adjust wording</p>

			be improved.	
			<p><b>lxix. EN2 Renewable Energy</b>  The policy is about more than renewable energy and the title may therefore need to be changed, depending on how comments will be addressed.</p> <p>The justification for the policy does not justify any of the policy approach. Any approach to energy efficiency or renewable energy will need to be justified.</p>	<p>Revise</p> <p>Justification added</p>
			<p><b>lxx.EN2 Clause 1</b>  Draft City Plan policy 37 already seeks to minimise the impacts of climate change by reducing energy demand, maximising energy efficiency and promoting renewable energy. The first clause of the draft policy does not add any detail to this or sets out a local approach and should therefore be removed.</p>	To be reviewed
			<p><b>lxxi. EN2 Clause 2</b>  The first half of this clause repeats the requirement to minimise energy use and maximise renewable energy from the first clause. This is already set out in draft City Plan policy 37 and should therefore be removed.</p> <p>The approach to minimise non-renewable energy in comparison with the development it replaces is not in</p>	To be reviewed

			<p>general conformity with the draft City Plan or draft new London Plan which follows the energy hierarchy to minimise energy demand. Draft new London Plan policy S12 also sets out targets for on-site reduction to achieve the zero-carbon target. Developments should achieve these targets instead of using the existing building as a baseline.</p> <p>The list of requirements that follows is broadly supported although this already largely covered by Westminster of London policies.</p> <ol style="list-style-type: none"> <li>1. This again repeats the requirement to minimise energy use and maximise energy efficiency. This is already set out in draft City Plan policy 37 and should therefore be removed or covered by EN1 as this will be remained in some shape or form.</li> <li>2. The wording and example are unclear. The wording should be changed for renewable energy systems to be sited and operated to maximise energy efficiency. This maximises the impacts of renewable energy systems what is implied to be the intention of this requirement.</li> <li>3. Although the intention is understood, the wording used is confusing. Instead 'sub a' can be expanded to apply to both regulated and unregulated use. This will be a local requirement</li> </ol>	<p>To be reviewed</p>
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		<p>that goes beyond existing policy. Justification for this approach will be needed.</p> <p>4. The ambition to maximise on-site renewable energy efficiency is supported. Not only conservation area but also wider heritage impacts will need to be considered.</p>	
		<p><b>lxxii. Clause 3</b>  The issue around adaptation and historic buildings is already set out draft City Plan policy 40. It will therefore does not need to be repeated. However, if the draft plan is intending to include any local standards or principles on energy this should give sufficient consideration to the impact on the historic environment.</p>	review
		<p><b>lxxiii. Figure 9</b>  The urban heat island is already covered in paragraph 7.8. It is unclear why this figure is included here. Please refer to our comments to paragraph 7.8.</p> <p>The inset is also not very clear. Please get in touch with us for any mapping assistance.</p>	Background paper on urban heat island effect added to supporting documents.
		<p><b>lxxiv. Para 8.5</b>  This paragraph provides helpful context on the local air quality issues. It supports the introduction of the T-charge, which is set out in draft policy T1. It may therefore sit better in the justification of that policy.</p>	noted

		<p><b>lxxv. Para 8.6</b>  This focuses on the issue of air quality from road transport and the consolidation of goods deliveries. This is addressed by draft policies T1 and T2, and therefore better fits in the justification of those policies.</p>	noted
		<p><b>lxxvi. Para 8.7</b>  It is unclear what the purpose of this paragraph is. It covers the urban heat island effect which is also covered by paragraph 7.8. It describes the issue but does not identify a local approach or justify the policy. Please also refer to our comments to paragraph 7.8 and figure 9.</p>	review
		<p><b>lxxvii. 9. Mobility and Transport</b>  In line with previous comments, several of the policies in this and other sections contribute to multiple of the objectives. It is therefore suggested that this section is removed.</p>	review
		<p><b>lxxviii. Paras 9.1, 9.2</b>  Please consider if this is part of the overall context or the justification of the policy and therefore be located in relevant sections, consistent with our previous comments.</p>	review
		<p><b>lxxix. T1 Pedestrian movement and sustainable transport</b>  This policy sets out transport ambitions for the plan area, which are supported by the council. The opening sentence of increasing efficiency and movement of people and goods in the area reads as an overarching</p>	

		<p>statement, but perhaps this fits better as one of the policy clauses. Please also consider overlap with draft policy T2 as set out below.</p> <p>The different clauses of the policy are ambitions with little development management relevance. Where they are applicable to the management of development the detailed policy requirements are already set out in London or Westminster policies. It must be clear what the policy is seeking to achieve and how it should be applied. The wording of the policy should therefore be improved to address this.</p> <p>1. T-charge / ULEZ: Support for these initiatives are welcomed. However, it is unclear what development proposals could do to support these.</p> <p>2. Healthy streets: Support for the healthy streets approach is welcomed. Further guidance on what is meant with 'environmental improvements' should be provided.</p> <p>On-street parking: The requirement to meet the Mayor's cycle and car parking standards are already set out in the draft new London Plan and the draft City Plan. They do not need to be repeated. It is also unclear how proposals could 'support increased provision', instead they should just provide what is required.</p> <p>3. Off-street space: Requirements for bicycle storage,</p>	<p>NPs can have non-DM planning objectives as with other development plans.</p> <p>Noted</p>
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			<p>refuse storage and servicing and deliveries are already set out in the draft new London Plan and the draft City Plan. They do not need to be repeated.</p> <p>4. Super-grid: Further guidance will be required on how applicants can contribute to the concept of a super-grid. Further justification on why this is the right approach for the area will also be required.</p>	<p>The super-grid principle is explained in sections 2 and 3 and is based on the grid format of urban form in the area. Grids are made up of different buildings of similar height on a street frontage or forming squares or rectangles.</p>
			<p><b>xc. T2 Improving the distribution of delivery goods to local businesses</b></p> <p>The council supports the forum’s ambition to improve the delivery of goods in the area, reducing traffic flows. This aligns with policy T1’s ambition to provide increased efficiency and movement of people and goods in the area. It is unclear why a separate policy is required as there is a strong overlap with draft policy T1. It is suggested that these policies are merged and restructured, also having regard to comments made above and below.</p> <p>The first paragraph is repeated in the bulleted list: The first sentence overlaps with the final bullet point and the second sentence overlaps with the second bullet point. Duplication should be avoided, and the first paragraph can therefore largely be removed or merged with the relevant clause.</p>	<p>Two policies needed to cover different aspects of transport in the area the first is about pedestrian movement and improved design of streets; the second is about distribution of goods and services which at present generates multiple journeys causing noise, congestion and pollution with adverse effects on businesses and residents.</p> <p>Noted</p>

		<p>5. Reducing traffic flows: This is an overall ambition for the area. Further guidance on how developments can contribute to this will be welcomed in the supporting text.</p> <p>6. Distribution hubs: The approach to distribution hubs is generally supported. The forum is encouraged to work with the council's highways department to identify suitable locations for such hubs in the draft plan.</p> <p>7. EVs: Support for EVs is welcomed, and in line with the draft City Plan.</p> <p>8. This repeats the opening statement of the policy and that of policy T1. It is suggested that these are combined into a single clause in a consolidation of policies T1 and T2.</p> <p>9.</p>	<p>Support welcomed</p> <p>Support welcomed</p> <p>noted</p>
		<p><b>xc. Paras 9.4 &amp; 9.5</b>  These paragraphs do not justify the approaches in policies T1 and T2. Some supporting text on each of the policy clauses will be required, to understand why they are important in the local context and provide further guidance.</p> <p>It will not be necessary to refer to draft new London Plan policy requirements as developments already need</p>	<p>Will be reviewed</p>

			to comply with them.	
			<p><b>xcii. Appendix 1</b> Please make sure that this list is comprehensive and up-to-date. Based on the map provided on page 50 there appear to be more Grade 2* Listed Buildings than included on the list.</p>	Review and update. 59 & 61 Riding House Street added as grade II*
			<p><b>xciii. Appendix 2</b> A note setting out how the list has been checked and updated and by whom will be required.</p>	Checked and updated by Forum members this year
			<p><b>xciv. Appendix 3</b> Consider if 'role' is the correct sub-heading as the section talks about a number of functions.</p> <p>The second sub-heading should be 'monitoring' or similar.</p> <p>1. a) There are no direct funding implications of the policies in this plan so this is not applicable in monitoring the plan. However, projects and their funding can be monitored.</p> <p>2. b) Policies are not considered individually. Instead they are considered together with other policies of the development plan and any material considerations. It will therefore not be possible to monitor if policies have been interpreted correctly. Instead the focus of monitoring should be on if the policies have been effective in</p>	Will be reviewed

		<p>meeting the plan's objectives.</p> <p>3. c) Review of policies is one of the functions of monitoring. The forum is encouraged to include specific monitoring indicators to measure progress.</p> <p>Please add another sub-heading 'reviewing the plan'.</p> <p>To review the plan every 2-3 years may be overly ambitious. Policies in the plan should be robust and sufficiently flexible to be able to be used for a longer period. As mentioned above, the forum is encouraged to set out a monitoring framework to determine when the plan or elements of it need to be reviewed.</p> <p>It is unclear why the reference to the Neighbourhood Planning Act 2017 has been included.</p>	<p>Added</p> <p>That means by us every 2-3 years but not necessarily going through formal procedures to change the plan.</p> <p>Added for clarification</p>
		<p><b>xcv. Appendix 4</b></p> <p>This section will need further thought as it is an unstructured list of broad ambitions. Any non-planning projects should not be included.</p> <p>The forum is encouraged to set out priority projects to the deliver the objectives of the draft plan. This may include any projects potentially funded through the CIL neighbourhood proportion or other funding sources. Details for the projects will be welcomed, including description, timeframe, delivery partners and potential</p>	<p>These are non-planning objectives and that's why they're in this app. Some may be CIL funded but not all. This is a common approach in many NPs.</p> <p>Too early at this stage. This is a list of possible projects but priorities might change</p>

		<p>funding sources. This could identify priority projects.</p> <p>CIL funding may not be used for the operation of the forum, it should be spent on community infrastructure.</p> <p>The forum is not able to set out what the council's priorities should be. CIL monies cannot be used for enforcement purposes.</p>	<p>Noted</p> <p>noted</p>
		<p><b>xcvi. Appendix 5</b></p> <p>Please include all sources that are referenced in the plan. Documents that are not referenced should be removed.</p>	<p>This appendix lists all sources cited and consulted in the preparation of the Plan.</p>
		<p><b>xcvii. Appendix 6</b></p> <p>The definitions in this section do not match with the draft City Plan and/or draft new London Plan. Please remove this section or make sure definitions fully align with the draft City Plan, which provides a much more comprehensive overview of different terminologies.</p>	<p>Wording has been changed</p>
		<p><b>xcviii. Further documents</b></p> <p>We note that a separate delivery and implementation is published on the website. This is not part of the draft</p>	<p>Not sure what this is so will delete.</p>

		<p>plan, and does not fully align with monitoring and CIL appendices in the plan. Please clarify what the status of this document is.</p> <p>In addition, a separate aspirations and longer-term objectives document is published on the website. This is not part of the plan, although it overlaps with some of its appendices. Please clarify what the status of this document is.</p> <p>Next, a separate key sources document is listed on the website. This is slightly different from the key sources included in the draft plan. Please clarify what the status of this document is.</p> <p>Finally, it is noted that a design guide has been published. The council is not providing specific comments on this document at this stage. Instead it refers to comments made to the policies in the draft plan, particularly policy MD1.</p>	<p>All non-planning aspirations are in the appendix in the plan. They are indicative at present and will be worked up in more detail as and when CIL becomes available. There is now no separate document on the website.</p> <p>Supporting documents on the website include a paper on the urban heat island effect and the SEA/HRA screening report which concluded these evaluations are not required in this case.</p> <p>The Design Guide is deleted. Relevant guides and documents are referred to in the Plan.</p>

