

**From:** Simon Birkett  
**To:** [Neighbourhood, Planning; WCC](#)  
**Cc:** Nicholas Bailey; Yoram Blumann  
**Subject:** CAL - Regulation 16 consultation on Fitzrovia West Neighbourhood Plan  
**Date:** 18 July 2020 18:09:29

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Dear Westminster Neighbourhood Planning Team

Please acknowledge receipt.

I am writing on behalf of Clean Air in London (CAL) in response to the Regulation 16 consultation on the Fitzrovia West Neighbourhood Plan (FNP or the Plan) which closes on 4 August.

<https://www.westminster.gov.uk/np-fitzrovia-west>

CAL congratulates the Fitzrovia West Neighbourhood Forum (FNF or Fitzwest) on producing an outstanding draft neighbourhood plan. The Plan covers many crucial matters in a clear and effective manner. It is a model for others to follow.

In CAL's view, the COVID-19 pandemic shows that action to reduce ambient and indoor air pollution to protect public health is more important than ever in order to reduce susceptibility, transmission and the largest environmental cause of disease and recover sustainably from the crisis. For example, please see two recent studies:

<https://www.hsph.harvard.edu/news/hsph-in-the-news/air-pollution-linked-with-higher-covid-19-death-rates/>

<https://rs-delve.github.io/reports/2020/07/06/nosocomial-scoping-report.html>

<https://royalsociety.org/news/2020/07/president-of-the-royal-society-urges-everyone-to-wear-a-face-covering/>

<https://royalsociety.org/news/2020/07/DELVE-hospital-acquired-infections-report/>

CAL draws Westminster, FNF and the Examiner's attention to the need for the FNP to be consistent with Westminster's declaration of a climate emergency (with deadlines) and be in conformity with the London Environment Strategy 2018 (LES) not least in relation to: biodiversity; emissions to the air; climate change mitigation and adaptation; energy; greening; trees; waste and the management of water.

CAL urges the FNF and Westminster to tighten these three policies further so that the end point of zero air emissions will be achieved throughout the Fitzrovia West Neighbourhood Area by the end of the Plan's life (which we think should be 2040 not 2035). This will only be done if all development and refurbishment requiring planning permission is addressed by the Plan.

Please amend therefore three policies as follows:

1. Policy PR1 Promoting Regeneration (page 17 and 18):
  - i. 2(c): Please delete '~~ventilation shafts~~' and insert 'ducting, air filtration and' before 'heating and air cooling plant'. This change would address the fact that buildings may have mechanical ventilation, air filtration and heating/cooling plant.
  - ii. 2(f): Please insert 'or worsening air quality or' after 'urban heat island effect' to ensure that sustainability techniques do not include flawed approaches to offsets, wood burning or decentralised power generation.
2. Policy EN1: Promoting Improved Environmental Sustainability and Air Quality (page 43):

*All ~~applications~~ built development including substantial refurbishments should ~~demonstrate and seek to~~ achieve net zero emissions as soon as practical and in any event by the end of the Plan's life 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 supports these requirements.*

3. Policy EN2: Renewable energy (page 43):

*1. All development including substantial refurbishments must ~~To mitigate~~ minimise greenhouse gas emissions that worsen climate change., developments will be supported where buildings in the designated area, minimise and energy use and maximise energy efficiency and the production and use of renewable energy to meet their needs.*

*2. ~~New~~ All development including substantial refurbishments should demonstrate that all practical measures have been included to minimise the use of non-renewable energy in comparison with the development it replaces.*

Reasoned justification and the glossary in the Knightsbridge Neighbourhood Plan provides further support for these changes:

[https://www.knightsbridgeforum.org/media//documents/knp\\_made\\_version\\_december\\_2018\\_131218\\_website.pdf](https://www.knightsbridgeforum.org/media//documents/knp_made_version_december_2018_131218_website.pdf)

CAL considers that there is no need for Fitzwest to produce more evidence as it can simply set a clearer end point objective in relevant policies, remove hurdles to developers and others to achieve it earlier and encourage 'laggards' to take action within the life of the Plan.

Please notify us of the Council's final decision in relation to the FNP.

Please contact me if you have any questions.

Best.

Simon

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Our **Clean Air in Cities** App reports the health impact of long-term exposure to dangerous airborne particles (PM<sub>2.5</sub>) for the population in local areas, regions and England as a whole. It is available for iPhones, iPads and Android devices and can be downloaded from the appropriate store:

<https://apps.apple.com/gb/app/birkett-index/id646281816>

<https://play.google.com/store/apps/details?id=org.cleanair.london>

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