

From: [Hassan Ahmed](#)
To: info@fitzwest.org; [Neighbourhood, Planning: WCC](#)
Cc: [Anna Turner](#)
Subject: Re: GLA Officer's Response FitzWest Neighbourhood Plan – Submission (Reg 16) Consultation
Date: 03 August 2020 10:58:13

Dear Nick Bailey

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Fitzrovia West Neighbourhood Plan – Submission Consultation (Regulation 16)

Thank you for consulting the Mayor of London on the Submission version of the Fitzrovia West Neighbourhood Plan (FWNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2019, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Fitzrovia West Neighbourhood Area includes the London Plan, the Westminster City Plan and the emerging draft Westminster City Plan 2019-2040.

The Intend to Publish London Plan

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish (ItP) version of the London Plan was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Westminster's Development Plan and contain the most up-to-date policies.

Given the timing, the neighbourhood plan must be in general conformity with the new London Plan. In addition, the ItP version of the London Plan and its evidence base are now material considerations and officers welcome the FWNP's reference to both the published and ItP London Plans.

As currently drafted the FWNP is in general conformity with the current and emerging London Plans and the Officer's response below provides support and offers guidance that should be followed to improve the emerging neighbourhood plan and align it more closely with the ItP London Plan.

General

The emphasis of the plan on heritage, support for small businesses and culture are all very welcome elements. The extent of the neighbourhood area is illustrated clearly, and the planning context established early on in Figure 2, highlighting the rich heritage that lies within the FWNP boundary and includes the 3 strategic views as set out in the London View Management Framework that run through the area. Overarching objectives are made clear at the beginning of each chapter of the document, and this clarity is also welcome by Officers.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. Officers consider that the Neighbourhood Plan would positively contribute towards achieving

elements of sustainable development such as through the provision of green infrastructure and the promotion of walking, cycling and public transport.

The FWNP should note that the most up to date version of the new London Plan is the Intend to Publish (ItP) version [\[1\]](#) and that policy numbering and other amendments have been made to that document. For example, Policy D9 of the ItP London Plan now considers tall buildings and not the original Policy D8. References to the London Plan should be checked against the ItP London Plan as it is the most advanced draft of the new London Plan.

The extent of the neighbourhood plan includes, in its South-eastern corner, part of the Tottenham Court Road Opportunity Area (OA). Indicative targets for the entire OA are for 300 new homes and 6,000 new jobs up to 2041 as set out in Table 2.1 of the ItP London Plan. The FWNP may wish to set out how it can positively contribute towards growth in the OA in line with ItP London Plan Policy SD1 part B.

Housing

The FWNP's aspiration to increase the proportion of on-site affordable housing in draft Policy PR2 and at paragraph 5.20 is noted and welcomed by officers and reflects the approach set out in ItP London Plan Policy H4 and paragraph 2.5.8 which advocates the provision of affordable housing on-site in locations within the Central Activities Zone, where the Fitzrovia West neighbourhood area is situated.

Officers welcome at paragraph 5.14 the FWNP's intention to protect existing residential uses in order to support the provision of new social and affordable housing. Policy PR2c is particularly welcome which promotes 'tenure blind' development and reflects ItP London Plan Policy D5 regarding inclusive design and paragraph 3.6.6 which sets out that housing developments should be designed to maximise tenure integration and affordable housing units should have the same external appearance as private housing.

Officers support the FWNP's intention in Policy PR2b to limit the amount of single aspect dwellings as a result of development proposals. This is consistent with ItP London Plan Policy D6C and it should be noted that it is the London Plan's intention to limit single aspect dwellings only where proposals meet design solutions aligned with the requirements set out in Policy D3B of the ItP London Plan.

Tall buildings

Guidance for the design of tall buildings and the correct approach for the optimisation of development are set out in ItP London Plan Policy D9 and should be followed in the FWNP. 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.

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 D9 of the draft new London Plan and could be referenced in the neighbourhood plan. Those locations considered most suitable within the neighbourhood area for tall buildings should be identified on maps setting out appropriate building heights based on local evidence and in accordance with ItP London Plan Policy. It should be made explicitly clear that tall buildings should not affect the strategic views identified in Figure 2 of the FWNP.

Culture and the Central Activities Zone

While the aspirations of the FWNP to include the provision of on-site affordable housing is welcome it should recognise and understand the nature of the CAZ and the London Plan Policy SD4 which supports this strategic designation that is to serve its many predominant

functions. Officers consider that overall the FWNP balances both priorities well. The FWNP recognises the significance of its location in the CAZ including its importance as national and international office location, its extremely rich and important heritage and the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions.

Draft Policy PR3 would benefit from the inclusion of a reference to the Mayor's Agent of Change principle which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This is set out in ItP London Plan Policy D13 and should be referenced in draft Policy PR3.

Economy

Draft Policy B1 which seeks to protect and promote small business units is reflective of the approach set out in the ItP London Plan Policy E2 and this is welcome. The draft FWNP policy sets a threshold of 1,000 sqm above which office developments should provide appropriately sized units for small and medium sized enterprises. This approach is applauded but it is not clear how this threshold has been established. In the absence of local evidence to support this threshold, Draft Policy B1 should be amended to include the threshold set out in Policy B2D of the ItP London Plan which is set at 2,500sqm (gross external area).

Green infrastructure and air quality

Officers welcome draft Policy GS1 which seeks to protect and enhance green and open spaces and draft Policy GS2 which seeks to create new green spaces including living roofs and walls both of which are welcome and are reflective of ItP London Plan Policy G4.

It is one of the Mayor's priorities that air quality in London is improved so that it is the best of any major world city as set out in paragraph 9.1.2 of the ItP London Plan and Policy SI1 which addresses improving the capital's air quality. Officers are pleased that the forum is also committed to improving air quality and reducing carbon emissions through the use of renewables and the promotion of active travel through walking, cycling and public transport. Policy SI2 of the ItP London Plan promotes the energy hierarchy and aims to reduce greenhouse gas emissions and the FWNP could make reference to it as part of any future amendments.

Transport

Officers welcome that draft Policy PR2 part g sets a clear requirement that off street parking should not be provided apart from disabled persons car parking. However, it would be helpful to go further and state that occupants of new housing would have no right to apply for a residents parking permit which would be consistent with transport and parking policies in the ItP London Plan.

Regards

Hassan Ahmed
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London Plan Team
Development Enterprise and Environment



[\[1\] https://www.london.gov.uk/sites/default/files/intend_to_publish_-_tracked.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_tracked.pdf)

NHS health information and advice about coronavirus can be found at [nhs.uk/coronavirus](https://www.nhs.uk/coronavirus)

The Mayor and the GLA stand against racism. Black Lives Matter.

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