

Dear Westminster neighbourhood planning team

I am writing on behalf of 'Clean Air in London' (CAL) in response to the consultation on the Soho Neighbourhood Plan (SNP or the Plan). More about CAL here:

<https://cleanair.london/about/>

CAL congratulates the Soho Neighbourhood Forum (SNF) on 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, SNF and the Examiner's attention to the need for the SNP 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 supports emphatically the direction and intent of Policy 20 (Improving Air Quality), Policy 21 (Reducing Energy) and Policy 22 (Refurbishment and Retrofitting of Existing Buildings). However, we urge the SNF and Westminster to tighten these three policies further so that the end point of zero air emissions will be achieved throughout the Soho Neighbourhood Area by the end of the Plan's life (which we assume is 2035 or 2040).

This could be done by amending:

Policy 20: Improving Air Quality

Design proposals must maximise measures which contribute to improving ambient and indoor air quality ~~by measures~~ such as: green infrastructure; construction and deconstruction; delivery and servicing plans; and methods of on-site renewable energy generation which seek to achieve zero air emissions. ~~emit less pollutants and reduce reliance on the use of fossil fuels.~~

Policy 21: Reducing Energy

All development proposals ~~must~~ should incorporate measures designed to minimise and conserve heat and energy use, urban heat island effects and reduce combustion carbon emissions and avoid features such as doorless entrances and external heating which lead to energy waste.

Policy 22: Refurbishment and Retrofitting of Existing Buildings

All Major and Medium development must demonstrate that it has evaluated the potential of options to retrofit and improve the sustainability of existing buildings at the design stage before considering redevelopment. Retrofitting measures to any existing buildings which requires planning permissions will normally be strongly supported. Where retrofitting involves adaptations to heritage assets, these may be supported where the impacts have been carefully considered and justified and adverse impacts minimised and which do not cause significant harm.

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

CAL considers that there is no need for Soho 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.

I would like to be notified of the council's final decision in relation to the Plan.

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted contact information]

Our **Clean Air in Cities** App reports the health impact of long-term exposure to dangerous airborne particles (PM_{2.5}) 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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