

From: [Simon Birkett](#)
To: [Neighbourhood, Planning: WCC](#)
Cc: [Nicholas Bailey](#); [Yoram Blumann](#)
Subject: KNF - Regulation 16 consultation on Fitzrovia West Neighbourhood Plan
Date: 18 July 2020 17:02:59

Dear Westminster Neighbourhood Planning Team

Please acknowledge receipt.

I am writing on behalf of the Knightsbridge Neighbourhood Forum (KNF) in response to the Regulation 16 consultation on the Fitzrovia West Neighbourhood Plan (FNP or the Plan) which closes on 4 August.

KNF congratulates the Fitzrovia West Neighbourhood Forum (FNF) on producing an outstanding neighbourhood plan. It is a thoughtful plan that addresses key issues for the neighbourhood area and sets an excellent framework for the future. We strongly support the direction of travel of the proposed plan and policies and urge FNF and Westminster City Council (WCC) to be more ambitious still e.g. using 'must' and 'should' rather than 'encourage' and 'support' in planning policies relating to all climate change, energy, environmental, sustainability, transport and utility related matters.

For example, KNF emphatically supports:

1. 'Policy PR1 Promoting Regeneration's' references to: the highest levels of environmental sustainability; criteria pointing to the full integration of ventilation heating and air cooling plant into the fabric of new development (2c); matching or exceeding sustainability standards and not increasing urban heat island effects and keeping energy use and greenhouse gases to an absolute minimum (2f); and no adverse environmental impacts (pages 17 and 18);
2. Policies 'GS1: Protecting and Enhancing Existing Green and Open Space' and 'GS2: Creating New Green and Open Spaces' (page 35 and 36). Green roofs are probably easier to include in development than green walls. Please see the Knightsbridge Neighbourhood Plan (KNP's) policies KBR33 'Utilities' and KBR39 'Sustainable water' which may suggest ways to strengthen your policies;
3. Policies 'EN1: Promoting Improved Environmental Sustainability and Air Quality' and 'EN2: Renewable energy' (page 43); and
4. Policies 'T1: Pedestrian Movement and Sustainable Transport' and 'T2: Improving the distribution and delivery of goods to local businesses' (pages 46, 47 and 48).

For example, KNF considers that the FNP should point more explicitly to the need to achieve zero air emissions from buildings and related sources as soon as possible. This will only be done if all development and refurbishment requiring planning permission is addressed by the Plan. Please see the KNP's glossary for definitions.

KNF suggests that the 'life' of the neighbourhood plan is extended to 2040. This should require no further evidence or work.

FNF, you and the Examiner may also find the KNP helpful in suggesting ways to tweak policies in the FNP to address any comments raised by us or others e.g. Urban greening, Trees etc:

https://www.knightsbridgeforum.org/media/documents/knp_made_version_december_2018_131218_website.pdf

We encourage you to look closely at the KNP's approach to providing pedestrian routes which require certain legal protections (see Policy KBR28).

We encourage you to consider fully the FNP in the context of the changes that the KNF has proposed to Westminster City Council's draft City Plan in a letter and attachment to the Inspectors dated 25 June 2020 (which we submit here as evidence to the FNP consultation) (letter and seven attachments) which can be found here under 'Examination documents':

<https://www.westminster.gov.uk/cityplan2040>

Please say if you would like us to submit the pdf's as attachments an email rather than via the above link.

Among the most important comments submitted to the City Plan Examination and here are the need for the FNP to take proper account of the London Environment Strategy (2018) e.g. in relation to climate change and trees.

The changes that the KNF has propose to the draft City Plan should be taken further in the FNP e.g. on environmental and climate change related matters including air, greening, drainage and waste matters.

Please notify us of the Council's final decision in relation to the FNP. Meanwhile, well done to FNF and good luck to them and you on bringing the plan to a positive conclusion.

Please contact me if you have any questions.

Best.

Simon

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Chair
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