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Our ref PL00596160

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16 June 2020

Dear Neighbourhood Planning Team

Consultation in respect of the Draft Neighbourhood Development Plan for Fitzrovia West (Fitzwest), City of Westminster (Regulation 16)

Thank you for the opportunity to comment on the above Reg 16 Draft Neighbourhood Development Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of local planning.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed neighbourhood plan for heritage assets. Accordingly, we have reviewed the document against the *National Planning Policy Framework* (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.

Having reviewed the draft document we can offer the following observations and suggestions.



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General comments

Historic England reviewed the plan at previous draft stage and we are pleased to note the addition of Objective 2 which seeks to secure development preserves or enhances architectural and historic character and local distinctiveness.

In respect of the submitted Draft Plan we would consider that the policies are in basic conformity to the NPPF and heritage policies, and are overall likely to result in beneficial outcomes. The Plan is relatively concise and clearly focused reflecting the existing policy frameworks which are already applied to much of the area, including the Central Activity Zone, Draft London Plan and London View Management Framework, alongside 5 conservation areas. The Plan clearly aims to promote a healthy, attractive and vibrant cultural and business environment which will benefit local communities and seeks to ensure development delivers affordable homes and addresses the highlighted lack of green open space (both public and private).

The policies are in general well set out. We do however consider that Policy PR1 (2a) would benefit from clarification. This policy states that applications for the refurbishment of all unlisted buildings of merit will be supported where they meet the following criteria;

Where, on the basis of a balanced judgment, the loss of a building in this category is deemed to result in significant harm to the local area, the original uses (or nearest equivalent) and architectural features should be preserved or reinstated.

As Policy 2 refers to refurbishment the reference to loss is unclear as this would imply total demolition. We assume the intended policy position is that where demolition/loss of a non-designated heritage asset, or identified building of merit, is justified by the wider public benefits of redevelopment (when judged against the criteria in the NPPF) and where its use and/or architectural features make a positive contribution to local character, consideration must be given to preserving that use in any new development and/or reinstating those architectural elements/features which contribute positively to local architectural character. This could presumably be applied to façade retention or reinstatement of a specific element such as a shop-front of merit. If this is the intention then clarification and examples could be set out in the justification section.

Clearly the emphasis placed on sustainable transport and healthy communities in the Draft London Plan will have even greater relevance following the current Covid-19 emergency and the neighbourhood is well placed to encourage a greater shift to sustainable transport modes and pedestrian friendly public realm. We would therefore encourage the Neighbourhood to work with businesses partners and partners to seek opportunities to enhance the public realm and Fitrovia's unique and vibrant history.



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If you wish to discuss any of the above observations please do not hesitate to contact me.

Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the document which may have adverse effects on the historic environment.



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