

# Fitzrovia West Neighbourhood Plan

2020-2035

April 2020

Below are the representations of Derwent London on the draft Fitzrovia West Neighbourhood Plan. Should there be a public hearing in regard to this Neighbourhood Plan Derwent London would like to have the opportunity of taking part.

Derwent London also wishes to be informed of the final decision of Westminster City Council in relation to the Plan.

In general, a good deal of the information and policy contained in the Plan is supported by Derwent London which owns several properties in the south of the area.

We do however have some comments.

1. Policy PR1 promotes the highest quality of design, environmental sustainability and positive contribution to public realm. Derwent is committed to the promotion of these ideals. However, paragraph 2a (page 17) in dealing with unlisted buildings of merit speaks of maintaining of uses on a refurbishment/development. Sometimes a change of use can be important and this paragraph is over prescriptive.
2. In Policy PR2 b (page 20) it should be recognised that it is not always possible for all new housing to have access to outside space given the highly built up area in this neighbourhood.
3. Policy B1 (page 30) deals with small business units. It provides support for redevelopment of existing buildings which include business units of less than 250 sq m where the redevelopment involves provision of an equivalent number of such units. Further any developments for B1 use in excess of 1,000 sq m shall include at least one unit of less than 250 sq m per each 1,000 sq m. It is felt this is too prescriptive. At Derwent we design our buildings to be capable of use by a large user or be able to split into multi tenancies. Policy B1 is too restrictive.
4. Policy B2 (page 31) ought to be revisited in the light of the newly released Statutory Instrument which alters the Use Classes Order to incorporate several uses into one new class E as well as other use alterations.
5. Policy GS2 (page 36) provides that all new major development should incorporate new open or green space. Given that major development is all development of 1,000 sq m or more this might again not always be possible in such a heavily developed area even though the policy refers to living walls and roofs. Sometimes those features can produce a worse looking design.
6. Policy EN1 (page 43) says that all applications should demonstrate and make a positive contribution towards improving ambient air quality. Derwent support the intention here but the wording should be considered as it suggests it will apply e.g. to a shop front application and other small matters which cannot be intended.