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Report on Fitzrovia West Neighbourhood Plan 2020-2040

An Examination undertaken for Westminster City Council with the support of the Fitzrovia West Neighbourhood Forum on the April 2020 submission version of the Plan.

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Main Findings - Executive Summary

From my examination of the Fitzrovia West Neighbourhood Plan (the Plan/ FWNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Fitzrovia West Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – Fitzrovia West as illustrated on Figure 1 of the Plan;
- The Plan, with modification to the front cover¹, will specify the period to which it is to take effect – 2020 to 2040; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendums on the basis that it has met all the relevant legal requirements.

I have considered whether the referendums' area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Fitzrovia West Neighbourhood Plan

1.1 Fitzrovia West, bounded by Oxford Street, Great Portland Street and Cleveland Street, is the part of Fitzrovia which lies within the City of Westminster. Historically, attracting artists, writers, non-conformists, political activists and the avant-garde, the area developed a bohemian character. In the past, its diverse community and the availability of low-cost housing, workshops and commercial units were attractive features. The western section of the area was first developed by the Cavendish-Harley estate in the eighteenth century. Over time, land ownership and usage were fragmented and the neighbourhood now has a rich and diverse architectural heritage. Industries established in the past, such as furniture and clothing making, and car showrooms, have been replaced by companies associated with business services, the media, advertising, television and radio, architecture and engineering, design, IT and catering. Corporate headquarters for Estee Lauder and Facebook, and buildings of the University of Westminster, are also present in Fitzrovia West.

¹ See paragraph 3.3 below (and PM1 in Appendix 1).

- 1.2 The area has a distinctive character partly because of its location in the West End of London, and partly because of its architectural heritage with the grid layout of Georgian Streets, notably on the Cavendish-Harley estate. Five conservation areas and more than 60 listed buildings demonstrate the high quality and character of the built environment in Fitzrovia West. The population of the area is estimated at just under 4,000, living in about 1,900 households. House prices are described as “exceptionally high even by London standards”. Car ownership is very low with only 27% of households owning a motor vehicle, reflecting the high level of accessibility on foot and by public transport to jobs and services in the area. Fitzrovia West is located within the London Central Activities Zone (CAZ), and the southern portion of Fitzrovia West between Mortimer Street and Oxford Street forms part of the West End Retail and Leisure Special Policy Area. The south-east corner of the Fitzrovia West Neighbourhood Plan Area includes part of the designated Tottenham Court Road Opportunity Area, as shown in Figure 3. Works on a new rail line, the Elizabeth Line, are underway along Oxford Street close to Tottenham Court Road.
- 1.3 Between January 2013 and February 2015, a number of residents and local businesses met regularly to discuss the potential for setting up a neighbourhood forum and preparing a neighbourhood plan. Fitzrovia West Neighbourhood Forum was confirmed by Westminster City Council (WCC) as the qualifying body for the designated area of Fitzrovia West in February 2015, with membership of some 200 businesses and residents. It includes an Executive Committee of 12 people, at least 5 of whom work for businesses based at home or in the area. Extensive consultation with residents and businesses has been carried out over the years through public meetings, exhibitions and social media to identify issues of local importance, to produce a Plan vision and objectives, leading to the current submission Plan with its policies for the future of the neighbourhood.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the FWNP by WCC, with the agreement of the Fitzrovia West Neighbourhood Forum (FWNF).
- 1.5 I am a chartered town planner and former government Planning Inspector, with prior experience examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.6 As the independent examiner I am required to produce this report and recommend either:

(a) that the neighbourhood plan is submitted to referendums² without changes; or

(b) that modifications are made and that the modified neighbourhood plan is submitted to referendums; or

(c) that the neighbourhood plan does not proceed to referendums on the basis that it does not meet the necessary legal requirements.

1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:

- Whether the plan meets the Basic Conditions.
- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendums' boundary should be extended beyond the designated area, should the plan proceed to referendums.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

² In accordance with paragraphs 12(4) and 15 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the draft Plan relates to a neighbourhood area that has been designated as a business area under section 61H of the 1990 Act. The combined effect of these provisions is that an additional business referendum is required.

The Basic Conditions

1.9 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law)³; and
- Meet prescribed conditions and comply with prescribed matters.

1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.⁴

2. Approach to the Examination

Planning Policy Context

2.1 The Development Plan for this part of the City of Westminster, not including documents relating to excluded minerals and waste development, is the London Plan, adopted in 2016, and the Westminster City Plan, adopted in 2016, with some saved policies from the Westminster Unitary Development Plan, 2007. A new draft London Plan has been through examination in public, and the Mayor produced an Intend to Publish version in December 2019 as a framework for development over the next 20 years. Following directions from the Secretary of State on 13 March 2020 and 10 December 2020, a modified version titled the 'Publication London Plan (December 2020)' was published by the Mayor on 21 December 2020. The Secretary of State has now confirmed that the Mayor can adopt the London Plan in his letter of

³ The existing body of environmental regulation is retained in UK law.

⁴ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

29 January 2021.⁵ A new Westminster City Plan, 2019-2040, is currently undergoing examination, with hearing sessions having taken place in September and October 2020. Both the new draft London Plan and the new emerging Westminster City Plan have reached advanced stages in the process of preparation, and I have had regard to the advice in the Planning Practice Guidance (PPG) concerning the relationship between a neighbourhood plan and an emerging local plan⁶ in examining the FWNP.

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Government's PPG offers guidance on how national policy should be implemented. A revised NPPF was published on 19 February 2019, and all references in this report are to the February 2019 NPPF and its accompanying PPG.

Submitted Documents

2.3 I have taken account of all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:

- the draft FWNP 2020 to 2035⁷, April 2020;
- Figure 1 on Page 6 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
- the Consultation Statement, May 2020;
- the Basic Conditions Statement, April 2020;
- all the representations that have been made in accordance with the Regulation 16 consultation;
- the Strategic Environmental Assessment (SEA) Screening Report and Habitats Regulations Assessment (HRA) Screening Report prepared by WCC, January 2020;
- the request for additional clarification sought in my letter of 11 September 2020 and the response dated 25 September 2020 from FWNF; and
- a Statement of Common Ground (SOCG) between WCC and FWNF, produced in December 2020 in response to the request in my letter of 11 September 2020.⁸

Site Visit

2.4 I made an unaccompanied site visit to the FWNP Area on 22nd September 2020 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

⁵ View at:

https://www.london.gov.uk/sites/default/files/letter_from_sos_mhclg_london_plan_29_jan_21.pdf

⁶ PPG Reference ID: 41-009-20190509.

⁷ See footnote 1.

⁸ View the documents at: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/city-plan-neighbourhood-planning-and-planning-policy/fitzrovia-west-neighbourhood-plan>. The December 2020 SOCG also forms Appendix 2 of this report.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I noted the willingness expressed by some respondents to the Regulation 16 consultation exercise to take part in relevant public hearings. However, I considered hearing sessions to be unnecessary as the submitted documents, including the responses from the Regulation 16 consultation exercise and the SOCG, provided a clear picture of potential objections to the Plan, and guided my consideration of the arguments for and against the Plan's suitability to proceed to referendums.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in Appendix 1. The PMs cross refer extensively to the SOCG between WCC and the FWNF (December 2020), which I have therefore attached as Appendix 2 to my report.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The FWNF has been prepared and submitted for examination by the Fitzrovia West Neighbourhood Forum. WCC designated the Neighbourhood Plan Area on 28 March 2014 and the Forum on 5 February 2015. On 11 November 2019, an application was made to WCC in order to extend the designation of the Forum for a further five years. The renewal of designation was confirmed on 20 February 2020.
- 3.2 It is the only Neighbourhood Plan for Fitzrovia West and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan as submitted does not specify clearly the period to which it is to take effect. The front cover of the Plan and paragraph 1.2 give a time period of 2020 to 2035, whereas Appendix 3 refers to 2020 to 2040. In response to my letter to the Forum, in September 2020, it was confirmed that the Plan should cover the 20 year time period from 2020 to 2040. Proposed modification **PM1** should be made, so that the front cover and paragraph 1.2 make this clear, and so that the Plan meets the procedural requirements for neighbourhood planning.

Neighbourhood Plan Preparation and Consultation

- 3.4 The FWNF was confirmed as the qualifying body for the area, with a written constitution for a business neighbourhood⁹, in February 2015. Membership of the Forum includes at least 200 businesses, residents and others who live and work from home. It holds regular meetings and consultations using its website, and its Executive Committee has 12 members. The University of Westminster, which has a major presence in the area, has a seat on the executive committee, as does the New West End Company which represents many businesses in the southern part of the designated area. As reported in the Consultation Statement, the Forum has sought to engage and consult both residents and businesses as extensively as possible in drawing up the FWNP.
- 3.5 The strategy for consultation has been to use a wide variety of media, both to publicise activities and seek comments and suggestions. At least one public meeting has been held each year since the Forum's inception, to keep members informed of Plan progress. The local community newspaper, Fitzrovia News, has publicised all key consultation stages. Regular e-mails, blogs and other forms of social media have been used to publicise the existence of the Forum and to consult on priorities for the Plan.
- 3.6 The first public meeting of the Forum took place on 14 April 2015 at the University of Westminster, and those attending were invited to report back on issues of local concern. An exhibition of issues and proposals followed at the annual general meeting, held at the Getty Images Gallery, in January 2016. Approximately 50 people attended and left comments after viewing the display boards on seven identified issues. A first draft of the FWNP was produced in 2017 and submitted to WCC for comment from its officers. The Forum's annual general meetings in 2018 and 2019 enabled further engagement with the local community. 44 people attended the 2019 meeting to which all residents and businesses were invited by way of a blog and hand-delivered flyers.
- 3.7 Consultation in accordance with Regulation 14 of the 2012 Regulations was carried out between 1 July and 13 August 2019 and included all statutory agencies. Appendix 8 of the Consultation Statement indicates that 34 responses were received and considered by the Forum. A number of changes were consequently made to the draft Neighbourhood Plan as highlighted in Table 2 of the Consultation Statement. The revised Plan, submitted for examination in April 2020, was consulted on in accordance with Regulation 16, between 26 May and 4 August 2020, and it elicited 34 responses. I have taken account of these representations in my

⁹ [Constitution | FitzWest](#)

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examination of the Plan. Overall, I am satisfied that the consultation process has met the legal requirements i.e. procedural compliance and has had regard to the advice in the PPG on plan preparation.

Development and Use of Land and Excluded Development

- 3.8 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act. The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.9 FWNF, in its response to my letter of September 2020, confirmed that the Plan had been prepared with consideration given to Human Rights (within the meaning of the Human Rights Act 1998). WCC submitted a detailed response to the FWNP as part of the Regulation 16 consultation exercise, outlining areas of agreement and disagreement with the Plan's contents. The Council also contributed to the Statement of Common Ground with the Forum in December 2020, in response to questions from me in September 2020. Neither WCC nor any other party alleged that the Plan would breach human rights, and from my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The FWNP was screened for SEA by WCC, which found that the Plan was unlikely to have significant environmental effects. It was therefore considered unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Report, January 2020, I support the SEA conclusion.
- 4.2 The FWNP was also screened for HRA and WCC concluded that further stages of Appropriate Assessment were not required. Fitzrovia West is not in close proximity to a European designated nature site. Having read the WCC's HRA Screening Report, January 2020, and its Annex 1, which contains supportive consultation responses from Historic England, Natural England and the Environment Agency, I agree with the results of the screening assessment.

Main Issues

- 4.3 I have read the submitted FWNP, the consultation responses, the Forum's responses to my preliminary questions (including the Statement of Common Ground with WCC, made in December 2020), as well as all other background evidence, and I have undertaken the site visit. Based on all the evidence, I have assessed the compliance of the Plan as two main matters. These are:

- General issues of compliance of the Plan, as a whole; and
- Specific issues of compliance of the Plan policies.

Compliance of the Plan as a Whole

- 4.4 The submitted FWNP is a concise document of 59 pages, including six appendices. The Introduction, in section 1, explains how the process of plan preparation began, what is the strategic context for the Plan (in terms of the London Plan, Westminster City Plan and NPPF), and how public consultation has been important to the production of the FWNP. Sections 1 and 2, which describe the neighbourhood, its history, heritage and present community, provide a helpful and engaging start for readers. Section 3 moves on to consider the planning context in Fitzrovia West. All Fitzrovia West is located within the London CAZ, and the Forum accepted that paragraph 3.1 should be modified to make this clear. **PM2** should be made so that the FWNP reflects the wider strategic planning context.
- 4.5 The Plan goes on to inform that there is continuous pressure for development, notably for refurbishment or redevelopment to provide high-value residential accommodation or large office units. The increase in recent years in international tourism has fostered increased demand for hotel accommodation, as well as larger retail units and the conversion of small shops to restaurants or cafes. Introduction of the Elizabeth Line, currently underway, is expected to increase passenger numbers at Bond Street and Tottenham Court Road stations significantly. Poor air quality and increased transport movements, as well as a shortage of affordable housing, are identified as major concerns for the wider Fitzrovia West area.
- 4.6 A response to the Regulation 16 response stated that Covid-19 represented a rare opportunity to open a window on new possibilities for the area. These could include more small scale projects to build a diverse and attractive neighbourhood, to restrict through traffic more, create a cycle sensitive environment with better cycle parking and storage provision, add more pop-up flower gardens and small green areas. Clearly, this represents just one vision for the area. However, the SOCG between the Forum and WCC proposed a new paragraph 3.5 to refer to the likely impact of the Covid-19 pandemic on retail and hospitality uses, with reduced numbers of tourists and commuters in Fitzrovia West. It predicts that a large amount of commercial floorspace may remain vacant for some time. I have no reason to disagree with this position and recognise that the pandemic will have hitherto unforeseen effects on the economy and built environment. It would be helpful if the proposed new paragraph 3.5 acknowledged this situation. **PM3**, to add a new paragraph 3.5 about the likely future effects of Covid-19, should be made to contribute to the achievement of sustainable development.
- 4.7 The existing paragraph 3.5 (to be renumbered) explains that section 4 sets out a vision for the Plan and five objectives, each of which will be

examined in detail in sections 5-9 inclusive. This, in my opinion, provides a useful early summary of the main issues which the Plan seeks to address by way of its policies. In section 3, it is helpfully stated that the Plan has sought to avoid repeating relevant policies in the London Plan and WCC Development Plan. It has also set priorities and defined the issues which emerged as important at public meetings. I consider that this is a good approach to plan preparation and reflects the Basic Conditions for neighbourhood planning.

- 4.8 The vision, in section 4, “*aims to ensure that Fitzrovia West develops as a habitable, sustainable and neighbourly community in which to live and work through all means available, including planning, collaborative working and community enterprise*”. This leads to a series of objectives under the following headings:
- Promoting regeneration
 - Supporting business uses and development
 - Protecting and increasing green and open space
 - Promoting environmental quality, and
 - Mobility and transport.

I consider that these sub-headings cover all the key issues raised through public consultation and in background evidence. I note the suggestion in a consultation response that the fourth objective on Mobility and Transport should be amended to balance the amenity standards of residents and businesses with the strategic benefits of development schemes. However, having regard for paragraph 182 of the NPPF, I see no need to modify the existing objective. WCC stated that the objectives align with those of the emerging City Plan. My site visit also confirmed their suitability for future planning in Fitzrovia West. Sections 5-9 contain policies under each objective heading, and I comment on those below. I note that all policies are supported by cross-references to their strategic policy context, and text to justify them.

- 4.9 Appendices 1 and 2 identify Grade I and Grade II* listed buildings, as well as an Archaeological Priority Area, and unlisted buildings of merit in the five conservation areas in Fitzrovia West. Appendix 3 covers Monitoring and Reviewing the Plan, recognising that revisions and updates will be required over the Plan period, and committing the Forum to monitoring and managing implementation. Appendix 4 addresses the Use of Community Infrastructure Levy Funds and Non-Planning Projects, which could help implementation of the FWNP vision. Appendix 5 provides a list of key sources of information and policy guides, and Appendix 6 includes a glossary of technical terms. The Appendices, in my view, should assist all readers and users of the FWNP. The maps, figures and Table 1 help to illustrate policies and text throughout the Plan. Overall, on the first main issue, providing that **PMs 2 & 3** are made, I am satisfied that the Plan will be suitably succinct with a clear and logical structure, which generally complies with the Basic Conditions for neighbourhood planning.

Specific Issues of Compliance of the Plan’s Policies

4.10 Table 3 of the SOCG refers to the Strategic Policy Context, relevant components of which are summarised under each policy in the Plan. I consider these references to be helpful, especially as both the adopted London Plan and Westminster City Council Plan, and their emerging plans, are all applicable in Fitzrovia West. I agree that the contextual information should be updated, to refer to the most recent version of emerging plans (notably “WCC City Plan post-examination draft, 2020”), and to re-number the strategic policies in accordance with the Publication version of the London Plan. Paragraph numbers for the supporting text in the FWNP may also need to be amended in line with the proposed modifications, and I am content for these to be changed by the Forum. The SOCG includes suggested modification of the numbering system used within policies. For example, Policy PR1, in the submitted Plan, included criteria 1, 2 (a-c), 3 (a-g), whereas the modified policy in the SOCG contains 1, 2, 3, 4, 5(i-xi). I have not set out specific modifications for each policy to show the updated Strategic Policy Context or new numbering systems. However, I support the updates and am content for them to be made before the Plan proceeds to referendums, to assist future readers and users of the FWNP.

Promoting Regeneration

- 4.11 Policy PR1: Promoting Regeneration addresses the redevelopment or extension of existing buildings, and a number of comments proposing modifications to it were made in Regulation 16 consultation responses. I consider that the proposed changes to the policy, put forward in the SOCG, to refer to “refurbishment” as well as redevelopment or extension, and to provide more detail about development affecting unlisted buildings of merit, should meet Historic England’s concerns. The proposed changes also clarify the importance of preserving or enhancing the settings of listed buildings and adds a reference to Conservation Area Audits. These modifications are necessary so that Policy PR1 has regard for national policy to conserve the historic environment. The SOCG also proposes to delete the reference to “ventilation shafts” and insert “ducting, air filtration” in 2c. of the policy. This modification was proposed by Clean Air in London, and I support it to contribute to the achievement of sustainable development. Clean Air in London also suggested that 3f. should refer to “worsening air quality”, and the Forum indicated its support for this modification, in its response to my preliminary question in September 2020. Although not included in the SOCG’s proposed modifications to Policy PR1, I consider that “worsening air quality” should be referenced in clause 5vii. Also, a new clause, 5v, requiring developments of 500sqm or more to achieve BREEAM “excellent”, or equivalent standards, should be included in Policy PR1. I am satisfied that these modifications should enable the policy to contribute to the achievement of sustainable development.
- 4.12 A number of respondents to the Regulation 16 consultation exercise criticised Policy PR1 for being too restrictive towards new development

and redevelopment projects. Clause 2a. regarding unlisted buildings of merit expects original uses to be preserved or reinstated, but in some instances, it was argued, a change of use would be beneficial. The desirability of sustaining and enhancing heritage assets, it was contended, needs to be taken into consideration alongside the desirability of new development which can make a positive contribution to local character and distinctiveness. Clause 2b. of Policy PR1 aims to restrict the addition of new storeys or Mansard roofs, unless there is a "precedent" in adjacent buildings. This was perceived as likely to prevent the effective use of land within Fitzrovia for additional commercial or residential development. It was suggested that such proposals should be assessed on a case-by-case basis.

- 4.13 Clause 3d. expects all approved housing tenures to be provided on site, but experienced developers argued that including affordable housing on site within developments could render schemes unviable. It was pointed out that a payment in lieu principle had been accepted in recent developments in the area. Clause 3g. was also criticised for being too restrictive because it requires no loss of daylight or sunlight to adjoining occupants, and no increase in ambient noise levels. There is conflict with BRE (Building Research Establishment) guidance which acknowledges that schemes may have an impact on the sunlight or daylight of neighbours but indicates at what level an impact becomes unacceptable. WCC expressed its broad support for the aims of the proposed urban design and conservation policy (Policy PR1) but advised that "the wording and arrangement are not clear and appear(s) incomplete". In addition, WCC indicated that some parts of the policy were already covered by the emerging City Plan and need not be repeated; others, it was alleged, were not in conformity with it (notably clause 3g. - no loss of sunlight or daylight).
- 4.14 Table 3 of the SOCG includes modifications to Policy PR1 to clarify the approach to proposals for tall buildings, with a reference to the Glossary which it is proposed to refresh, with a definition taken from the emerging Westminster City Plan. Modified clause 5iii. allows for more flexibility over the demolition and replacement of buildings. Clause 5iv retains the aim for affordable housing to be provided on development sites but allows for off-site provision in exceptional circumstances, as long as it is located within Fitzrovia West. I consider that this modification should meet the Forum's ambition to maintain a mix of housing tenures and provide for those unable to afford market housing. A proposed new criterion xi confirms that courtyards, passageways and mews should be protected, as they contribute to the historic character of the area. I support these modifications which have regard for national policy and should contribute to the achievement of sustainable development. All the modifications to Policy PR1 in Table 3, in my opinion, address the concerns raised in the Regulation 16 consultation responses and should result in a less restrictive policy which has regard for national planning policy, guiding development towards sustainable solutions (paragraph 9 of the NPPF), and should align with the draft London Plan and emerging Westminster City Plan. **PM4**

should be made accordingly, to modify Policy PR1 Promoting Regeneration and to update the Glossary in Appendix 6 on Tall Buildings.

- 4.15 The supporting text in paragraphs 5.10 to 5.14 states that the Plan area has always had a vibrant and mixed community of residents living in a variety of tenures. There is a continuing need for affordable housing, as the average 10 year waiting period for a 2-bed flat in Westminster indicates, and a desire to maintain the provision of housing for permanent residents. The risks to the local community from the growth of “buy to rent” accommodation and short-term letting, as well as new developments with a high proportion of expensive apartments, often left vacant for long periods, are explained. Policy PR2 seeks to protect existing dwellings from changes of use and to encourage new housing development, especially affordable housing. The Mayor of London expressed support for Policy PR2b. to limit the amount of single aspect dwellings, but advised that this should only be undertaken where design solutions aligned with the requirements of Policy D3B of the Intend to Publish London Plan. Transport for London (TfL) welcomed and supported Policy PR2g. which states that off-street car parking should not be provided except for disabled persons as set out in higher tier plans. However, it requested that the policy could go further, in line with the emerging Soho Neighbourhood Plan, to exclude residents of new development from eligibility for residents’ parking permits.
- 4.16 For the Berners-Allsopp Estate and Shaftesbury PLC, it was argued that Policy PR2f. goes beyond the adopted London Plan and National Space Standards in seeking refuse storage and related facilities’ space. It was also claimed that it would be too restrictive to ensure that all newly constructed housing was occupied as a “principal residence” (Policy PR2h.), and difficult for WCC to monitor and enforce. WCC agreed with this point. On Policy PR2j., it was pointed out that Building for Life 12 has been superseded by the London Plan and National Space Standards, so that it would be onerous for developers to have to follow additional design guidance.
- 4.17 The SOCG’s Table 3 includes a modified Policy PR2 which softens the line on “single aspect housing” and clarifies that new development should not provide new car parking except for disabled persons. It deletes the reference to occupancy as a “principal residence” in the policy, along with paragraph 5.21. I consider that these modifications address the points of concern raised and should be made so that the Plan contributes to the achievement of sustainable development. Additional modifications to clarify the amount of affordable housing that will be sought on major development schemes, and to deter gated forms of housing development should be made to align with the emerging Westminster City Plan. The SOCG highlights the differing opinions on clause 2f. regarding the provision of refuse storage and other related facilities. Modified wording is included in Policy PR2 vi. and I consider that this allows for more flexibility, especially as it raises the threshold for “additional community meeting and/or storage space” to 10 dwellings. However, as Policy 38 in

the emerging City Plan already sets requirements for waste facilities, and paragraph 18.4 addresses new community infrastructure, I consider that clause vi (f. in the submitted FWNP) should be deleted. I therefore recommend that Policy PR2 and the supporting text is modified as set out in the SOCG (without the modified clause vi) and as shown in **PM5**, so that the Basic Conditions for neighbourhood planning are met.

- 4.18 Policy PR3: Tourism, Arts, Culture and Entertainment Uses supports growth in this sector, but also wishes to protect the residential areas from late-night noise, excess refuse, traffic congestion and other nuisance. WCC commented that no explanation was given as to why the 500sqm threshold, referenced in clause 1, should prevail. Clause 2 was seen as more restrictive than the emerging City Plan in seeking to protect A1 uses. Clause 3 was perceived as ambiguous, and not needed because Policies 7 and 34 of the emerging City Plan would provide appropriate protection against harm from "tourism and entertainment uses". Regarding clause 5, WCC suggested that a cross-reference should be added to its two metre "pedestrian clean zone" approach and the matter of "A" boards be moved to the supporting text, to distinguish advertisement control from planning permissions. Although WCC commented that clause 4 was unnecessary because the "Agent of Change" principle is covered by Policy D13 of the emerging (Intend to Publish) London Plan, the Mayor of London was clear that Policy PR3 would benefit from its inclusion. It places responsibility for mitigating harmful noise and nuisance effects on the proposed development. Shaftesbury PLC commented that it could be difficult to enforce clause 5 as Covid-19 has led to more shops and restaurants using space outside, including on the public highways.
- 4.19 The SOCG includes suggested modifications to Policy PR3 which remove the reference to new tourism and entertainment uses of 500sqm or more, remove the reference to loss of A1 uses, clarify the reference to the West End Retail and Leisure Special Policy Area (WERLSPA), simplify clause 3iii so that the amenity of residents and other users is not harmed, and remove the reference to "A" boards in clause 5v. Conditions to control hours of opening and the use of external sound systems should reinforce the effectiveness of clause 5v. in my view, and I support the proposed new sentence to explain this. The modified Policy PR3 (as set out in the SOCG) with change to paragraph 5.26 (as in **PM6**) has regard for national policy, aligns with the emerging London and City Plans and should contribute to the achievement of sustainable development. I consider that **PM6** should be made.
- 4.20 Policy PR4 may address matters already covered in the emerging City Plan, but I understand that retaining and, where possible, expanding community facilities has significant value for the residents and people who work in Fitzrovia West. The SOCG puts forward modifications to (i) remove the reference to Class D use from the policy, which I support having regard for the recent Government changes to the use classes, and (ii) allow some flexibility in the provision of replacement facilities by

adding “as far as possible”. Having regard for national policy and to support sustainable development, Policy PR4 should be modified, as shown in the SOCG and in **PM7**.

Supporting Business Uses and Development

- 4.21 Section 6 of the Plan begins with a brief description of the history of commercial development in Fitzrovia West. Paragraph 6.3 advises that there are 2,056 businesses in the Plan area employing 38,740 staff, indicating the area’s economic significance. The SOCG includes changes to the wording of paragraphs 6.1 to 6.5 to (i) refer to the recent introduction to the area of digital and media companies as well as art galleries, (ii) inform readers that the statistics for businesses and staff relate to 2016, (iii) refer to the increase in vacant commercial floorspace in the area since the Covid-19 pandemic began, and (iv) remove the reference to shops from paragraph 6.5. I recommend that these modifications, as well as a reference to high street uses in objective 4.4.1, are made, as in **PM8**, to provide clarity for readers and contribute to the achievement of sustainable development.
- 4.22 Policy B1 seeks to retain an equivalent number of small units of 250sqm or less when redevelopment is proposed, and to secure at least one such small unit when development schemes of 1,000 sqm for B1 use are put forward. Shaftesbury PLC objected to this policy requirement. I appreciate that, at the time of Covid-19, small office spaces may inhibit social distancing. It was also pointed out that small businesses often need more space as they grow and prosper; those in the creative sector may prefer to have a larger space, including for collaborative working. Limits on office sizes, it was argued, may compel independent businesses to move out of the area leading to a negative effect on future prosperity. Berners-Allsopp and CBRE on behalf of British Land also objected to the policy, stating that the demand for business space in this area is for all sizes including large open plan, with potential for sub-division. As written, the policy will restrict flexibility and the desirability of the area for new developments, it was argued.
- 4.23 The Mayor of London, by contrast, welcomed the thrust of Policy B1 as it seeks to protect and promote small business units and is reflective of the emerging London Plan Policy E2. However, the London Plan sets a threshold of 2,500 sqm not 1,000sqm, above which units for small business should be included. As The Mayor observed, it is not clear how the FWNP threshold of 1,000 sqm has been established. The SOCG puts forward modifications to Policy B1, to remove the thresholds of 1,000 sqm and 250sqm, and refer only to developments in excess of 2,500 sqm. The policy would retain its original purpose to support small businesses, SMEs, start-ups and organisations occupying low-cost units. It is also proposed to modify the supporting text to give examples of flexible workspace serving micro-companies and sole practitioners in the area, and to describe use classes in line with Government’s recent changes to the Use Classes Order. I consider that Policy B1 and the supporting text should be modified, as in the SOCG and **PM9**, so that policy is reflective of the

emerging London Plan (Policy E2(D)), has regard for national planning policy and will contribute to sustainable development.

- 4.24 Policy B2 addresses Retail and Related Uses. WCC requested that the FWNP should include a reference to the Oxford Street District Place Strategy and Delivery Plan. This comprehensive strategy for the area between Marble Arch and Tottenham Court Road, to revitalise all Oxford Street, was published in February 2019.¹⁰ It is clearly relevant to Fitzrovia West, and I consider that it should be referenced in section 6, Supporting Business Uses and Development, and in Appendix 5. I have also taken account of the Mayor of London's comment that the FWNP may wish to set out how it can contribute positively towards growth in the Tottenham Court Road Opportunity Area in line with emerging Policy SD1 Part B of the London Plan. As shown in Figure 3, the Opportunity Area extends outside Fitzrovia West and I consider that policy ambitions are more appropriately addressed in the London and Westminster City Plans. Paragraph 5.25 of the WFNP and Appendix 5 alert readers to the presence of the Opportunity Area.
- 4.25 A number of respondents to the Regulation 16 consultation exercise stated that Policy B2 was too restrictive of some new retail development, and changes of use of retail premises. It is clear that Government changes to the Use Classes Order in England, which commenced on 1 September 2020, require modifications to be made to the policy to give more flexibility. The most significant change to the Order is the new class E for shops, financial and professional services, cafe/restaurant, clinics/health centres/crèches/day nurseries/day centre and gyms. With the new class E in place, many changes of use away from retail will no longer require planning permission.
- 4.26 The SOCG puts forward a replacement Policy B2: with a revised name, Street Frontages, to offer more flexibility (for example, it removes the 18 months vacancy requirement before change of use will be considered acceptable). The modified policy reflects the revised Use Classes Order. However, I note the lack of agreement between the Forum and WCC over clauses i. to provide a range of outlets which meet a variety of local and other needs, and vi. opposing the loss of retail premises to sui generis uses such as bars and hot food takeaways. I understand the importance, especially to the local resident community, of maintaining a wide range of shops and service outlets and appreciate the difficulties which can arise when key local shops are closed or replaced. However, clauses i. and vi. which seek "a range of outlets" and oppose a change of use where premises "provide a valued local service" could be difficult to assess and implement. Paragraphs 6.10 and 6.11 should, however, refer to these ambitions, as proposed in the SOCG, as well as make reference to the Oxford Street District Place Strategy and Delivery Plan.

¹⁰ A new Oxford Street District Framework has been published on 16 February 2021. View at: <https://osd.london/>

- 4.27 I accept that Policy B2 should not state that new residential and non-commercial uses may be considered appropriate in the future, on the upper floors of the West End International Centre (WEIC). Paragraphs 15.14-16 of the emerging Westminster City Plan specify that residential use of the upper floors in the WEIC is not supported. Policy B2 and the supporting text should be modified as shown in the SOCG (without the highlighted yellow changes) and as shown in **PM10**, so that regard is had for national policy and so that the policy reflects the emerging City Plan.

Green and Open Space

- 4.28 Section 7 addresses this topic and states that there are deficiencies in green and open spaces in Fitzrovia West. Although the consultation responses pointed out the area's proximity to the large open area of Regent's Park, it was clear to me at my site visit that Euston Road prevents easy access to the Park for pedestrians from Fitzrovia West. The level of open space deficiency within Fitzrovia West is adequately illustrated in Figure 5. WCC expressed support for Policy GS1 but suggested that the spaces mentioned in clause 2 of the policy should be shown on a map. The Forum proposed that Figure 8 should show the four named sites, and I recommend that the figure is modified accordingly, as in **PM11**, with a cross-reference to Figure 8 rather than Figure 3 in Policy GS1, and Figure 5 in paragraph 7.6 (as in **PM12**). The modifications are needed so that regard is had for paragraph 16d of the NPPF, which states that policies should be clearly written and unambiguous.
- 4.29 I noted the suggestion that land at the northern end of Berners Street should be shown alongside the nine Public Realm Priority Projects in Figure 8. However, the Forum advised, in its letter to me of September 2020, that that site had not been selected for detailed case study by their consultants. Figure 8 is designed to show potential rather than firm proposals, as explained in paragraph 7.6 of the FWNP. In my view, the approach would not rule out future improvements to the public realm and landscaping of Berners Street. However, Figure 8 need not be modified to add the site.
- 4.30 On Policy GS2: Creating New Green and Open Spaces, it was pointed out that in such a heavily developed area, it may not always be possible to incorporate new open or green space, even in major developments. The Swift Conservation organisation suggested that the policy should refer to measures such as swift bricks and bat boxes to increase biodiversity. The SOCG put forward revised wording to Policy GS2 which confirms that the policy would apply to "major" development proposals, and new open or green space "where possible". A reference to swift bricks and bat boxes would be added as well as a footnote reference to the Healthy Streets principles of the Mayor/TfL. The footnote to the policy, Strategic Policy Context, should also refer to WCC's Trees and the Public Realm Supplementary Planning Document (SPD). **PM12** should be made so that the policy contributes to the achievement of sustainable development.

Promoting Environmental Quality

- 4.31 The introduction to section 8 of the Plan refers to the negative environmental conditions in Fitzrovia West, the first being poor air quality. Paragraphs 8.2 and 8.3 and Figure 9 provide some useful background and statistical information, but I consider that the terminology requires some clarification. Also, paragraph 8.2 should refer to Figure 9 rather than Figure 8. The differences between NO_x and NO₂, the meaning of PM (particulate matter), and the different measures of PM_{2.5} and PM₁₀, should be briefly explained, for the benefit of readers and users of the Plan, having regard for paragraph 16d of the NPPF. **PM13**, to modify paragraph 8.2, should be made accordingly.
- 4.32 On behalf of the Mayor of London, it was stated that his priorities included improving air quality in London so that it is the best of any world city. Policy S12 of the emerging London Plan promotes the energy hierarchy and aims to reduce greenhouse gas emissions. I note that this policy is referenced in the Strategic Policy Context to Policies EN1 & 2, and that paragraph 8.5 refers to action taken by the Mayor of London and TfL, as well as WCC. Clean Air in London stated that the FWNP should be consistent with WCC's declaration of a climate emergency (with deadlines) and in conformity with the London Environment Strategy 2018. Policies EN1 and 2 should be strengthened so that zero air emissions can be achieved by 2040. It was suggested that Policy EN1 should be modified to state that all built development including substantial refurbishment should achieve net zero emissions. By contrast, Derwent London considers that the policy is too onerous, and should not be applied to small developments, eg. shop front changes.
- 4.33 The SOCG set out revised wording for Policy EN1 which is more ambitious than in the submitted FWNP, seeking to achieve net zero emissions as soon as practical. The revised wording has also focussed on major developments including substantial refurbishments. Although WCC contended that the policy did not separate the two issues of carbon emissions and air quality sufficiently, I consider that its purpose is clear. I support the modified Policy EN1 with a definition of "zero emissions" added to the Glossary in Appendix 6, as shown in the SOCG and set out in **PM14**, to contribute to the achievement of sustainable development and align with the emerging policies in the London Plan and Westminster City Plan.
- 4.34 Regarding Policy EN2, WCC was critical of clause 2, indicating that the wording did not comply with emerging City Plan Policy 37, which sets higher standards for energy efficiency. Clause 3, it was suggested, was too vague in its reference to "adverse impacts" on heritage assets, and arguably overlapped with clause 2d. The SOCG includes revised wording for this renewable energy policy which, in my opinion, should provide

clarity for all new development including substantial refurbishment, and overcome the problems identified by WCC. **PM15** should be made to modify Policy EN2 so that it contributes to the achievement of sustainable development.

Mobility and Transport

- 4.35 Section 9 supports sustainable transport, and I note that TfL welcomed the Plan's promotion of a sustainable and improved public realm which will help create a healthier and less vehicle-dominated Westminster. One local resident argued that the Plan has a limited vision for reimagining traffic flows through the area. It was suggested that through routes need to be restricted, more priority given to road narrowing schemes, with parking provision limited, and cycling given a higher profile. Historic England also observed that Fitzrovia West is well placed to encourage a greater shift to sustainable transport. TfL requested, in its Regulation 16 consultation response that (i) Crossrail 2 be included in the FWNP; (ii) the Mayor of London's Vision Zero approach to eliminating all deaths and serious injuries on the road network by 2041 be mentioned; and (iii) residents of new developments be eliminated from eligibility for residents' parking permits.
- 4.36 I consider that the proposed modifications to Policy PR2 vii: Housing Provision (PM5) should provide clarification that new residential development should not include new parking spaces. This modification should contribute to a more sustainable transport system, and address TfL's point. The Forum contends that, as Crossrail 2 will not include stations within Fitzrovia West, it is not necessary to refer to it in the Plan. I support this position but consider that the supporting text in paragraphs 9.4 and 9.5 could be expanded to refer to the Mayor's Vision Zero. The Strategic Plan context for Policies T1 and T2 should also be updated to refer to the more recent Publication London Plan (December 2020): T2 (Healthy streets), T5 (Cycling), T6.1 (Residential parking), T6.2 (Office parking), and T7 (deliveries, servicing and construction). It may be difficult to provide off-street space for bicycle storage in new developments because of the intensity of development in the area, but I am satisfied that Policy T1c. should afford some flexibility.
- 4.37 A London taxi driver questioned whether total gridlock would occur if traffic was confined to the main distributor roads and given restricted access only to smaller roads, as proposed in Policy T1d. The SOCG proposes modifications to paragraph 9.5 to remove the reference to named major highways and confirm that access for taxis, emergency vehicles and deliveries to smaller side streets should be maintained. I consider that Policy T1 satisfies the Basic Conditions, but the supporting text should be modified, as in **PM16** so that the FWNP is more reflective of the emerging London Plan policy for sustainable transport.
- 4.38 The SOCG proposes modification to Policy T2: Improving the distribution and delivery of goods to local businesses. This would remove the

generalised reference to increasing the use of electric vehicles, which is arguably not subject to control through planning, but add a clause supporting sustainable means of goods distribution including use of electric vehicles, cargo bicycles and walking. I support this modification as in **PM17**, having regard for national policy and to contribute to the achievement of sustainable development.

- 4.39 The Appendices to the FWNP include some useful information for its readers and users, as I reported in paragraph 4.9 above. Subject to modifications set out earlier in my report, I consider that the Appendices add value to the overall Plan. As long as the proposed modifications **PM4-17** are made, I conclude that the policies and their supporting text satisfy the Basic Conditions for neighbourhood planning.

5. Conclusions

Summary

- 5.1 The FWNP has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendums and their Area

- 5.3 I have considered whether or not the area for the purposes of the two referendums should be extended beyond the designated area to which the Plan relates. The FWNP as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendums to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendums on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 The FWNP is a concise and focussed neighbourhood plan which follows a well-designed structure. Its policies follow from a community vision, followed by forward-looking objectives for five key areas (regeneration, business uses and development, green and open space, environmental quality, and mobility and transport). I commend the Forum for producing a well-written document which deals with the complexities of this intensively developed part of Central London in a logical and

comprehensive manner. It is noteworthy that a significant number of the responses to the Regulation 16 consultation exercise expressed support for the submitted FWNP. As the Neighbourhood Forum was first designated in March 2014, and re-designated in February 2020, the Forum has had to carry out a considerable amount of work preparing and developing the Plan over a number of years. The Forum has had to deal with ongoing changes, most recently those surrounding the Covid-19 pandemic. In addition, the Plan has been prepared in the context of changes at the strategic planning level, because both the London Plan and WCC City Plan are currently being revised. I congratulate the Forum for producing the WFNP which, following referendum and adoption, should greatly assist decision-taking on development proposals for Fitzrovia West.

Jill Kingaby

Examiner

Appendix 1: Modifications

Note: References to the 'SOCG' in the proposed modifications (as set out below) are to the December 2020 published version¹¹, attached as Appendix 2 to this report.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Front Cover Page 7	FITZROVIA WEST NEIGHBOURHOOD PLAN 2020 to 2035 40 Paragraph 1.2 Last line - ...change over the Plan period 2020 to 2035 40 .
PM2	Page 10	Modify paragraph 3.1 as in the SOCG.
PM3	Pages 10/11	Add a new paragraph 3.5 as written in the SOCG.
PM4	Pages 17/18 Page 58	Policy PR1: Promoting Regeneration Modify as written in the SOCG, and add the following: 5. VII Developments should achievenot increasing the heat island effect, or worsening air quality and keeping energy use Appendix 6: Glossary Delete 'Tall Buildings' definition and replace with the wording in the SOCG.
PM5	Pages 20/21 & 24	Policy PR2: Housing Provision Modify as written in the SOCG but exclude clause VI (as highlighted in yellow). Delete paragraph 5.21 from the 'Justification' text.
PM6	Pages 24/25 & 27	Policy PR3: Tourism, Arts, Culture and Entertainment Uses

¹¹ View at: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/city-plan-neighbourhood-planning-and-planning-policy/fitzrovia-west-neighbourhood-plan>

		<p>Modify as written in the SOCG.</p> <p>Modify paragraph 5.26:</p> <p>Residents are particularly ... through a legal agreement, where appropriate. <i>Development proposals should have regard to their effect on pedestrian flows, and avoid the need for 'A' boards where narrow pavements prevail.</i> Local community functions</p>
PM7	Pages 27/28	<p>Policy PR4: Retaining and Expanding Community Facilities</p> <p>Modify as written in the SOCG.</p>
PM8	Pages 29/30	<p>6 Supporting Business Uses and Development</p> <p>Modify Objective 4.4.1 and paragraphs 6.1 to 6.5 as written in the SOCG.</p>
PM9	Page 30	<p>Policy B1: Small Business Units</p> <p>Modify as written in the SOCG.</p>
PM10	Pages 31/32	<p>Policy B2: Retail and Related Uses <i>Street Frontages</i></p> <p>Modify as written in the SOCG excluding clauses I and VI (highlighted in yellow).</p> <p>Paragraphs 6.10 and 6.11 modify as written in the SOCG as paragraphs 6.9 & 6.10, but delete the final sentence, shown highlighted in yellow, beginning "As air quality improves".</p> <p>In addition, add 2 new sentences to the end of 6.11:</p> <p>The Oxford Street District Place Strategy and Delivery Plan was published by Westminster City Council in February 2019. It aims to improve and enhance Oxford Street from Marble Arch to Tottenham Court Road as a place to live and work, whilst securing its position as a leading retail destination within London.</p>

		<p>Appendix 5 – Key Sources (cited and consulted) insert:</p> <p>City of Westminster, Oxford District Place Strategy and Delivery Plan February 2019.</p>
PM11	Pages 35-38	<p>Policy GS1: Protecting and Enhancing Existing Green and Open Space</p> <p>1. Development</p> <p>2. The following areas, shown on Figure 8, although not officially</p> <ul style="list-style-type: none"> • Triangle at NW corner ... (see Figure 3) <p>Figure 8: Proposed Public Realm Priority Projects</p> <p>Add the four areas named in Policy GS1 clause 2 to the map.</p>
PM12	Page 36	<p>Policy GS2: Creating New Green and Open Spaces</p> <p>Modify as written in the SOCG.</p> <p>Add reference to Strategic Policy Context: WCC Trees and the Public Realm SPD (2011).</p> <p>Modify paragraph 7.6 as in the SOCG.</p>
PM13	Page 41	<p>Paragraph 8.2</p> <p>Re-write the paragraph as follows:</p> <p>Oxides of nitrogen (NOx) and particulate matter (PM) are two major contributors to air pollution which stem from road traffic, domestic and commercial activities. Figure 9 illustrates the sources of these two major pollutants (NOx and PM10) in Greater London in 2013. The London Atmospheric Emissions Inventory (LAEI) estimated that the major sources of emissions of nitrogen dioxide (NO₂) in the City of Westminster in 2013 were road transport at 57.9%, and domestic and commercial gas at 32.2%. For fine particulate matter (PM2.5), the figures</p>

		were 65.0% from road transport, 11.5% from domestic and commercial gas and 10.0% from non-road mobile machinery. NO ₂ contributes to morbidity and mortality along with fine particles (PM2.5). Public Health England estimates that 6.7% of deaths in the City of Westminster in 2015 were attributable to human made PM2.5.
PM14	Page 43 Page 58	Policy EN1: Promoting Improved Environmental Sustainability and Air Quality Modify as written in the SOCG (and as highlighted in yellow). Add 'Zero Emissions' definition to the Glossary, as in the SOCG
PM15	Page 43	Policy EN2: Renewable Energy Modify as written in the SOCG.
PM16	Page 48	Strategic Policy Context (following Policies T1 & T2): Add references to Publication London Plan (December 2020): T2 (Healthy streets), T5 (Cycling), T6.1 (Residential parking), T6.2 (Office parking), T7 (Deliveries, servicing and construction), 10.2.8 Vision Zero. Paragraph 9.4 Add a new sentence to the end of the paragraph: It will also support the Mayor of London's Vision Zero aim to eliminate all deaths and serious injuries on the road network by 2041. Paragraph 9.5 Modify as written in the SOCG.
PM17	Pages 47/48	Policy T2: Improving the distribution and delivery of goods to local businesses Modify as written in the SOCG.