

FitzWest

Fitzrovia West Neighbourhood Forum

www.FITZWEST.ORG/wordpress

Westminster City Council
Development Planning,
Westminster City Hall,
64 Victoria Street,
London
SW1E 6QP.

8th November 2014

FROM

Wendy Shillam
Chairman
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Dear Sirs,

Planning Application 14/08576/FULL and associated applications

Development Site 36 to 40 Langham Street and 94 Great Portland Street London

We wish to make representation to you on the above planning applications.

The Fitzrovia West Neighbourhood Forum is now fully constituted and operational, but awaits Westminster City Council ratification to go forward and produce a neighbourhood plan. However we already represent a large number of businesses and residents and it is in this capacity that we write to you.

We are starting to consult with developers who wish to apply for planning permission in the area.

Our aim is to talk to developers at pre-application stage or when particular applications come to our attention. We have consulted with our members and have established a draft checklist. (See below) This checklist highlights the issues that local people and local businesses consider important. We hope that this will give a good steer to applicants, and assist them through the public consultation stages.

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Draft Planning Agenda

Our overall aim is to ensure that:

- We create a **liveable neighbourhood**
- The area supports and nurtures young and interesting businesses, to preserve an **economic vitality**. (Small business in Fitzrovia makes a massive contribution to Westminster's economic wellbeing.)
- We safeguard and improve those aspects of the **urban realm** that is valued by those who live, work and elect to place their businesses here.
- Fitzrovia becomes an environmentally **sustainable neighbourhood**, including reducing pollution, waste and needless energy use.

These aims can be more fully identified by the following issues that have been discussed for this particular application.

I met with the applicants and their agents and presented to them our planning agenda. We were most grateful for the opportunity to discuss the scheme with them and exchange views.

Having now discussed comments with the FitzWest executive committee we make the following observations and request that they be taken into consideration by the planning authority.

This report has been placed on our website.

Liveable Neighbourhoods

Mix	The mix of new dwellings is skewed towards small units. We would prefer to see a wider mix of units, in particular units that have outside space and may be suitable for families.
Affordability	Fitzrovia benefits from a very mixed community. A series of new apartment applications can lead to a polarisation of the community, favouring the better off and single people, to the exclusion of others. We notice that many residential schemes are permitted by WCC with insufficient affordable units on site. We consider on site affordable units to be the best option. If a commuted sum is deemed sufficient we would like guarantees from WCC that that sum will be expended within Fitzrovia.
Amenity/shared spaces	This scheme does not make use of all flat roofs for amenity or shared space. This we consider to be a wasted opportunity, especially as not all flats have the benefit of balconies or

	outside space.
Green space/balconies/outside space	<p>This part of London is very susceptible to the urban heat island effect. Roof gardens and balconies with provision for growing plants can help to ameliorate this effect. Outside space is highly valued by all residents.</p> <p>We support the inclusion of balconies and external space for as many apartments as possible. We do not consider that modifications to unexceptional rear elevations of listed buildings to override the requirement for balconies. Outside growing space and sitting space should take precedent, unless the elevation is of extraordinary quality.</p>
Loss of amenity to other residents	We recognise that balconies and roof gardens will sometimes overlook neighbours. Unless this overlooking is very close or very intrusive, we do not object to it.
Rubbish	Rubbish management in this area is poor. There is a lot of tipping on the street and a lot of rubbish is left out at the incorrect hours. We consider that every application should make a contribution to improvements in the rubbish management in this area. In particular this site is directly opposite a rubbish bin black spot. (Langham Street)
Parking/cycling/pedestrian access	There is no parking on site, we would support this. We believe that the evidence shows that parking on site encourages more car use.
	Cycle parking requires residents to carry their cycles down a flight of steps. We do not consider this suitable as it discriminates against all but the strongest of cyclists. We recommend that a sum be agreed so that street level cycle parking hoops can augment the cycle parking provision.

Economic vitality

Displaced small business	This application will displace a number of small businesses. We are aware that Westminster City Council has made special representation in order to be allowed to maintain such units. We are unaware of any applicant, or council initiative to safeguard this or similar space in the area.
New retail/business space – independent retailers (maintaining smaller sized units)	We wish to ensure that Fitzrovia still remains a buoyant area for new independent businesses, retailers or cafes. We feel the ground floor unit of this scheme, being modest in size would be a beneficial addition to the retail stock.
Internet access	A barrier to business within this area is the very poor quality of internet access. In order to encourage working from home, we recommend that this scheme be invited to provide high quality internet access for all new units.
Opportunities for live/work	We support any initiative or element of this scheme that provides opportunities for these units to accommodate people who live and work within them.

Urban Realm

Listed buildings	<p>This area takes its charm from the rich mix of Georgian, Victorian, Edwardian and 20th Century buildings that have a scale, quality and dignity that is sometimes difficult to find in current applications.</p> <p>We feel that the Edwardian building on Langham Street is a high quality building, taken as a whole, even though we understand that not all of it is listed. We consider it makes an important contribution to the streetscape and should be should be preserved as a whole.</p> <p>We have been advised that the corner building is not in fact Georgian, as the listing implies, but is a later pastiche. If English Heritage and WCC accept this, then we see no reason why it should not be demolished and a new, high quality piece of architecture be constructed in its place.</p> <p>In any event we consider the 'mansard solution' inappropriate and ungainly.</p> <p>If the building is considered to really be Georgian we would only entertain a complete and accurate refurbishment, without additions to the roof.</p>
Scale	<p>Fitzrovia is generally a mid-rise area, with very few existing buildings rising above six or seven storeys. Any application to exceed this limit must be environmentally sustainable and offer an exceptional piece of architecture. High buildings can overshadow and produce local microclimates and high winds. We expect WCC to satisfy themselves that all technical studies have been carried out to ameliorate any adverse microclimate or overshadowing issues.</p>
Streetscape	<p>Streetscape in this area is generally poor. Street surfaces are old and lumpy, pavements are often too narrow, and street furniture is poor.</p> <p>We expect every application to make some contribution to the improvement of streetscape in our area, up to a standard appropriate for the heart of the World City, and a popular tourist area.</p>
Importance of the cross route	<p>BBC/Great Titchfield Street In this particular case the application site abuts Langham Street. Because of the opening of the new BBC building, with upwards of 6,000 staff, we have noticed a rise in the pedestrian flows along this street. Consideration now should be given to widening the footpath and narrowing the carriageway along this street, to accommodate pedestrian and cycle priority. This application should make some contribution to that work.</p>
Dealing with the eye-sore rubbish bins	See above

Sustainable Neighbourhood

We have already discussed some of these issues in our comments above.

- Reduction in traffic
- Reduction in use of carbon fuels
- Cycles
- Passive energy saving
- Greenspace
- Recycling
- Local services

We note that the new apartments are through apartments, with windows on both sides. We applaud this approach. Single fronted apartments are very difficult to naturally ventilate. However we also note that the intention is to comfort cool the units. We do not feel that this is necessary or desirable. Small scale units in a moderate climate do not need air conditioning of any type. This is not a noisy location. (Indeed if it were, then residential accommodation would not be appropriate.)

Where high quality accommodation is being constructed, in such a high value area as this, we would expect it to be built to the highest sustainability standards. We note that the plant room is very large.

Yours sincerely

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