

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

Ian Corrie
Development Planning
Westminster City Council
PO Box 732
Redhill RH1 9FL

Your reference: 17/10473/FULL

By email: southplanningteam@westminster.gov.uk

21 December 2017

Dear Ian

Objection to planning application 17/10473/FULL for 2 Montpelier Street, London SW7 1EZ

Thank you for your letter dated 8 December 2017.

I am writing on behalf of the Knightsbridge Neighbourhood Forum (Forum) to object to the planning application for change of use of the basement and ground floor from Class A1 to mixed Class A1/A3 (the Application). The Forum is aware of the Knightsbridge Association's (KA's) objection and is submitting this complementary objection. The planning application can be seen here:

<http://idoxpa.westminster.gov.uk/online-applications/applicationDetails.do?keyVal=OZXCW3RPI7O00&activeTab=summary>

As you may know, the Forum submitted the Knightsbridge Neighbourhood Plan (Plan) to Westminster City Council (WCC) on 22 November 2017 and WCC launched a Regulation 16 consultation on it on 20 December 2017. The Consultation can be seen here:

<https://www.westminster.gov.uk/NP-knightsbridge>

The Plan carries weight in decision-making as an emerging neighbourhood plan which will form part of the development plan for Knightsbridge, after passing a referendum, alongside the Westminster City Plan (WCP).

The Forum brings to your attention that 2 Montpelier Street is in a highly sensitive location within:

- One of two International Shopping Centres in London (per the London Plan and WCP)
- Core Central Activities Zone (per the London Plan and WCP)
- Knightsbridge Conservation Area (per WCC)
- Kensington Squares Character Area (per WCC)
- View north along Montpelier Street (defined in **Policy KBR5** in the Plan)

- Neighbourhood Stress Area (defined in **Policy KBR15** in the Plan)
- Local Roads (defined in **Policy KBR29** in the Plan)

The applicant's 'Planning, Design and Access Statement' dated November 2017 does not mention the Plan which underwent a Regulation 14 Pre-submission consultation between 8 December 2016 and 15 February 2017 (which set out the Forum's proposed policies including in relation to a Neighbourhood Stress Area) and the Application fails to recognise its significance.

Please note that each planning policy in the Plan is cross-referenced to relevant policies in the WCP, the London Plan and the National Planning and Policy Framework (NPPF). So the issues needing to be addressed in the Plan would need, in most cases, to be addressed also by those other requirements.

The Forum's grounds for objections include:

Policy KBR2: Commercial frontages, signage and lighting

The Forum notes that the property is semi-derelict at the moment.

It is wholly unsatisfactory in the 'Planning, Design and Access Statement' to state vaguely that 'The proposal will re-furbish the frontage to match similar design in the street like Al-Hamidiah and Carpo Frontages' (which are anyway within RBKC not WCC and have been subject to complaints and planning issues).

This is a highly sensitive location, as identified above. Therefore a separate or new application should be required for the commercial frontage to meet fully the requirements of the Plan including **Policies KBR1 (Character, Design and Materials), KBR2, KBR5 and KBR 6.**

Policy KBR5: View north along Montpelier Street

Proposals are expected to protect the view north along Montpelier Street from intrusive or insensitive development. A separate or new planning application should be required for the commercial frontage to meet fully the requirements of the Plan including **Policies KBR1, KBR2, KBR5 and KBR6.**

Policy KBR6: Local buildings and structure of merit

The adjacent 4 Montpelier Street has been identified as an important but unlisted building with its redevelopment meeting the requirements of Westminster UDP Saved Policy DES9 (Conservation Areas). This increases the importance of ensuring a high quality frontage signage and lighting at 2 Montpelier Street that enhances the character of the Knightsbridge Conservation Area, Kensington Squares Character Area and the view north along Montpelier Street. A separate or new planning application should be required for the commercial frontage to meet fully the requirements of the Plan including **Policies KBR1, KBR2, KBR5 and KBR6.**

Policy KBR15: Neighbourhood Stress Area

2 Montpelier Street is within the Neighbourhood Stress Area (NSA) defined in the Plan. An illustration of the problems is provided in the 'Planning, Design and Access Statement' with the application in the photograph below paragraph 6.7 (d) i.e. loitering and overcrowding blocking narrow pavements on the opposite side of the road. **Policy KBR15** sets out evidence and tests that

should be applied to address the problems in the NSA. Please refer to the detailed sections in the policy.

Please also note that RBKC has submitted a proposal for a flower stall adjacent to 1-3 Montpelier Street (i.e. on the roadway managed by WCC), which would add to pressures in the Neighbourhood Stress Area, if approved. See:

<http://www.rbkc.gov.uk/PP/17/07015>

Please consider the cumulative impacts of these applications. The Forum is objecting separately to the flower stall.

Policy KBR16: Night-time and early morning uses in or adjacent to residential areas

The application must demonstrate that it will not have an adverse impact on residential amenity. Again, an illustration of the problems is provided in the ‘Planning, Design and Access Statement’ with the application in the photograph below paragraph 6.7 (d). If the application is granted, it should have a condition that the use observes the hours offered by the applicant i.e. 0800-2300 on Monday to Saturday and 0800 to 2200 on Sundays (and Public Holidays) with tables and chairs on the public highway allowed only until 1800.

Policy KBR18: Retail uses in the International Shopping Centre

No evidence is provided that the use would protect or enhance the reputation or standing of the International Shopping Centre. On the contrary, the ‘Planning, Design and Access Statement’ states in paragraph 6.2 that:

“A significant proportion of the sales of sandwiches, confectionary and drinks would typically be for takeaway purposes such that a significant element of the use would fall within use class A1.”

This use would be detrimental to the area.

Policy KBR22: Household and commercial food waste

The application has not addressed waste that may arise from take-aways. This is particularly odd given that the ‘Planning, Design and Access Statement’ states in paragraph 6.2 that:

“A significant proportion of the sales of sandwiches, confectionary and drinks would typically be for takeaway purposes such that a significant element of the use would fall within use class A1.”

Nor has it addressed cooking smells and other odour that has been a particular problem emanating from that building other than to say that they will share a flue with 128 Brompton Road i.e. even with Class A1 use. No information is provided about the suitability or capacity of the flue from 128 Brompton Road.

Please note that the configuration of walls at the rear of the property creates a deep well that traps cooking smells and odour near air inlets for other buildings e.g. air conditioning units. This has been a serious amenity problem for immediate neighbours in the past and resulted in complaints.

Policy KBR35: Healthy air

All flues should terminate above the roof height of the tallest part of the development in order to ensure the maximum dispersal of pollutants. We refer you also to **Policy KBR10: Roofscapes and balconies** on the concealment of plant and flues. If the application is granted, please include a condition that there must be no smoking or shisha use at the tables outside (or inside) the premises in order to ensure compliance with **Policy KBR41: Healthy people (Part A)**.

Policy KBR36: Renewable energy

In order to reduce odour and fumes into the well behind the property, microwaves or induction stoves should be used for the small amount of cooking proposed in the application. Any residual emissions to air from cooking or mechanical ventilation should be filtered using regularly maintained and best available technology before being released to the atmosphere in accordance with **Policies KBR10 and KBR35**. Nuisance noise may also be a problem (see **Policy KBR41**).

Character, Heritage and International Shopping Centre

The Knightsbridge Neighbourhood Plan has been carefully developed over more than two years to establish a framework to protect and enhance the Knightsbridge Neighbourhood Area (Area). The application threatens the character of the Area, the status of the International Shopping Centre, would undermine heritage townscapes and raises serious amenity issues. Policies in the Plan seek small improvements to address these serious issues.

Please refuse this application for the reasons given above. If it is approved, please include conditions to address fully all the above issues.

The Forum would be pleased to discuss this application with you.

Yours sincerely

Simon Birkett
Chair

Cc:

Councillor Baroness Robathan
Councillor Baroness Couttie
Councillor Tony Devenish
Melville Haggard, Chairman of the Knightsbridge Association