

[REDACTED]

From: John Pollard [REDACTED]
Sent: 02 February 2018 11:32
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge forum submission

Dear Sirs,

The submission by the Knightsbridge Forum has been long in the making but is substantive and well thought out.

It has my strongest support.

Dr John Pollard.
[REDACTED]

[Redacted]

From: Henry Watkinson [Redacted]
Sent: 02 February 2018 12:12
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Forum

To whom it may concern,

I am a Director of a Knightsbridge based business within the area of the Knightsbridge Neighbourhood Forum and my business has been based here for many years. I would like to express my enthusiastic support for the Knightsbridge Neighbourhood Plan.

The Knightsbridge Neighbourhood Forum document raises many very important issues that are important to keep Knightsbridge as special in twenty years as it is today.

My main area's of concern are road safety, air pollution, cleanliness of the streets and planning policies. I am worried that the surrounding area to where I work is becoming quite tatty and there seems a constant battle to keep this very important part of London looking at its best. I am alarmed, for instance, at the huge increase in organised begging that has sprung up in recent times in this area.

Yours Sincerely

Henry Watkinson
[Redacted]

Henry Watkinson
[Redacted]

[Redacted]

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[Redacted]

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[Redacted]

[REDACTED]

From: Gonet, Teresa [REDACTED] >
Sent: 02 February 2018 13:04
To: Neighbourhood, Planning: WCC
Cc: Planning SE
Subject: FAO: Andrew Barry-Pursell, Highways England response re Knightsbridge Neighbourhood Plan (Regulation 16) Consultation

Consultation: Knightsbridge Neighbourhood Plan (Regulation 16)

Highways England's Ref No: #4255

Dear Andrew,

Thank you for your letter dated 21st December on the above consultation. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

After looking through the documents provided, there are no comments that Highways England would like to make. The area that the Knightsbridge Neighbourhood Plan encompasses is situated away from the SRN and therefore, will have no material impact on the SRN.

Thank you for consulting us and if you have any queries, please do not hesitate to contact us.

Sent on behalf of Heather Archer – Spatial Planning Manager at Highways England

**Teresa Gonet,
OD SE Spatial Planning Team**

[REDACTED]

[REDACTED]



From: George Wilk [REDACTED] >
Sent: 02 February 2018 13:54
To: Neighbourhood, Planning: WCC
Cc: Knightsbridge Association.
Subject: RE: Knightsbridge Forum



2nd February 2018

Dear Sir/Madam,

Regarding a long term policy for Knightsbridge the following are issues that we consider important:

OBJECTIVE: Diversity of shops and restaurants

REASON: To avoid Knightsbridge servicing solely a subset of a community eg transit visitors from the middle-east. In order to keep local residents, Knightsbridge needs shops that also serve local people.

OBJECTIVE: Clean air by limiting traffic and encouraging non pollution

REASON: Health of local people and tourists

OBJECTIVE: External appearance of properties.

REASON: Makes the area more appealing to all. Including encouragement of real flowers in window boxes and planters as opposed to the current trend to have plastic flowers instead.

OBJECTIVE: Limit rentals such as air-bnb eg by informing people of possible loss of zero capital gains tax on main residence and obligation to declare revenues.

REASON: Changes character of local area and creates unnecessary disturbance.

Best regards,

George and Federica Wilk

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 ████████████████████
 2nd February 2018

Neighbourhood Planning, Policy and Strategy,
 Westminster City Council,
 6th Floor, 5 The Strand,
 London, WC2N 5HR

Dear Sir/Madam

**Representation on the Knightsbridge Neighbourhood Plan (KNP) 2017-2037 Submission
 Version and Supporting Documents**

I am writing to make representations in relation to the above documentation on behalf of the Mews Association as while the Plan contains much of merit, we consider that elements of the Plan do not meet the requirement to be in compliance with the Basic Conditions – in particular:

- *have regard to national policies & 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;*

2. We would ask that changes be made to bring those elements of the Plan that do not meet the requirements into line with the basic conditions.

3. Before I set out the detailed ways in which we consider certain specific KNP policies/proposals are not in line with the basic conditions, I will set out in more general terms the nature of residents' concerns in hope this makes it easier to understand the more detailed points made below. In short, we consider in certain respects the Plan and parts of its supporting documents

- do not provide an accurate description of the area termed by the KNP as the Strategic Cultural Quarter – mis-describing its character and failing fully to describe or take into account the large numbers of residents/residential homes and the variety of architectures and buildings in the area and other uses of property there
- incorrectly refer frequently to the needs and dominance of institutions in a much wider area than that actually covered by the Forum. Many institutions highlighted are entirely outside the area covered by the KNP yet their existence is used to justify proposals in the KNP - and these are proposals that would have a significant impact on a Borough and residents who live outside the area covered by the KNP who have no vote. This blurring of the role of the KNP into areas outside its coverage where it has no locus is misleading and undemocratic.
- This mischaracterisation of the area has resulted not just in inaccuracy but, more significantly, in unbalanced and partial proposals that favour the needs and wishes of the educational and cultural institutions over those of others. And this is to the significant detriment of others, not just in the area covered by the KNP, but in the Boroughs of Westminster, Kensington and Chelsea and in London as a whole.

4. In my detailed comments below, I will show that the concerns set out above result from misinterpretation / partial citation from the London Plan and the Westminster City Plans, NPPF etc. Were the KNP in general conformity with the strategic policies of the development plans

for the area (or had the Forum responded to multiple and repeated representations from local residents on this topic during consultation) our concerns above would not have arisen.

5. I should say that because I am making comments on the text in the order the text appears in the KNP, sometimes our comments may appear initially insignificant as the full import of the earlier text does not become clear until later in the document (where the policies which cause our concerns about earlier text are set out in detail).

6. In each section I set out the text of the KNP we consider not to meet the requirements of the basic conditions and then I set out the text in the Westminster City Plan and/or the London Plan which demonstrates that the KNP text cited is not in conformity with these policies and thus is not in conformity with the basic conditions.

Knightsbridge Neighbourhood Plan 2017-2037 submission version: hereafter termed KNP

KNP: THE LOCAL CONTEXT ‘Knightsbridge - representing the best of everything’

Text that does not reflect the Basic Conditions

KNP Page 11 para 0.13 “In addition to part of the Neighbourhood Area falling within a strategically important retail location in London, the CAZ also identifies the western end of the area as having a strong ‘academic’ and ‘arts, culture and entertainment’ character.” [no reference to the number of residents and the residential character of the area]

KNP Page 14 para 0.26 “Westminster’s City Plan (WCP) .. recognises the three very different aspects and roles of Knightsbridge including: international importance to arts, culture and education; an international shopping centre; and a very residential character. The Neighbourhood Plan aims to ensure that the character and function of the long-standing residential communities are not lost by encroachment of other uses. Whilst all policies in the WCP are relevant, key aspects that are considered to relate to Knightsbridge and the issues raised in the preparation of the Plan include [Housing policy is omitted]”

KNP Page 16 “Community 5.0 Protect and enhance existing residential amenity and mix: Culture and education 6.0 Foster an environment that enables our world-class cultural and educational institutions to thrive as centres of learning and innovation within a flourishing community” [KNP Policy 6 is in conflict with Policy 5 as policy 6 is allowed to over-ride residential amenity and mix]

7. While the KNP text here acknowledges that the Westminster City Plan (WCP) CAZ recognises the very residential character of Knightsbridge and the need to “Protect and enhance existing residential amenity and mix”, the description in the KNP here and later in supporting documents (such as the statement of compliance with basic conditions):

- fails to highlight significant/relevant other statements in the WCP which set out WCP intent and requirements for residential development and preservation of residential amenity in the Borough including this area in a manner different to that described in the KNP; and
- later in the KNP, dis-applies the KNP’s own stated intent and policies (e.g Policy 5) and the policies of the WCP by putting forward proposals that fail to “Protect and enhance existing residential amenity and mix” and allow the “character and function of the long-standing residential communities” to be “lost by encroachment of other uses” by giving absolute priority to cultural/educational uses in the area the KNP terms the Strategic Cultural Quarter.

Relevant statements in the WCP (underlining = my emphasis) showing how WCP objectives for and policies towards the area are not comprehensively reflected in/are in conflict with the KNP

are as follows:

- Page 14 2.22 Provision of housing within [the CAZ] is also intrinsic to its uniqueness and success. From flats in Soho to large residential neighbourhoods such as Pimlico, this residential element plays a major role in defining the character of different parts of the CAZ. The mix of uses must be carefully managed to ensure that a healthy and safe residential environment is maintained.
- Page 20 WESTMINSTER'S STRATEGIC OBJECTIVES
- 3. To maintain and enhance the quality of life, health and well-being of Westminster's residential communities; ensuring that Westminster's residents can benefit from growth and change;
- 4. To increase the supply of good quality housing across all parts of the city to meet Westminster's housing target, and to meet housing needs...
- Page 31 MIXED USES IN THE CENTRAL ACTIVITIES ZONE
- 3.5 There is strong competition for floorspace within the CAZ from internationally important activities and functions, but it is vital that consideration is also given to the place of residential communities and housing in the Central Activities Zone.
- 3.6 Managing Westminster's CAZ is all about balance. The mixed character of the CAZ is central to its economic vibrancy and is also crucial in attracting visitors and businesses. It also makes a significant contribution to the unique character of Westminster. It is acknowledged that in seeking mixed use, potential conflicts may be created which need to be managed. However, the benefits of genuine mixed use outweigh the difficulties of securing mixed use development or the additional management needs that may be generated by such a complex environment.

KNP POLICY KBRI: CHARACTER, DESIGN AND MATERIALS

Text that does not reflect the Basic Conditions

Proposals for new development or the redevelopment of existing buildings should contribute towards the local distinctiveness of Knightsbridge. Proposals should address the following criteria
ii. Area 2 ('Albertopolis' 2) – *buildings in red brick or terracotta, on large plots and of a large scale.*

8. This policy is too restrictive and does not allow for development to respond to the specific local and existing context in this area - nor does this policy reflect National Conservation Area Policy. Not every existing building in this area is large, or in red brick or terracotta. Large scale buildings in the wrong location in this area could have damaging impacts on the living conditions of residents in the area or indeed workers in their offices and there are significant buildings in this area built in stone and other materials which add to the character of the area. This policy should be made less prescriptive and required to respond to National policy on Conservation Areas and Borough policy on planning development.

Relevant statements in the London Plan (underlining = my emphasis) showing how its objectives and policies are not reflected in/are in conflict with the KNP are as follows:

page 288 POLICY 7.4 LOCAL CHARACTER

Strategic

A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.

Page 292 POLICY 7.6 ARCHITECTURE

Strategic

B Buildings and structures should:

c comprise details and materials that complement, not necessarily replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

Page 292 7.21 Architecture should contribute to the creation of a cohesive built environment that enhances the experience of living, working or visiting in the city. This is often best achieved by ensuring new buildings reference, but not necessarily replicate, the scale, mass and detail of the predominant built form surrounding them

KNP POLICY KBR8: PEDESTRIAN MOVEMENT ALONG, ACROSS & ADJACENT TO MAIN ROADS

Text that does not reflect the Basic Conditions

A. Development proposals should seek to improve pedestrian movement along, across and adjacent to Main Roads in the Knightsbridge Neighbourhood Area, subject to approval by Transport for London. This will particularly be the case if it would reduce pressures at existing pedestrian crossings or specific hotspots of pedestrian congestion at bus stops.....

C. The following are classed as Main Roads for the purposes of the Neighbourhood Plan:

- *Brompton Road*
- *Exhibition Road*
- *Kensington Road*
- *Kensington Gore*
- *Knightsbridge*
- *Prince Consort Road*

KNP Evidence Base

Text that does not reflect the Basic Conditions

2.9 The benefits of giving greater priority to pedestrians whilst not adversely impacting on the operational requirements of the cultural, education and research institutions or on the need for residents to have access to their homes should be explored. ... Copenhagen crossings at road junctions work by blending the pavement into the road to signal to drivers that they are entering a pedestrian area where they must allow pedestrians and cyclists to move. These are strongly supported.

9. This policy is also too restrictive and sweeping/absolute and does not allow for development to respond to the specific local and existing context in this area. Exhibition Rd is an entirely different road to others mentioned (relatively recently it has been transformed through major development into a form of shared space – a process that significantly improved pedestrian movement). Categorising this road alongside all the other main roads which have an entirely different character fails to respond to the local context – a key requirement of National and WCP policy – and also fails to take account of the fact that other road users have already been required to reduce their use of the road to improve pedestrian movement in this area (which renders the proposal unbalanced).

10. Nor does the KNP text take account of the fact some of these main roads – including Exhibition Road - extend outside the area covered by the KNP and indeed outside the Borough of Westminster. Changes which “improve pedestrian movement along, across and adjacent to Main Roads in the Knightsbridge Neighbourhood Area” and “Copenhagen Crossings” could have significant impacts outside the area covered by the KNP in terms of displaced traffic, activity and pedestrians and design incongruity. As such, any such changes should be subject to consultation with and approval from not just Transport for London but also the RB of Kensington and Chelsea who will have residents and businesses affected by any change to Brompton Road and Exhibition Road – and potentially from changes to other roads if this results in congestion on roads and pavements outside the Borough.

Relevant statements in the London Plan (underlining = my emphasis) showing how its objectives and policies are not reflected in/are in conflict with the KNP are as follows:

Page 291 - 7.20 The public realm does not necessarily recognise borough boundaries. Cross borough working at the interface of borough boundaries should therefore be maximised to ensure a consistent high quality public realm.

KNP: Page 48-49 POLICY KBR24: RESIDENTIAL MIX INCLUDING TO SUPPORT LOCAL WORKERS AND STUDENTS

Text that does not reflect the Basic Conditions

B. Proposals to deliver housing which addresses the accommodation needs of students that study or employees that work within the Neighbourhood Area are encouraged. This is particularly the case for students and workers in the Strategic Cultural Area.

5.3 One issue raised by the cultural and educational institutions was the difficulty for many of their workers in finding suitably priced residential accommodation within an acceptable commuting distance of their work. The availability of housing at an affordable price (as distinct from 'affordable housing') for those people who work there is a key issue which threatens to undermine the operation and ongoing success of the cultural and educational institutions. This is a London-wide and complex issue. For many, the cost of commuting itself is high so the opportunity to live within walking distance of their work would be financially beneficial. However, this would only be the case if house prices and rents were affordable for such workers. The same applies for students attending the educational institutions.

5.4 Proposals to provide affordable housing which is covenanted for occupation by local workers in the cultural and educational institutions, and under which the local workers will only keep their affordable home subject to continuing working in the cultural and educational institutions, are encouraged.

KNP Evidence Base

5.2 There was concern in the community, including within cultural and education institutions, that not enough is being done to enable those working or studying in the area to have the opportunity to live here.

11. These proposals are in clear conflict with the policies set out in both the WCP and the London Plan – and it is puzzling that the KNP in its Evidence Base (para 6.4) has chosen to quote from part (but only the part that stresses the importance of universities) of the paragraph in the London Plan which expressly contradicts the KNP proposals set out here.

12. The WCP sets out in considerable detail the shortage of housing in the Borough and the serious impacts this has on Borough residents – including a waiting list of 5,500 'households in priority need'. The need for and the painfully slow process of creating any new homes in the Borough – let alone affordable homes – is documented in detail in the WCP and there are finite limits on the creation of any form of housing in the Borough. In no shape or form can students attending or workers in cultural institutions be considered 'households in priority need'. There can be no justification for the special treatment proposed for students and workers in cultural institutions (and for accommodation that might be built for them) and for them alone - in the KNP. Allowing this prioritisation would put Borough residents in need and all other workers in the Borough at an unfair disadvantage. Equally, the only category of non-resident listed as in need of specialist housing provision in the Borough in the WCP is that of "key workers" a Government definition (eg. covering nurses and firefighters) that includes neither students nor workers in cultural institutions. If workers are unable to afford to commute to the institutions they – like every other employer in the Borough – will need to pay higher wages not seek special privileges that by displacement would put many 1000s of others (who seek permanent

accommodation in the Borough and have a far stronger claim for assistance with the costs of living in the Borough) at a disadvantage.

Relevant statements in the WCP (underlining = my emphasis) showing how WCP objectives for and policies towards the area are not reflected in/are in conflict with the KNP are as follows:

“Page 75-76 AFFORDABLE HOUSING 4.13 Westminster has an acute need for affordable homes, in both the social and intermediate sectors. An additional 5,600 social rented homes (or other affordable housing to meet the needs of those eligible for social housing) would be required annually to meet demand xiii. There is typically a waiting list of about 5,500 ‘households in priority need’ for social housing”

Reasoned Justification: The acute shortage of affordable housing, and the difficulty in developing it in Westminster, means that all affordable housing floorspace must be safeguarded and will need to be replaced as affordable housing upon redevelopment. Although this will normally be social and intermediate housing units; it will also include specialist provision (including non-self-contained accommodation) for specific groups such as the elderly or key workers, if the charges made to residents are substantially below market levels.”

13. The London Plan goes further, stating that student housing should be addressed “without compromising capacity for conventional homes” and stating that any further provision of student accommodation in the 4 central London Boroughs would challenge this objective not to compromise capacity for conventional homes. It points to the fact that student accommodation is already excessively concentrated in central London Boroughs (including Knightsbridge) that students put pressure on other elements of housing stock and that the London Plan would “encourage a more dispersed distribution of future provision taking into account development and regeneration potential in accessible locations away from the areas of greatest concentration in central London, “

Relevant statements in the London Plan (underlining = my emphasis) showing how the Plan’s objectives for and policies towards the area are not reflected in/are in conflict with the KNP are as follows:

Page 59 POLICY 2.10 CENTRAL ACTIVITIES ZONE – STRATEGIC PRIORITIES

Strategic

i enhance the strategically vital linkages between CAZ and labour markets within and beyond London in line with objectives to secure sustainable development of the wider city region

Page 109 POLICY 3.8 HOUSING CHOICE

Strategic: h strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.

Pages 113-114 3.52 London’s universities make a significant contribution to its economy and labour market (Policies 3.18 and 4.10). It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. While there is uncertainty over future growth in the London student population and its specialist accommodation needs, including the unmet demand, there could be a requirement for some 20,000 – 31,000 places over the 10 years to 2025/78. New provision may also tend to reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector. The SHLAA has identified a pipeline of circa 20,000 student bed spaces 2015–2025.

3.53 Addressing these demands should not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. This may raise particular challenges locally, and especially in four central London boroughs 79 where 57% of provision for new student accommodation has been concentrated.

3.53A In addressing the need for specialist student housing, the Mayor will support proactive, partnership

working by boroughs, universities, developers and other relevant bodies, including through his Academic Forum, to:

- encourage a more dispersed distribution of future provision taking into account development and regeneration potential in accessible locations away from the areas of greatest concentration in central London;

POLICY KBR26: EXISTING AND NEW DEVELOPMENT WITHIN THE STRATEGIC CULTURAL AREA

Text that does not reflect the Basic Conditions

B. New development for cultural, education, research or other uses which strengthens the role, reputation or experience of visiting the Strategic Cultural Area and retains or enhances the area's special character will be supported, subject to accordance with other development plan policies.

D. Other types and forms of development may also be appropriate if it can be demonstrated that they do not adversely impact on the special character of the area.

Existing uses *The existing cultural, education and research uses within the Strategic Cultural Area (SCA) are the primary elements which combine to create the Area's special character., it is the concentration of cultural, education and research uses and activities – of people working in, teaching in, learning in, and visiting the area – which underpins the character of the area.*

Continuing to promote the vision of 1851

6.2 Created from the legacy of the Great Exhibition of 1851 as a centre of knowledge and inspiration in the arts, science and design, the Strategic Cultural Area which straddles the boundary of the Knightsbridge and Kensington area is home to three of the world's most popular museums ...

6.3 The Royal Commission for the Exhibition of 1851, appointed to organise this undertaking, was subsequently made permanent and oversaw the establishment of the cultural quarter on 87 acres of land that it purchased with the Exhibition's profits. The Commission's work continues to this day and, whilst acting as landlord for much of the original estate, its central aim is to promote the Commission's founding president Prince Albert's original aim of "increasing the means of industrial education and extending the influence of science and art upon productive industry". Development within the Strategic Cultural Area should be guided by Prince Albert's ambitions for the Area. ... the primary consideration should be the extent to which new development is in keeping with this original vision.

Importance of the SCA institutions and the need for ongoing investment

6.5outside the Plan area, the three major museums south of the area attract around 11 million visitors a year¹⁵, many of whom will walk up Exhibition Road toward the Royal Albert Hall, Albert Memorial and Hyde Park.

Knightsbridge Evidence Base

6.5 The cultural and educational policies seek to honour the original aims of the Royal Commission through the continued promotion of the Area's unique cultural assets. This will be undertaken whilst recognising that the Area has matured into an established and thriving residential area.

KNP Evidence Base

6.9 The existing cultural, education and research uses within the Strategic Cultural Area are the primary elements which combine to create the Area's special character. Whilst the townscape characters of many of the individual buildings play a crucial part in establishing this unique character, it is the concentration of cultural, education and research uses and activities – of people working in, teaching in, learning in, and visiting the area – which underpins the character of the area. Loss of these uses through redevelopment would undermine the quality of this internationally important cultural quarter which plays such an important role in maintaining London's position as a pre-eminent international centre

for the arts and sciences. Decisions made on development within the Strategic Cultural Area should be made in view of Prince Albert's original vision to "increase the means of industrial education and extend the influence of science and art upon productive industry". This should not limit evolution or innovation but the primary consideration in decision making should be the extent to which new development is in keeping with this original vision.

6.11 New development for cultural, education and research uses, particularly new development which will make a positive contribution to the area's special character will, subject to other policies in the Plan, be supported in principle. Other types and forms of development may also be appropriate if it can be demonstrated that they do not adversely impact on the special character of the area. It is important that the key cultural, education and research bodies and institutions within the Strategic Cultural Area continue to evolve, regenerate and improve to ensure they maintain their position as international leaders in their respective fields.

6.12 These policies relate to all scales of development. This includes grand and larger scale regeneration projects which represent high profile major investments which will make significant contributions to improving efficiency, quality or capacity of relevant bodies.

14. We completely agree that existing Cultural, Research and Educational uses in the area covered by the KNP should be conserved. We also note the WCP Policy S9 is clear that "New tourism, arts, cultural and educational uses and appropriate town centre uses should be directed to the Strategic Cultural Area" and that Policy S27 states "new international and nationally important uses will be encouraged within the Core Central Activities Zone" This is agreed policy – although we note the London Plan also states "4.34 Culture also plays a valuable role in place shaping, especially by engaging younger people in wider community activity. It is therefore important to expand London's cultural offer beyond central London"

15. However, the KNP in this entire section goes well beyond this agreed policy bringing forward proposals that favour cultural/educational uses, and developments in support of them, above all other sorts of development and uses and above the needs of others in the Borough. It effectively says all development in the area should be for educational or cultural use. It also supports such developments in absolute terms – thus presenting unbalanced recommendations that do not take into account the needs of residents in the area or the potential impact on local residents of these absolute recommendations for support of cultural/educational development. It also does not acknowledge, let alone take into account other WCP policies in relation to limiting the nuisance developments such as they propose could cause to residents and neighbours.

16. There can be no justification for the KNP's statement "Development within the Strategic Cultural Area should be guided by Prince Albert's ambitions for the Area. ... the primary consideration should be the extent to which new development is in keeping with this original vision." These ambitions are in conflict with the WCP and London Plan's repeatedly stated policies towards the area, including policies on housing. Indeed, the KNP's description of the area as deriving its character only and solely from the educational and cultural uses in the area is also in conflict with the WCP which says of Knightsbridge "3.42 Lying west of the International Shopping Centre of Knightsbridge, residential use dominates this area" and in relation to S9 states "This policy recognises the two very different aspects and roles of this area: one of international importance to arts, culture and education, and the other of very residential character. This approach ensures that the character and function of the long-standing residential communities are not lost by encroachment of other uses."

17. The KNP Evidence base also implies that residential properties came late to the area, stating "The cultural and educational policies seek to honour the original aims of the Royal Commission through the continued promotion of the Area's unique cultural assets...while recognising that the Area has matured into an established and thriving residential area." In fact

the boot is on the other foot - many residential properties in the area were in existence long before the educational institutions were even founded. The KNP here also as stated above

- does not provide an accurate description of the – mis-describing its character and failing fully to describe or take into account the large numbers of residents/residential homes and other uses of property in the area. The London Plan map page 156 **Map 4.2 London’s Strategic Cultural Areas** itself states “Site boundaries shown on the map are indicative and include areas with other land uses”
- incorrectly refers frequently to the needs and dominance of institutions in a much wider area than that actually covered by the Forum. Many institutions highlighted are entirely outside the area covered by the KNP yet their existence is used to justify proposals - and these are proposals that would have a significant impact on a Borough and residents who live outside the area covered by the KNP who have no vote. This blurring of the role of the KNP into areas outside its coverage is not in line with locus of a Neighbourhood Plan.
- through mischaracterisation of the area, contains not just in inaccuracy but, more significantly, unbalanced and partial proposals that favour the needs and wishes of the educational and cultural institutions over those of all others. And this is to the significant detriment of others, not just in the area covered by the KNP, but in the Boroughs of Westminster, Kensington and Chelsea and in London as a whole.

Relevant statements in the WCP (underlining = my emphasis) showing how WCP objectives for and policies towards the area are not reflected in/are in conflict with the KNP are as follows:

Page 14 ACCOMMODATING STRATEGIC LAND USES WITHIN A UNIQUE CENTRAL LONDON MIX

2.20 Westminster’s central area, designated the Central Activities Zone (CAZ) within Westminster’s City Plan, contains a mix of uses and activities that is unique both in London and the world. The complex mosaic of land uses gives Westminster its vitality, character and role within London as a world city. The apparent randomness of the mix is the product ... of careful control through planning policies and negotiations. This approach has proved a success: Soho, Mayfair and other central areas have retained their prestige as a desirable location for businesses and vitality and attraction, and the policy approach ensures that no one use dominates.

2.22 Provision of housing within [the CAZ] is also intrinsic to its uniqueness and success. From flats in Soho to large residential neighbourhoods such as Pimlico, this residential element plays a major role in defining the character of different parts of the CAZ. The mix of uses must be carefully managed to ensure that a healthy and safe residential environment is maintained.

2.23 Maintaining such a complex environment will require a similarly rigorous approach over the lifetime of the plan, so as to ensure that incremental changes through site by- site redevelopment do not erode the mix either at a very local level or across the wider area.

2.27 Westminster’s local economy relating to the CAZ also creates challenges for the borough. In many cases developers would prefer single-use office developments rather than a mix ... but such developments threaten the balance of uses which are so important to the character of Westminster’s CAZ.

Page 30 3.1 All this takes place in an area that over 35,000 people call home. These residents create the unique character of Westminster’s CAZ that makes it so different from any other part of London.

MIXED USES IN THE CENTRAL ACTIVITIES ZONE

3.5 There is strong competition for floorspace within the CAZ from internationally important activities and functions, but it is vital that consideration is also given to the place of residential communities and housing in the Central Activities Zone.

3.6 Managing Westminster’s CAZ is all about balance. The mixed character of the CAZ is

central to its economic vibrancy and is also crucial in attracting visitors and businesses. It also makes a significant contribution to the unique character of Westminster. It is acknowledged that in seeking mixed use, potential conflicts may be created which need to be managed. However, the benefits of genuine mixed use outweigh the difficulties of securing mixed use development or the additional management needs that may be generated by such a complex environment.

Page 32 POLICY S1 MIXED USE IN THE CENTRAL ACTIVITIES ZONE

The council will encourage development which promotes Westminster's World City functions, manages its heritage and environment and supports its living, working and visiting populations. Within the CAZ, a mix of uses consistent with supporting its vitality, function and character will be promoted.

Reasoned Justification The council wishes to accommodate the various economic functions that contribute to London's world-class city status and at the same time, build sustainable residential communities. The primary aim of this policy is to maintain and enhance the character and function of the CAZ in Westminster by increasing residential uses..... Bringing new residents into CAZ will contribute to the balance, variety and vibrancy of areas in CAZ.... Mixed use means offices, shopping, entertainment, cultural, social and community and residential uses sharing buildings, streets and localities. The unique and varied mixed use character across CAZ is fundamental in ensuring the vitality, attraction and continued economic success of Central London.

Strategic Policies Page 23 HOUSING 2.40 As a general principle, housing is acceptable on all sites within Westminster and is the priority land use for delivery.

Page 52 Knightsbridge

3.42 Lying west of the International Shopping Centre of Knightsbridge, residential use dominates this area,

Page 53 POLICY S9 KNIGHTSBRIDGE Reasoned Justification

This policy recognises the two very different aspects and roles of this area: one of international importance to arts, culture and education, and the other of very residential character. This approach ensures that the character and function of the long-standing residential communities are not lost by encroachment of other uses.

Page 68 4.2 ...The London Plan sets targets for housing delivery and the policies set out below aim to achieve these targets. The council will need to actively and rigorously pursue housing development if it is to meet its statutory housing target.

4.5 Optimising the number of new homes delivered is even more important in Westminster than in many other London boroughs because ... its global city role means some housing is used as second homes, left empty as an investment, or is used as short-term lets

4.8 The lack of large sites means that housing development in Westminster is usually small scale and involves changes of use and refurbishment and extensions of existing buildings. New homes are therefore expected to be delivered by building to higher densities on existing housing sites, and housing required by the mixed use policy.

Page 90 POLICY S22 TOURISM, ARTS AND CULTURE

Existing tourist attractions and arts and cultural uses will be protected. New arts and cultural uses and tourist attractions will be acceptable within the Core Central Activities Zone, ... and the Strategic Cultural Areas.

Reasoned Justification: This approach will maintain and strengthen Westminster's strategic role within the London tourist industry and help contribute to local opportunities to experience arts and culture, without detriment to residential amenity.

Page 105 POLICY S29 HEALTH, SAFETY AND WELL-BEING

Growth in the Westminster context means mixed use areas and sites, infill development and high density living. It is therefore vital that exceptional attention is paid to protecting existing residential amenity and providing good quality residential accommodation for future residents.

Relevant statements in the London Plan (underlining = my emphasis) showing how its objectives and policies are not reflected in/are in conflict with the KNP are as follows:

Page 44 2.15 With the scale of growth expected in London, places with the scope for accommodating new homes and jobs will be of particular importance.

Page 60 POLICY 2.11 CENTRAL ACTIVITIES ZONE – STRATEGIC FUNCTIONS Strategic A The Mayor will, and boroughs and other relevant agencies should: extend the offer and enhance the environment of strategic cultural areas along the South Bank, around the Kensington Museum complex while also recognising [the CAZ]..... is also home for 284,000 Londoners,

2.45 In practical terms, the Mayor intends to deliver this commitment by continuing to support the unique functions the CAZ fulfils for London, ...Development in the CAZ should ensure strategic and more local needs are met, while not compromising the quality of the CAZ's residential neighbourhoods or its distinctive heritage and environments.

Page 63 POLICY 2.12 CENTRAL ACTIVITIES ZONE – PREDOMINANTLY LOCAL ACTIVITIES Strategic: A The Mayor will, and boroughs and other relevant agencies should: a work together to identify, protect and enhance predominantly residential neighbourhoods within CAZ,

2.56 As well as being an economic hub, the CAZ is a place where many people live – including many people who also work there. It is important to take a balanced approach to addressing both the CAZ's strategic functions and its role as a residential area

2.57 The quality and character of the CAZ's predominantly residential neighbourhoods should be protected and enhanced.

Page 98 POLICY 3.3 INCREASING HOUSING SUPPLY Strategic

A The Mayor recognises the pressing need for more homes in Londonthe Mayor will seek to ensure the housing need ... is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London....

E Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets ...including:

a intensification (see policies 2.13, 3.4) ...

e sensitive renewal of existing residential areas, especially in areas of good public transport accessibility

page 103 3.32 Securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities.

Page 292 POLICY 7.6 ARCHITECTURE Strategic

Planning decisions

B Buildings and structures should:

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

POLICY KBR26: EXISTING AND NEW DEVELOPMENT WITHIN THE STRATEGIC CULTURAL AREA

POLICY KBR27: PUBLIC REALM IN THE STRATEGIC CULTURAL AREA

Text that does not reflect the Basic Conditions

Page 51 KNP C. Ancillary developments within the Strategic Cultural Area which help to broaden the appeal and promote the remit of cultural, education and research organisations to a wider audience will be supported.

Page 52 KNP- 6.7 Ancillary development: The Strategic Cultural Area does not sit within a designated retail centre. Any ancillary commercial development will need to ensure it does not draw trade away from established commercial centres in the vicinity. Therefore any ancillary development should not serve as an attraction in its own right and should be sited, serviced and managed within the associated host institution. Such ancillary A1 or A3 uses might include cafés, canteens and small retail outlets which meet the needs of workers, students, visitors and/or residents of the area. The need for and value of such facilities was identified by both students and residents in the Knightsbridge community.

Page 53 B. Temporary and pop-up events requiring planning permission should be appropriate to the Strategic Cultural Area and the mission and activities of the cultural and educational institutions. Proposals will be expected to show how any potentially adverse impacts on the amenities of established residents and other occupiers in the area have been minimised.

18. The KNP supports ancillary developments “within the Strategic Cultural Area which help to broaden the appeal and promote the remit of cultural, education and research organisations” of all kinds. There is no clear definition of ancillary developments or any limitation on what this might entail and the support is in blanket and absolute terms – thus presenting unbalanced recommendations that do not take into account the needs of residents in the area or the potential impact on local residents of these unqualified recommendations for support of these developments. The KNP policies here also do not acknowledge, let alone take into account other WCP policies in relation to limiting the nuisance ancillary developments (including entertainment uses, cafes, canteens and retail outlets) and servicing of and deliveries to them can cause to residents and neighbours. Significant nuisance is already caused to residents now by such ‘ancillary’ developments in the cultural and educational institutions in the area and several proposals for ‘ancillary developments’ in recent years have been refused by Westminster Council as they were considered to represent an unacceptable risk of harm to residents. This KNP policy represents an unbalanced blank cheque which is not in line with the WCP’s policies.

19. The KNP also takes it as read that “Temporary and pop-up events requiring planning permission” will take place in the area and asks only that “Proposals ... show how any potentially adverse impacts on the amenities of established residents and other occupiers in the area have been minimised”.

20. No justification for such an assumption that such events are without doubt appropriate and should take place in a residential neighbourhood has been provided. Nor is there any acknowledgement in the main KNP that a current Key Decision Policy (Royal Borough of Kensington and Chelsea’s Key Decision Report dated 26 September 2011) is in force, already governs the nature, frequency, number and duration of events in Exhibition Rd in the KNP area and that it conflicts with the KNP policy. The KNP should reflect not conflict with this Key Decision policy which governs use of the Road. This policy acknowledges that the north of Exhibition Rd is unlikely to be suitable for temporary and pop-up events due to its highly residential character. Nor does the KNP refer to the need to consult and agree events in the area – and in particular in Exhibition Rd as this is a requirement of the Key Decision - with the R.B. of Kensington and Chelsea, whose residents can be highly impacted upon and inconvenienced by events in any part of Exhibition Rd or in its vicinity. In addition, the R.B. of Kensington and Chelsea are the responsible body for managing the carriageway of Exhibition Rd.

21. It is notable that policies KBR 26 and 27 are also inconsistent with policy KBR16 in that they offer significantly weaker protections for residents against nuisance than the protections set out in KBR 16 – which are:

KBR16 NIGHT-TIME AND EARLY MORNING USES IN OR ADJACENT TO RESIDENTIAL AREAS

A Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that individually and cumulatively there are no significant adverse effects on:

a. the amenity of residents and other uses that are sensitive to noise;

b. environmental amenity taking into account the potential for noise, disturbance or odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises....

B. Proposals for new (including a change of use to) cafés and restaurants (Class A3), public houses, bars and other drinking establishments (Class A4) and hot-food takeaways (Class A5) in Local Roads must demonstrate that they will have no adverse impact on residential amenity.

22. Nowhere do policies KBR 26 and 27 say that ancillary uses and temporary and pop up events are confined to the normal day time, nor do they say (as in KBR 16) proposals for new cafes, bars, hot food takeaways and restaurants in local roads “must demonstrate that they will have no adverse impact on residential amenity” including from “ the potential for noise, disturbance or odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises”. None of the protections set out in KBR 16 in these circumstances are extended to the residents in the Strategic Cultural Area – it merely says proposals for events should minimise impacts on residents. This too demonstrates that the proposals in KBR 26 and 27 are unbalanced in that they favour the needs and wishes of the institutions over and above the needs of residents and other users of the area.

Relevant statements in the WCP (underlining = my emphasis) showing how WCP objectives for and policies towards the area are not reflected in/are in conflict with the KNP are as follows:

WCP POLICY S24 ENTERTAINMENT USES: New entertainment uses will need to demonstrate that they are appropriate in terms of the type and size of use, scale of activity, relationship to any existing concentrations of entertainment uses and any cumulative impacts and that they do not adversely impact on residential amenity, health and safety, local environmental quality and the character and function of the area.

Page 105 POLICY S29 HEALTH, SAFETY AND WELL-BEING: Growth in the Westminster context means mixed use areas and sites, infill development and high density living. It is therefore vital that exceptional attention is paid to protecting existing residential amenity and providing good quality residential accommodation for future residents.

Page 131-132 POLICY S42 SERVICING AND DELIVERIES: Developments must demonstrate that the freight, servicing and deliveries required will be managed in such a way that minimises adverse impacts. This may include the provision of off-site consolidation centres, shared delivery arrangements, and/or restrictions on the types of vehicles or timing of deliveries, especially where the quality of the public realm, local pollution, ... would be otherwise compromised. Servicing and delivery needs will be fully met within each development site, except where the council considers that this is not possible, in which case the servicing and delivery needs will be met in such a way that minimises the adverse effects on other highway and public realm users, and other residential or commercial activity.

Relevant Policies in the Royal Borough of Kensington and Chelsea which govern events in Exhibition Road – including in the area covered by the KNP showing how the policy towards the

area is not reflected in/are in conflict with the KNP are as follows:

Royal Borough of Kensington and Chelsea's Key Decision Report dated 26 September 2011: The Future Use of Exhibition Road <https://www.rbkc.gov.uk/pdf/future%20use%20KDR%20report.pdf>

Exhibition Road between Cromwell Road and Prince Consort Road

Page 8 - 6.2 This paper recommends that the Exhibition Road Cultural group (ERCG) act as a co-ordinating body for proposals from the institutions for events. The ERCG should encourage well managed proposals and filter those not likely to meet the exacting standards both councils will require for events in this section of Exhibition Rd. The ERCG should make an annual event programme proposal to RBKC, for agreement, no later than six months before the first event in the programme. That programme should contain no more than 6 events in any one year (exclusive of any event described in Section 5 [*a rare and major event of national significance eg. a coronation*]) and no more than 1 road closure in any one year (exclusive of any road closure associated with a major event as described in section 5). All events will be at no cost to RBKC or WCC. All events must be subject to the proper regulation of both RBKC (and WCC if appropriate), and must take into consideration the views of local residents, businesses and institutions. In particular the views of local councillors and residents about acceptable noise levels, access, rubbish clearance and timings must be considered by the proper authorities.

Exhibition Road from Prince Consort Road to Kensington Gore

Page 11. 7.1 This section of Exhibition Rd is entirely within the WCC boundary and is primarily home to residents and embassies as well the Royal Geographical Society. Large numbers of visitors use this section of the road to visit the Albert Hall and Kensington Gardens and Hyde Park. The Royal Parks make a spectacular and appropriate conclusion to Exhibition Road at its northern end.
7.2 Other than as described in Section 5 [*a rare event to mark a national celebration eg. Coronation*] this part of Exhibition Road does not easily lend itself to being a space for events.

In relation to the failure of the KNP to promise to consult and agree proposals with impacts outside the KNP Area with other Boroughs affected, The London Plan is clear

Page 291, 7.20 The public realm does not necessarily recognise borough boundaries. Cross borough working at the interface of borough boundaries should therefore be maximised to ensure a consistent high quality public realm.

If there is a public hearing is held, please will you note that I wish to participate in it. I would also like to be notified of the Council's final decision in relation to the Plan.

Yours faithfully



Jane Whewell
Chair, Princes Gate Mews Residents' Association

From: ONA [REDACTED]
Sent: 04 February 2018 13:13
To: Neighbourhood, Planning: WCC
Subject: Representation against the Knightsbridge Neighbourhood Plan

The Onslow Neighbourhood Association has for the past 40 years worked with the other local associations and The Kensington Society to improve the residents relationship with the local museums, The V & A, The Science Museum and The Natural History Museum. These three museums are all outside the defined area of The Knightsbridge Neighbourhood (KN), although within the local Strategic Cultural Area (SCA).

The KN by introducing their Policies KBR 26 and KBR 27 (both concerning The Strategic Cultural Area) in 'Part One', are seeking to extend their influence outside their defined neighbourhood area into an area where the local residents have no vote on the matters they promote.

It would seem that policy KBR 26 of the KN is contrary to one of the Basic Conditions, namely:

"be in general conformity with the strategic policies of the development plan for the area;"

In the Westminster City Policy where in section S 9 the policy for KNIGHTSBRIDGE is stated as:

"New tourism, arts, cultural and educational uses and appropriate town centre uses should be directed to the SCA (Strategic Cultural Area)."

With the reasoned justification stating "This policy recognises the two very different aspects and roles of this area: one of international importance to arts, culture and education, and the other of very(sic) residential character. This approach ensures that the character and function of the long-standing residential communities are not lost by encroachment of other uses"

But Policy KBR 26 introduces paragraphs A,B,C and D, none of which makes any mention of the residential or 'town centre uses'

Further in the Westminster City Policy under 'Arts and Culture' (page 108) para 4.35 Westminster states ".....The Council works with neighbouring boroughs with respect to the Strategic Cultural Areas,....."

KN policy KBR 26 makes no reference to 'neighbouring boroughs'.

Similarly, Policy KBR 27 does not make mention of 'neighbouring boroughs'.

Consequently The Onslow Neighbourhood Association requests the inspector to strike out sections 6.01,6.02, 6., 6.1 through to and including 6.7, 6.9, 6.10(including policy KBR 26 and policy KBR 27) as well as Sub-Objective 6.2 from the draft Knightsbridge Neighbourhood Forum Plan Part One. And to strike out in Part Two on page 16 the section 'Culture and Education'. And in Part Three to delete pages 66 through to and including 73 'Knightsbridge Culture and Education'

This association would like to attend the hearing and speak if need be.

Richard Skinner (committee member)

[REDACTED]

From: Pamela Aldred [REDACTED]
Sent: 04 February 2018 23:42
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan, 2017-2037 Version

Dear Sirs,

I refer to the proposed Knightsbridge Neighbourhood Plan, 2017-2037 Submission Version, submitted to Westminster Council on 22nd November 2017 by the Knightsbridge Neighbourhood Forum, for a planned policy for the Knightsbridge Neighbourhood Area 2017-2037. As a local Knightsbridge resident within the Area, we fully support and endorse the adoption of the submitted Plan containing its vision, six values, five themes, 10 objectives and 42 policies, to develop planning policy and influence neighbourhood management locally for this unique Area of London.

Yours faithfully, Pamela Aldred
[REDACTED]

Sent from [Mail](#) for Windows 10

[REDACTED]

From: Mt M [REDACTED]
Sent: 06 February 2018 10:58
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood plan

Dear Sir/Madam,

I am writing in favour to the Knightsbridge Neighbourhood plan.

Regards,

Matteo Margaroli

[REDACTED]

[REDACTED]

From: Zahariev [REDACTED]
Sent: 06 February 2018 12:57
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

Dear Sir / Madam,

I work within the area of the Knightsbridge neighbourhood Forum and fully support the Knightsbridge Neighbourhood Plan in all its aspects.

One example where the plan identifies important issues in Knightsbridge is air quality and ease of access by cyclists. The neighbourhood is subjected to increasingly poor air quality and noise. As a cyclist I can confirm that over the last 5 years it has been getting more and more difficult to find a suitable bicycle stand when arriving in the morning for work.

In my view, the Knightsbridge Neighbourhood Plan proposes sensible policies to address the issues in the area. I also particularly support the proposals regarding air quality and the future of the Hyde Park Barracks.

Furthermore the area around Raphael Street and Knightsbridge Green has been increasingly run down, dirty, unsafe and the street drainage does not function in heavy rain. As such I very much support the Neighbourhood Stress Area around Raphael Street and Knightsbridge Green.

Kind regards,

K. Zahariev
[REDACTED]
[REDACTED]

[REDACTED]

From: Jo Upton [REDACTED]
Sent: 07 February 2018 13:56
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

As Property Director for Pegasi, I have a responsibility to those that work for us at our Knightsbridge offices, to our residential tenants, leaseholders and retail tenants, all of whom take part and contribute to the local community and economy. At Pegasi we take a very long term view on our investment in our properties and the enjoyment of those facilities by our customers. Our aim is to ensure that the 'London Living' experience is the best it possibly can be, the dependency on a robust neighbourhood plan in achieving this is significant.

The priorities set out by the Knightsbridge Neighbourhood Forum are predicated very much on the sustainability of this location as somewhere people choose to live, as well as work. The focus on air quality and the environmental vision laid out by the plan is rightly ambitious, but we believe, deliverable given the knowledge and skills of the Forum. The history of this neighbourhood is rooted in the appreciation of exceptional quality in architectural design and place making; I believe that the proposed plan continues this legacy and will foster a renewal of Knightsbridge that is sustainable for the longer term and on this basis, would welcome its adoption.

It is time for Westminster to support a forward thinking plan for this locality. Whilst much of London enjoys a regeneration as a result of carefully considered planning, Knightsbridge is at risk of finding itself in decline and could lose out to other rising stars within London. The increasing preference for urban living and the changing nature of the demographic of those who choose to live and work, retire, or a mix of the two, in London, means that our neighbourhoods must be places that can cater for mixed tenures homes, multi-generational residents and meet their aspirations as well as their needs. Every generation expects to enjoy higher standards of living than the one that went before it and to achieve that, Knightsbridge must raise evolve.

Regards

Jo Upton

Jo Upton
Property Director



[REDACTED]

From: Jonathan Gates [REDACTED]
Sent: 07 February 2018 14:52
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan - Submission (Regulation 16) Consultation

Dear Sir / Madam,

I am writing to confirm my support for the Knightsbridge Neighbourhood Plan. As someone who has worked in Knightsbridge for the past 5 years and thus walks around the area on a daily basis, I can see that it identifies the most important issues in Knightsbridge such as the Future of the Hyde Park Barracks. Of primary relevance to me are air pollution, which is a major concern, and the cleanliness of the streets - particularly the regular standing water present on the roads and pavement. The plan proposes sensible policies to address them. I also support the Neighbourhood Stress Area around Raphael Street and Knightsbridge Green.

Yours faithfully,

Jonathan Gates

[REDACTED]

[REDACTED]

From: Oana Pacurar [REDACTED]
Sent: 07 February 2018 15:14
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan - Submission (Regulation 16) Consultation

Dear Sir or Madam,

I am writing to showcase my support for the Knightsbridge Neighbourhood Plan.

As a person who has been working in the Knightsbridge area for the past year, I express my staunch support for the Knightsbridge Neighbourhood Plan.

The issues raised are highly relevant to the area, especially the problems of air pollution, the future of the Hyde Park Barracks and the Neighbourhood Stress Area surrounding Raphael Street and Knightsbridge Green.

Yours Sincerely,

Oana Pacurar

HEADSTART ADVISERS LTD
[REDACTED]
[REDACTED]

[REDACTED]

From: Henry Peterson Chair SHRA [REDACTED]
Sent: 07 February 2018 22:48
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Draft Neighbourhood Plan

We fully support the Knightsbridge Draft Neighbourhood Plan. Having met with members of the Forum's management committee over several years, we fully appreciate the amount of work that has been involved in bringing the Plan to this stage. Knightsbridge Neighbourhood Forum has shown how policies on challenging and complex issues such as air quality can be addressed at a neighbourhood level, with lessons learned as a result within the new London Plan and by other groups of residents across the capital.

Henry Peterson, Chair St Helens Residents Association and St Quintin and Woodlands Neighbourhood Forum
www.stqw.org

[REDACTED]
Sent from [Mail](#) for Windows 10



Neighbourhood Planning
Westminster City Council

Our ref: PL00160146

By email: neighbourhoodplanning@westminster.gov.uk

7th February 2018

Dear Sir/Madam,

Knightsbridge Neighbourhood Plan Regulation 16 draft (November 2017)

Thank you for consulting Historic England on the latest draft of the Knightsbridge Neighbourhood Plan. The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more proactive 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 is affected by the Plan.

As Historic England's remit is to advise on proposals affecting the historic environment our comments relate to the policies and projects in the draft Plan that relate to heritage. These comments are in addition to the advice we provided on 13th May 2015, 14th February 2017, 8th June 2017 and 21st September 2017.

Historic England welcomes the creation of this Plan and the ways that it seeks to engage with, and enhance, the local historic environment as well as some of London's most well-known and best loved heritage assets. We welcome the changes that have been made to the Plan to take on board our comments, notably around the tall buildings policy. Given the fundamental contribution that the historic environment makes to the character of Knightsbridge, recognised through the conservation area designations covering much of the neighbourhood area and the numerous listed buildings, we particularly welcome the inclusion of heritage among the main policy objectives, and as a consideration within other policy areas covered by this document.

Conclusion

We trust this advice is of assistance in the preparation of your Plan. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment.





Historic England

Yours sincerely,

str
c
ct
:
[Redacted signature]

David English
Historic Places Principal London

[Redacted contact information]



[Redacted footer text]



From: Maggie Baldwin
Sent: 08 February 2018 09:19
To: Neighbourhood, Planning: WCC
Subject: FW: KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

From: Maggie Baldwin
Sent: 08 February 2018 09:14
To: 'neighbourhoodplanning@westminstergov.uk' <neighbourhoodplanning@westminstergov.uk>
Subject: FW: KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

From: Maggie Baldwin
Sent: 08 February 2018 08:58
To: 'neighbourhoodandplanning@westminstergov.uk' <neighbourhoodandplanning@westminstergov.uk>
Subject: KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

Dear Sirs

My husband, Robert Baldwin and I live at _____ and are fully in support of the Knightsbridge Neighbourhood Forum Plan. We are local residents who are concerned that the character and quality of the area must be maintained, that standards should not be allowed to fall, consideration must be given to our parks, roads and pedestrian areas. Development has to be closely monitored and residents must feel comfortable and safe in the environment in which we reside.

Yours sincerely

Margaret Baldwin [Mrs]

Neighbourhood Planning
City of Westminster
63 Victoria Street
London SW1E 6QP

7 February 2018

Dear Sirs,

Knightsbridge Neighbourhood Plan

I would like to record and confirm my support for The Knightsbridge Neighbourhood Plan. I consider that this document is a very important step in ensuring that Residents of Knightsbridge have an opportunity to bring together in one place matters which are important to them, particularly in the longer term and especially in aspects of Planning. I consider that the Neighbourhood Plan puts forward sensible policies on the issues identified and how they can be addressed.

Having declared my overall support for the Plan, as a resident for some 25 years, there are certain parts of the Plan on which I would like to expand my support, see below.

KBR6 Local Buildings and Structures of Merit

The unlisted buildings and structures that are described here are part of the patina of Knightsbridge and as such should be preserved and protected.

KBR7 Tall Buildings

The London skyline has, over the last few years, been disfigured by architect's "trophy" buildings. The human aspect of city life is overpowered by these building and, with the exception of the Barracks, Knightsbridge has not been affected by any unsightly tall buildings and I believe that it is important for this to continue

KBR9 Advertising

There has been an increase in adverts on Bus Stops and also there are proposals for telephone boxes which are effectively a means of introducing advertising hoardings onto the street as the phone function is effectively redundant. This needs to be strongly controlled or hopefully stopped.

KB14 Hyde Park Barracks

The rumours of developers being allowed to demolish and replace the Barracks with, probably, another over the top development similar to No. 1 Hyde Park is unacceptable. One Hyde Park is a classic example of a gross development that contributes little or nothing to the area. When viewed from Sloane Street at dusk you are frequently able to see only one or two of the apartments with lights on!

KBR15 Neighbourhood Stress Areas

In what was a relatively a relatively quiet area, over the last few years, a change has taken place, which appears to be continuing, which has resulted in traffic congestion, loitering, excessive rubbish etc. We do not want Knightsbridge turned into a Stress Area like Soho.

KB19 Protection of Public Houses

It is rather sad that over the last 10-15 years public houses have been closed, demolished or turned into residential properties e.g. The Tea Clipper, The Swag & Tails, The George IV. The few remaining Public Houses should be effectively "Listed" buildings.

KB25 Construction Activity

Over the last 10 years or so in what was a relatively quiet residential area there has been a host of major residential re-builds, with basement dig outs being a major part of this. The construction activity involved with this, the noise, dirt, traffic disruption has had a bad effect on resident's health and amenity. In Trevor Place there has been some 17 of these developments which has meant that this has been an almost continuous building site for some 10 years

KB35 Healthy Air

The high levels of pollution that occurs, on the Brompton Road for example, are a matter of concern. The particulate levels that are being reached are very worrying and steps by Westminster and TFL to reduce these are very important.

KBR39 Trees

The life of trees and particularly the plane trees that are an essential part of the fabric of the environment needs to be considered in the longer term and planned for.

Developer Contributions

I strongly support the suggestions for Developer Contributions which go some way towards ameliorating the adverse effects on Resident's amenity that inevitably result from almost all developments

Neighbourhood Management Plan

The need for this structure, assuming that the Neighbourhood Plan is accepted, is extremely important as it will ensure that there is continuity. The tasks that the Forum will undertake are essential in ensuring that the Plan is a live, ongoing Plan. For example the Forum should be consulted on such topics as major infrastructure developments.

Yours sincerely

Robert Morris

From: Charles Coghill
Sent: 08 February 2018 16:37
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan - Submission (Regulation 16) Consultation

Dear Sir / Madam,

I am writing in support of the Knightsbridge Neighbourhood Plan.

I have been working in Knightsbridge for the last year and have previously lived within the Borough. While some measures have been put in place it is still evident that there is an increasing problem with air pollution (idling cars) and the speed some people use to drive through the area.

Yours faithfully,

Charlie Coghill
Resident Services Manager
Knightsbridge Residents Management Company Limited

W: www.theknightsbridge.com

From: MELVILLE HAGGARD
Sent: 08 February 2018 21:10
To: Neighbourhood, Planning: WCC
Subject: KNIGHTSBRIDGE NEIGHBOURHOOD PLAN - RESPONSE TO S16 CONSULTATION

Dear Sirs

We are writing in response to the above and **to confirm our support for the Knightsbridge Neighbourhood Plan.**

Part 1 of the Plan identifies a number of important policies designed to support the infrastructure, public realm, environment and well being of Knightsbridge residents and businesses over the next twenty years. We strongly support the Plan's Vision, Values and Objectives as set out in Part 1, page 15.

Referring to specific policies, we comment as follows:-

KBR14: we support the continued operation of Hyde Park barracks in its current form but if it were to be redeveloped we would not want to see any increase in height or massing across the site. The barracks was located here for the purpose of deploying troops in the event of civil unrest an event as likely today as it ever was. The Household Cavalry is also a prominent feature in the life of the Knightsbridge community.

KBR15: Knightsbridge / Brompton Road has become a stress area and we strongly support the KBR15 policy statement along with measures set out in Part 2 Neighbourhood Management Plan aimed at curbing the effect of Licensing regulations that take no account of cumulative impact - please refer to Part 1, page 38, paragraph 4.2 and Part 2, page 12, Objective 4.0.

We support KBR35 and believe that it should be mandatory for all new waste management contracts or extensions of existing contracts to require that refuse collection vehicles ("RCV") used to service such contracts in the KNF area (and beyond) are powered by LNG, CNG or electricity (when appropriate battery technology becomes available).

We support all the other Policies in the Plan.

Yours faithfully

Mr and Mrs M Haggard



KNP44

Royal Commission for the Exhibition of 1851



8 February 2018

Neighbourhood Planning, Policy and Strategy
Westminster City Council
6th Floor
5, The Strand
London
WC2N 5HR

Dear Sir/Madam

Regulation 16 Knightsbridge Neighbourhood Plan Consultation

I am writing on behalf of the Royal Commission for the Exhibition of 1851 to express our support for the Knightsbridge Neighbourhood Plan.

The Plan with its supporting documents sets out very clearly a vision for Knightsbridge for the next twenty years and strikes a nice balance in acknowledging the needs of its constituent entities.

The determination, expressed in Section 6, to stay true to Prince Albert's vision for the cultural quarter is particularly welcome. In 1852-56, following the success of the Great Exhibition and with the encouragement of the Prince Consort, the Commissioners purchased 87 acres of largely green field land (see plan attached) and over the next one hundred years or so encouraged and facilitated the creation of the cultural quarter known as Albertopolis, which today comprises museums and educational institutions that are all world leaders in their own right. Roughly half of the cultural estate lies within the area of the Knightsbridge Neighbourhood Plan and the acknowledgement that institutions such as Imperial College, the Royal Colleges of Music and Art and the Royal Albert Hall all need to develop their facilities over time to retain their world leading status is an important element of the Plan's objectives. The needs of those living in residential properties that have also been built on and around the legacy estate over a similar period must, of course, be taken into account as well and the Plan makes this intention clear.

2/...



Equally, the priority given to supporting the proposal to improve connectivity between the Albert Memorial and the Royal Albert Hall with funds from the Commercial Infrastructure Levy is very welcome.

Overall the Plan is well balanced and comprehensive and the Commission is delighted to confirm its strong endorsement.

Yours faithfully

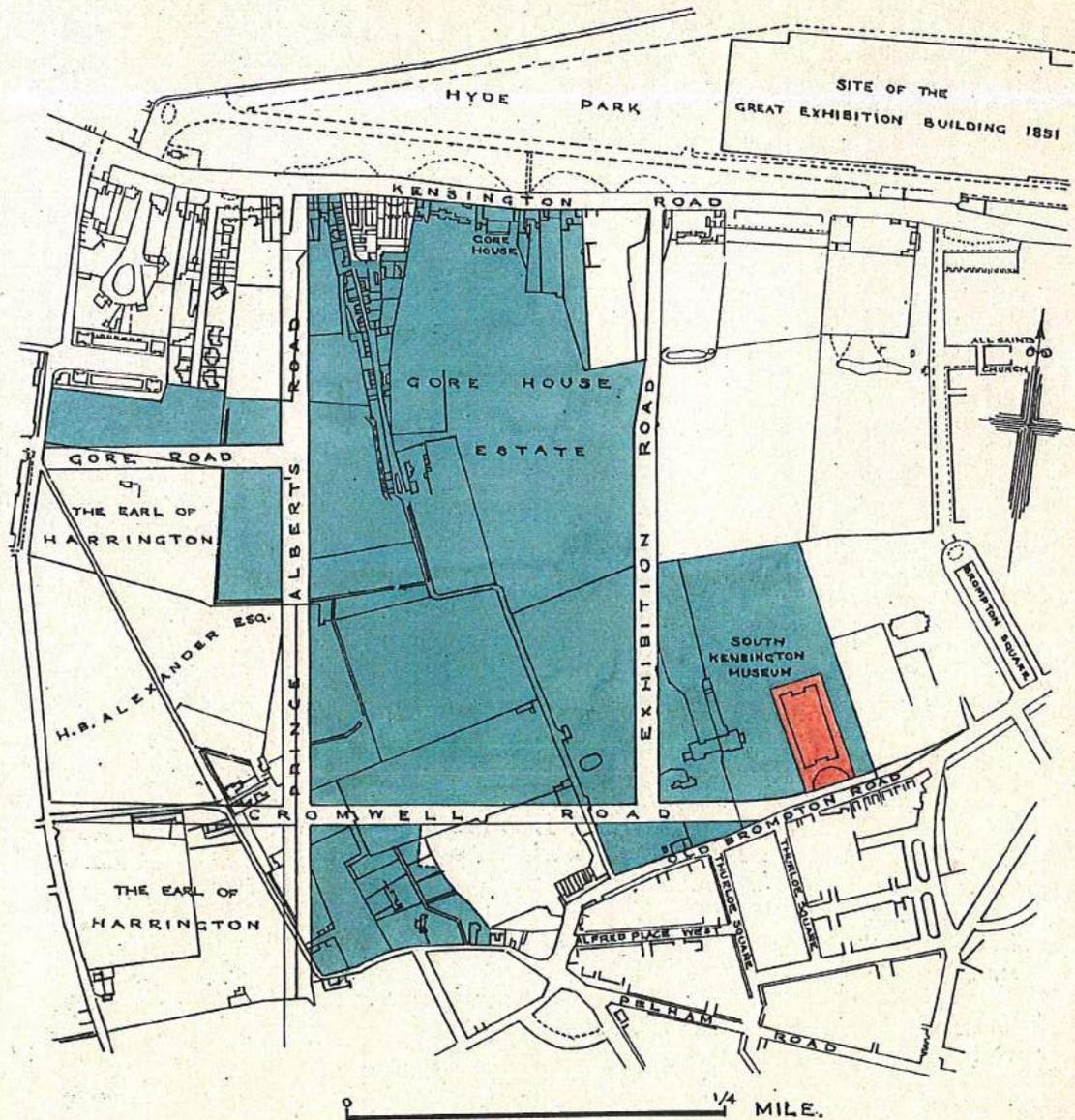


Nigel Williams
Secretary

Enclosure: Estate Plan 1852-56

KENSINGTON GORE ESTATE
OF THE
COMMISSIONERS FOR THE EXHIBITION OF 1851.

1852-56



This plan shows how the original property of the Commissioners was opened up by the formation in 1856 of the different roads intersecting the Estate and extending over $1\frac{3}{4}$ miles, viz. Exhibition Road, Cromwell Road, Prince Albert's Road (Queen's Gate) and Gore Road (Queen's Gate Terrace). The South-Eastern part of the estate, now divided by Exhibition Road from the 'main square', was appropriated in 1856 for the purposes of the Department of Science and Art, which had, since 1853, utilised Gore House and other buildings on the estate for various educational purposes. The plan also indicates on this same area the position of the Department's original Museum of Science and Art. In 1856 part of the wedge-shaped property in Gore Lane was being acquired by purchase from various owners under Act of Parliament; the rest was acquired by exchange in 1863.

KNP45



KNIGHTSBRIDGE NEIGHBOURHOOD PLAN – SUBMISSION (REGULATION 16) CONSULTATION: BESA SUBMISSION

Consultation Submission: 08.02.2018
From: The Building Engineering Services Association
neighbourhoodplanning@westminster.gov.uk

The Building Engineering Services Association (BESA) has had long term interests in both renewable energy systems and air quality issues. Our members design and install systems that deliver either zero or low carbon energy solutions, that operate within integrated systems. They also install and maintain systems that maintain optimum air quality within buildings. Current research has established links between good air quality and wellbeing. Within schools the monitoring of carbon dioxide levels has led to improved performance from pupils. The BESA therefore fully supports the proposals within the Knightsbridge Neighbourhood Plan and considers this an exemplar of good practice for neighbourhood planning.

The plan will focus developers on meeting target energy and carbon levels by the implementation of CIBSE document TM54. As the document states "This guidance will help to turn low energy designs into low energy buildings that achieve the design energy targets." According to a recent Carbon Hub Report building can use between 200 and 400% more energy than designed. The use of TM54 will ensure that the promise a developer makes at planning stages will be delivered in the completed project. A building that meets the energy performance target through the combination of good design, construction of the fabric and the development of integrated building services will be more likely to meet other requirements such as fire safety. The holes that energy escapes from are the same holes fire and smoke pass through. This will help deliver safe buildings that perform; an essential requirement of the interim report from Dame Judith Hackitt following the Grenfell Fire.

The development of building regulations post Grenfell, will inevitably lead to greater scrutiny of fire safety within buildings. As buildings become safer for occupiers, through the adherence to greater air tightness there is a danger that ventilation systems will continue to be poorly designed and maintained. A sealed building needs properly designed and installed ventilation to prevent health issues in future years. These ventilation systems need to take into account ambient air conditions and filter external air to provide occupiers with clean safe air to breathe. As we spend up to 90% of our lives inside buildings they should become "safe havens" for occupiers and residents. Poorly designed and installed systems can make the situation worse, combining external air pollution with internal pollutants such as Volatile Organic Compounds VOCs given off by paints, carpets or cooking pollutants. A potentially lethal cocktail with a disproportionate impact upon children, the elderly and infirmed.

The technologies and skills to deliver systems that create a "safe haven" are commercially available in the market. They are not always used in buildings because developers are not required to install these systems and derive no benefit from the application. The benefit is felt by residents and occupiers long after the developer has sold their interest in the property. The Knightsbridge Neighbourhood Plan represents an opportunity to develop an area in the city that truly benefits the residents and those that work there. It is a model for sustainable growth that protects citizens from the impact of development and is therefore whole heartedly supported by BESA.

The Building Engineering Services Association is the UK's leading trade organisation for building engineering services contractors – representing the interests of firms active in the design, installation, commissioning, maintenance, control and management of engineering systems and services in buildings. BESA cover a broad range of engineering, design, installation and facilities management activity, including electrical, heating, plumbing, energy management, micro-generation, ductwork, ventilation, fire and security, and wireless systems.

Joint working includes representation and services in key areas such as contracts, procurement, payment and health and safety. Overall, the engineering services sector is estimated to account for some 40 per cent of UK construction and maintenance turnover.

From: Ali Al Ramahi
Sent: 09 February 2018 15:59
To: Neighbourhood, Planning: WCC
Subject: Neighbourhood Consultation

Dear Sir/Madam,

I have been working in the Knightsbridge area for a decade and I am writing to confirm my support for the Knightsbridge Neighbourhood Plan. I believe it identifies the most important issues in Knightsbridge and proposes sensible policies to address them. I also support the proposed Neighbourhood Management Plan in Part Two. Thank you very much.

Regards,

Ali

Ali Al Ramahi, Director
Optimum Health And Sports Performance Ltd

W: www.ohsp.co.uk

From: Amanda Frame
Sent: 09 February 2018 18:16
To: Neighbourhood, Planning: WCC Knightsbridge
Subject: Draft Neighbourhood Plan

I write for the Kensington Society to express our support of those policies and aspects of the Draft NP which have good evidence of support from residents within the neighbourhood area, however, this support is with reservations on policies which could impact outside the neighbourhood area and which do not strike the right balance between the aspirations of the museums and its lobbying body, the Exhibition Cultural Group, and the daily quality of life of existing residents and the locals within the area particularly within RBKC. There are no boundaries, no walls which divide the Forum area from outside its boundary and the effects of some of the recommended policies must be considered in light of their apprehensions.

We do have concerns that some proposals are in conflict with Westminster planning policies and, in particular, the emerging London Plan, now in draft form. The area is outside RBKC but as noted there are no boundary walls, the effect on RBKC must be material.

Exhibition Road is approximately half in Westminster and half in RBKC. We have fears that the Forum policies direct the use of the entire road, sanctioning unlimited numbers of events and changes from increasing size of the pavement to narrowing the road and effecting traffic flow. RBKC has the majority of the major museums with the most visitors, while the Forum area is primarily land use the Imperial College with evening Royal Albert Hall. The Forum's encouragement for increase in uses and diversity in the type of users, extension of hours for eating establishments from street, restaurants and entertainment developments within their limited institutions but encouraged beyond, will have an adverse effect on the entire area and in particular the RBKC residents. The uses of the road is control via Key Decision and variation to the Key Decision is not a Neighbourhood Plan prerogative.

We have expressed our concern to the Forum during consultation and will again here that the unrealistic proposal to restrict development to cultural and educational development and only three residents for such use, key-workers, is uncontrollable. Aspirational but unworkable with the shortage of housing throughout the area.

Amanda Frame, chairman of the Kensington Society
www.kensingtonsociety.org

Representation in relation to the Knightsbridge Neighbourhood Plan

Matthew Bennett MBE on behalf of the Soho Society.

I have lived in Soho since 1968 and involved in the Soho Society since its inception in 1974 and have chaired its Planning and Environment Committee for more than 20 years. I travel to and through Knightsbridge quite regularly.

I welcome and support the work of the Knightsbridge Neighbourhood Forum in producing a neighbourhood plan for the Knightsbridge area. I support the approach and objectives of the plan overall and make the following additional points in relation to particular policies.

KBR1 Character, Design and Materials

I agree that assessing character and context is vital in ensuring good design and that high-quality materials although possibly more expensive will be likely to ensure a longer life for a development which helps to contribute not only to its aesthetic appeal but also its overall sustainability.

KBR7 Tall Buildings

I fully support the approach taken and feel that in historic areas of central London their character would be substantially eroded if tall buildings are allowed particularly those which do not respect local context and character. This is particularly important in conserving the character of a conservation area and the importance heritage assets to the West of the area.

KBR11 Urban Greening

I strongly support these policies as central London faces a number of challenges in relation to the heat island effect, poor air quality and stress to the health and wellbeing of people living in intensely used city areas. Studies in relation to urban greening have demonstrated beneficial effects in relation to each of these issues and also helps to sustain wildlife.

KBR11 Neighbourhood Stress Area

I strongly support these policies and in particular section C. It is important that development proposals take greater responsibility for the external adverse impacts of their activities and think through what these might be before applying for planning consent and set out how they will mitigate them so that any consent can be conditioned accordingly.

KBR22 Household and Commercial Waste

I support these policies but would go further than encouraging them and in relation to commercial waste would urge that all developments should make provision not just for the storage of waste but for the separation of different material streams for recycling and that proposals which do not contain adequate facilities should be resisted.

KBR31 Motor Vehicle Use

I support this approach but also feel that stronger support should be given to freight consolidation in the light of increased congestion caused by small van deliveries often caused by internet shopping. For example, it may be possible to identify locations for lockers for a 'click and collect' system where goods are delivered to lockers rather than an individual home or business. Or sites might identified which could be used for micro consolidation centres where freight is consolidate for 'last mile

delivery' by electric vehicle, bicycle or on foot. This will also help to reduce congestion and improve air quality.

KBR35 Healthy Air

These policies are of huge importance not just for Knightsbridge but across central London. Polluted air adversely affects not just local residents and employees but also visitors and shoppers and has been shown to lead to significant numbers of premature deaths.

KBR36 Renewable Energy and KBR 37 Retrofitting

I support these policies but would like to see greater emphasis on achieving cooling through natural ventilation where possible but where this is not feasible building in energy efficient cooling systems as an integral part of a development. As climate change has increasingly produced hotter and more humid weather cooling systems are often introduced as an after thought and are often energy inefficient, badly maintained and noisy.

KBR39 Trees

I strongly support the retention of trees both in the policy and as amplified in Appendix E supplemented by additional planting wherever possible. Where the issue of roots interfering with underground pipework and services is an issue it may be possible to plant smaller tree species in containers as a viable alternative.

KBR41 Healthy People

I support these policies and in particular section B which addresses noise nuisance. One aspect of this which the policy might address is the pressure from logistics companies and from the GLA to increase 'out of hours deliveries'. Whilst in some locations this may be possible and acceptable deliveries late in the evening and in the early morning are a regular source of noise complaint from residents. The plan might wish to restrict deliveries in the neighbourhood area to certain hours or prevent deliveries between certain hours as the forum decides.

M Bennett 9.2.18

From: Dominic Fee
Sent: 10 February 2018 20:16
To: Neighbourhood, Planning: WCC
Cc: Westminster Cycling Campaign
Subject: Re: Knightsbridge Neighbourhood Plan - Regulation 16 Consultation

Dear Sean,

I am writing on behalf of Westminster Cycling Campaign, the local group of the London Cycling Campaign. We aim to encourage people to cycle, improve conditions for cycling and raise the profile of cycling in Westminster. Thank you for inviting us to comment in the Submission (Regulation 16) Consultation on the Knightsbridge Neighbourhood Plan. We would like to be notified of Westminster City Council's final decision in relation to the Plan. Could you please confirm receipt of this representation?

Draft London Plan 2017 explains, more clearly than we could, that "10.1.1 The integration of land use and transport, and the provision of a robust and resilient public transport network, are essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way. In order to help facilitate this, an integrated strategic approach to transport is needed, with an ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use, London cannot continue to grow sustainably.

10.1.2 A shift from car use to more space-efficient travel also provides the only long-term solution to the road congestion challenges that threaten London's status as an efficient, well-functioning globally-competitive city. Reliable deliveries and servicing, and easy access to workplaces and key attractions are dependent on an increasingly-efficient transport network. Roads will continue to play a vital role in this, and greater priority needs to be given to making them more efficient for those activities that depend on them the most."

Its Policy T1: Strategic Approach To Transport states:

"A Development Plans and development proposals should support:

1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041".

Its Policy T6: Car Parking requires that new development in the Central Activities Zone is car-free

The previous London Plan 2016 explains that "6.33 The Mayor is committed to delivering a step-change in cycling provision that will support the growing numbers of cyclists in central London as well as encourage growth in cycling across all of London. The Mayor's aim to increase the mode share for cycling to 5% across Greater London will require significant increases in particular areas and for particular trip purposes – e.g. Central, Inner and mini-Hollands, leisure trips across the capital and commuting trips to Central London."

Its Policy 6.9: Cycling states:

"Strategic

A The Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least 5 per cent of modal share by 2026. He will:

a identify, promote and implement a network of cycle routes across London which will include Cycle Superhighways and Quietways

b continue to operate and improve the cycle hire scheme

c fund the transformation of up to four outer London borough town centres into cycle friendly 'mini-Hollands'.

Planning decisions

B Developments should:

a provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions)

b provide on-site changing facilities and showers for cyclists

c contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable and in line with the guidance set out in the London Cycle Design Standards (or subsequent revisions)

d provide links to existing and planned cycle infrastructure projects including Cycle Superhighways, Quietways, the Central London Grid and the 'mini-Hollands'

e facilitate the Mayor's cycle hire scheme through provision of land and/or planning obligations where relevant, to ensure the provision of sufficient capacity."

In the draft Knightsbridge Neighbourhood Plan we do not see this "ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use." Policy KBR29: Pedestrians Within The Movement Hierarchy that states "H. Any development proposal which enhances the safety or provision of Advanced Stop Lines for cyclists on Brompton Road or other Main Roads is encouraged" demonstrates faint support for cycling infrastructure and falls far short of "providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable".

In the draft Knightsbridge Neighbourhood Plan we do not see tangible policies that would support "the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041". Policy KBR31: Motor Vehicle Use states that "A. In line with the London Plan Policy 6.13, all new development, and particularly that of Level 3 or larger (as described in Appendix G), is encouraged to be motor vehicle-free with the exception of designated parking for Blue Badge holders." Given that Knightsbridge is in a highly accessible location in London's Central Activities Zone, we believe that for the Knightsbridge Neighbourhood Plan to meet the Basic Condition of contributing to the achievement of sustainable development, motor vehicle-free development should be a requirement rather than an encouragement (again with the exception of Blue Badge).

We respect the effort put into Neighbourhood Plans by Neighbourhood Forums and we had hoped that this new local level would move policy forward. In this case we are surprised and disappointed that the Knightsbridge Neighbourhood Plan appears regressive, including in comparison with its pre-submission version. We fear that the existence of such policies in Knightsbridge would make it difficult to attract funding from bodies such as Transport for London to the local area. We challenge whether the Knightsbridge Neighbourhood Plan conforms with policy such as the London Plan and whether contributes to the achievement of sustainable development.

Yours sincerely,

Dominic Fee

Secretary, Westminster Cycling Campaign

The local group of the London Cycling Campaign

From: "Neighbourhood, Planning: WCC" <neighbourhoodplanning@westminster.gov.uk>

To:

Sent: Wednesday, 20 December 2017, 13:51

Subject: Knightsbridge Neighbourhood Plan - Regulation 16 Consultation

From: Adrian Stickley
Sent: 11 February 2018 12:00
To: Neighbourhood, Planning: WCC
Subject: Planning for Knightsbridge

I wish to support the proposals of the Knightsbridge Association.

I have lived in Knightsbridge for fifty years -as a "Village" it has all but disappeared.

Montpellier Street is permanently littered with debris from Cafes and take aways.Adding chairs and tables at 1 to 3 would only add to the rubbish and healthhazards:rats in particular.

The erection a flower shop is even more objectionable: crossing Montpellier Street is already difficult,with traffic from Brompton Road making it perillous.A flower kiosk would add to the lack of visibility.

When Planning in this very busy area,please consider the welfare of an ageing population and our needs for safety.

Thank you.

From: Mrs Pollitzer

From: Shahram Amir-keyvan
Sent: 11 February 2018 12:03
To: Neighbourhood, Planning: WCC
Subject: Forum's presentation

I support the forum's presentation to the council.

Kind regards,
Shahram Amir-Keyvan