

KNIGHTSBRIDGE
NEIGHBOURHOOD
FORUM

FAO Sean Walsh
Neighbourhood Planning
Policy and Strategy
Westminster City Council
6th floor
5 Strand
London WC2N 5HR

By email to neighbourhoodplanning@westminster.gov.uk

12 February 2018

Dear Sean and Andrew

Consultation on Submission Version of the Knightsbridge Neighbourhood Plan (Regulation 16)

I am writing on behalf of the Knightsbridge Neighbourhood Forum (Forum) to make representations in response to the Regulation 16 consultation. This is the first of a number of submissions by the Forum.

The Forum has identified a number of minor erratum items in several of the documents submitted in November 2017. In the interests of transparency, it is submitting a list of proposed corrections in the attached schedule with a request that they be agreed by Westminster City Council and the Planning Examiner (when appointed) before the Knightsbridge Neighbourhood Plan is next published.

Please contact me if you have any questions.

Yours sincerely

Simon Birkett
Chair

Enclosure.

KNIGHTSBRIDGE NEIGHBOURHOOD PLAN

Submission documents – Minor erratum as at 12 February 2018

ALL DOCUMENTS	
Check final page numbering in ‘Contents’ and ‘List of Policies’	As required
PART ONE	
Document, paragraph number or other	Change required
Various polices	Lists labelled ‘a’, ‘b’, ‘c’, etc that follow main lists (i.e. ‘A’, ‘B’, ‘C’, etc) should be indented
Figures – throughout	Figures and photos should be centralised
p.2 Policy KBR12	Uppercase ‘Local Green Spaces’
p.4 Summary, third paragraph, last sentence	Amend tense of sentence to read ‘The Plan was then subject to...’
p.8, para 0.4, first line	Colon after ‘themes’
p.16, para 0.35 (ii), first line	Delete ‘that’
p.18, adjacent to table	Take off ‘1’ and ‘1.1’ from beside the table
p.20, top	Move conformity reference to underneath policy on p.19
p.26 Policy KBR8 C, first line	Check font size and spacing of words
p.31, Figure 4	Enlarge figure to make it more readable
p.32, Policy KBR13 A, first line	Insert ‘(MOL)’ after ‘land’. Uppercase ‘Land’
p.44, top	Move conformity reference to underneath policy on p.43
p.44, para 4.15, fourth line	Change ‘Paxton Head’ to ‘Paxton’s Head’
p.50, para 6.01	Move para 6.01 below the Box
p.54, Policy KBR33 in table	Change ‘Public Transport’ to ‘Public transport’
p.54	Slightly bigger gap after table and ‘Objective 7.0’
p.62, top	Move conformity reference to underneath policy on p.61
p.67, para 10.8, sixth line	Insert ‘in concentration’ after ‘increase’
p.68, conformity reference	Gap following policy is too large
p.69, para 10.12, third line	Change ‘onsite’ to ‘on-site’
p.69, para 10.15, first line	Change ‘environment’ to ‘environmental’
p.71, para 10.21, fourth line	Change ‘on site’ to ‘on-site’
p.72, KBR39 D, third line	Change ‘otherwise’ to ‘elsewhere, in all cases’ and insert comma after ‘five years old’ to reduce potential ambiguity
p.74 KBR41 B e, fourth line	Change ‘users’ to ‘uses’
p.77, 10.33, fourth line. Conform to Part Two of the Plan, para 2.8 on p.6	Amend third sentence to ‘This community therefore has a right to be properly consulted in the decision-making process.’
p.77, 10.33, last sentence. Conform to Part Two of the Plan, para 2.8 on p.6	Change final sentence to ‘The Forum expects to be consulted on such proposals and, where appropriate, to respond or object accordingly.’
p.79, Policies maps	Amend map. Imperial College Road is not a Local Road
p.82, definition of Forum, last line	Uppercase ‘Local Planning Authority’

p.82, definition of Knightsbridge Neighbourhood Plan, second line	Reverse 'the in' to 'in the'
p.82, definition of Local Roads	Insert 'the' before 'network'
p.83, definition of Paris Agreement, second line	Change 'gases' to 'gas'
p.83 definition of Primary Shopping Frontage	Full stop at end of sentence
p.85, first line	Change United Nation's to United Nations
p.87, para C2.2, third line	Change 'Policies Map' to 'Policies Maps'
p.89, para C6.1, first line	Insert 'the' before 'site'
p.91, Appendix D	'D1.0' should be moved down to be prior to 'Walking' heading
p.91, Appendix D, D1.0, item 'i'	Change 'junctions' to 'locations'
p.91, Appendix D, D2.0, item 'a'	Change to 'implementation and/or improvement'
p.101, H2.0, item c	Upper case 'Tree Management Plans'
PART TWO	
Document, paragraph number or other	Change required
Figures – throughout	Figures and photos should be centralised
Cover page and page 'header'	Change title from 'Neighbourhood Management Plan' to 'Knightsbridge Management Plan' since that is how it is referred to within Part One. Amend page header similarly throughout
p.9, KBR3 in Policies column	Full stop after 'walls'
p.10, KBR7 in Lead/partners column	Change 'KNF' to 'Forum'
p.11, action 14	Change 'and outline' to 'an outline'
p.11, KBR13, Objectives column	Change 'Land' to 'land'
p.11, KBR13, Policies column	Insert full stop after 'Land'
p.12, KBR15 and KBR17 in Policies column	Insert full stop after 'Area' and 'measures'
p.15, KBR25	Insert full stop after 'buildings'
p.16, Action 39	Change 'Cycle Superhighway 3' to 'Cycle Superhighway 10'
p.19, Action 61	Change 'ResPark' to 'Respark' twice
p.19, Action 62	Change 'WWC' to 'WCC'
p.20, Action 64	Change 'ResPark' to 'Respark'
p.21 KBR38	Insert full stop after 'environment'
p.21, KBR39	Insert full stop after 'Trees'
p.22, KBR42	Insert full stop after 'people'
p.23, Project 15	Upper case 'Tree Management Plans' and 'Tree Management Plan'
PART THREE	

Document, paragraph number or other	Change required
Figures – throughout	Figures and photos should be centralised
p.4, para 1.6, fifth line	Change ‘185’ to ‘1851’
p.4 para 1.6	Last two words ‘Character Areas’ should be capitalised
p.6 para 1.7, seventh line	Delete stray bracket after ‘Albert Gate CA’
p.8 para 1.14, second line	Insert ‘does’ after ‘(Signs and advertisements)’
p.8 para 1.14, third bullet point	Delete stray bracket after ‘energy efficiency’
p.22. Post Box A, Description	Full stop at end of ‘Description’ i.e. after ‘recognisable’
p.25 Figure 2	Heading consistency
p.27 caption to second photo	Amend to ‘Ennismore Gardens Mews’
p.27 para 1.40 second line and caption to third photo	Change to ‘Prince’s Gate’ in two places
p.28 Photo 1	Prince’s Gate (needs an apostrophe)
p.32, para 2.6, second line	Change ‘accidents’ to ‘collisions’
p.32 2.6 Figures 3 and 4	Heading consistency
p.33, para 2.7, first line	Change ‘accidents’ to ‘collisions’
p.35, para 2.16, third line	Delete ‘to’ after ‘one’
p.35, para 2.18, first line	Change ‘Princes’s Gardens’ to ‘Prince’s Gardens’
p.36 Footnote 6	Correct link to http://www.melbourne.vic.gov.au/SiteCollectionDocuments/urban-forest-strategy.pdf
p.38 Figure 5	Heading consistency
p.41, penultimate box	Correct apostrophes to ‘Prince’s Garden’ and ‘Prince’s Gate’
p.45 Figure 6	Heading consistency
p.46 numbering	Current para 3.9 sentence should follow on at end of para 3.8 and para 2.33 should be new para 3.9
p.47, para 3.14, fifth line	Change ‘state’ to ‘State’
p.47 and 48 subheadings	And ‘Heritage and Use of National Importance’ and ‘Legal Restriction’ – one is in italics, the other isn’t
p.49	Numbering – The 4 needs to be against the heading at the top of the page
p.49, para 4.2, seventh line	Insert ‘and commercial uses’ after ‘residential amenity’
p.49, para 4.4, fourth line	Insert ‘and’ between ‘day’ and ‘well’
p.51, para 4.4, third and fourth lines	Change ‘accidents’ to ‘collisions’ in two places
p.51, Figure 7	Heading consistency
p.51, para 4.16, sixth line	Delete ‘in’ after ‘were’
p.52, para 4.21, first line	Change ‘street’ to ‘streets’
p.55, para 4.33	Change comma to ‘and’ before ‘conforms’
p.55, Sub-objective 4.2	Move three lines to top of next page
p.56, para 4.37	Figure referred to should be 9 not 8
p.58, para 4.42	Change caption of photo to ‘Paxton’s Head and Tattersalls Tavern’
p.59, para 4.47	Delete rogue full stop at end
p.60, para 4.49, last sentence	Follow on to previous sentence.
p.60, para 4.51, third line	Change ‘part of’ to ‘part or’
p.61, para 4.53, first line	Change ‘constraints’ to ‘appropriate consultations’
p.61, para 4.54	Delete the rogue apostrophe before Compod
p.61, figure 10	This Figure looks a bit blurry
p.62, para 4.57	Figure 4.4 should read ‘Figure 10’

p.62, para 4.58, third bullet	Change 'to be minimised' to 'should be minimised'
p.62, final subheading	Move on to the next page
p.67, para 6.6, fourth line	Change to 'entertainment and exhibition'
p.74 numbering	The 7 needs to be next to main heading
p.74, Figure 13	Imperial College Road is not a Local Road
p.76 para 7.4, second line	Delete 'proposed'
p.84 numbering	Insert an '8' before main heading
p.85, para 9.4 and caption to photo	Change 'Princes's Gardens' to 'Prince's Gardens' in two places
p.88 numbering	'10' needs to be next to main heading
p.95, para 10.37, fourth line	Change 'increased' to 'increases'
p. 96, para 10.42 first line	Change 'show' to 'shown'
p.96, para 10.44 last line	Reverse full stop and comma
BASIC CONDITIONS STATEMENT	
Page number, paragraph number or other	Change required
Headings	Seem to be in a bigger bold than the other documents. Conform
p. 3, para 1.8	Reference is made to Figure 1 below, but Figure 1 is actually on p.4
p.4, Figure 1	The caption needs to say Knightsbridge Neighbourhood Area (the Area, Neighbourhood Area or KNA) -Knightsbridge Neighbourhood Area comprises the land within the red line.
p.4, para 2.1	Delete the quotations in the brackets – NPPF and PPG
p.5, Table 2.1	In the other documents, table headings are in blue bold. Conform
p.6, Table 2.2	Only first word of table headings should have first letter in capitals
p.6, KBR4 description	Delete hyphen in 'in-keeping'
p.7, KBR8 description	Main Roads should be capitalised
p.8, KBR13 description	Neighbourhood Area should be capitalised
p.9, KBR23 title	Activity should not have capital letter
p.12, para 3.2	Reference '3' should be before the full stop
p.18 numbering	Needs aligning to the correct paras including '4' which should be grey and to the left i.e. 4, 4.1, 4.2 and 4.3
p.18, Table title	The title has shifted into Section 5 (page 32) and is numbered '5'. The title needs to move above the table and be in blue bold
p.20, KBR7 commentary	The sentence "It also conforms with the London Plans requirements that tall..." Should read 'conform to'
p.25, KBR25 Title	Text is repeated – delete repeated text in Policy column
p.32, numbering	Numbering has gone awry. Align to correct paragraphs
p.32, Table 4.1 heading	Heading should be on page 18 i.e. above not below the table to which it refers
p.32, para 5.4 (current)	Text: WCC, in an email dated 9 November 2017, confirmed that it was not altering its position on whether or not the Plan requires a strategic environmental assessment (dated 22 September 2017). Strategic Environmental Assessment should be in capitals in last line

p.33, para 6.1	Delete the “” around the bracketed abbreviations in line 5
CONSULTATION STATEMENT	
Page number, paragraph number or other	Change required
Headings	‘Introduction’ is in caps, but other headings aren’t. The other documents in the suite of eight all have headings in bold throughout, so should conform the Consultation Statement.
Photos	Centralise
p.4 para 2.6	Delete space before footnote 1
p.5 para 2.13	Delete space before footnote 3
p.7 para 2.24	Twitter – word ‘the’ should be capitalised
p.16 para 2.51, last line	Strategic Environmental Assessment should be capitalised.
p.19	Delete para A2.3 and renumber A2.4 and A2.5
p.19 para A3.1	Change ‘Table B2’ to ‘Table A1’
HRA SCREENING REPORT	
Page number, paragraph number or other	Change required
None	None
SEA SCREENING REPORT	
Page number, paragraph number or other	Change required
Cover page	Insert below the date: (Updated 3 October 2017)
SUSTAINABILITY REPORT	
Page number, paragraph number or other	Change required
None	None

KNIGHTSBRIDGE **NEIGHBOURHOOD** **FORUM**

FAO Sean Walsh
Neighbourhood Planning
Policy and Strategy
Westminster City Council
6th floor
5 Strand
London WC2N 5HR

By email to neighbourhoodplanning@westminster.gov.uk

14 February 2018

Dear Sean and Andrew

Consultation on Submission Version of the Knightsbridge Neighbourhood Plan (Regulation 16)

I am writing on behalf of the Knightsbridge Neighbourhood Forum (Forum) to make representations in response to the Regulation 16 consultation. This is the second of a number of submissions by the Forum.

The Forum is submitting examples of three responses received during its Regulation 14 consultation (attached in five documents) that commented on particular aspects of the draft Knightsbridge Neighbourhood Plan published on 8 December 2016. These aspects may be considered further during the forthcoming Examination. These responses include:

- Princes Gate Mews Residents' Association (residents' group outside the Knightsbridge Neighbourhood Area) in Jane Whewell email dated 13 February 2017 with two attachments;
- Royal Borough of Kensington and Chelsea (adjacent local authority) in James Preece letter dated 13 February 2017; and
- Westminster Cycling Campaign (the local group of the London Cycling Campaign) in Dominic Fee email dated 10 February 2017.

The Forum worked hard to address these comments in its Plan before formally submitting it to the City of Westminster on 22 November 2017 and believes the Plan demonstrates a positive direction of travel.

The Forum is also submitting Historic England's letter to the Forum dated 6 October 2017 (attached) in relation to its Strategic Environmental Assessment Screening Report (dated August 2017 and updated on 3 October 2017). Reference to the letter seems to have been omitted in Historic England's current consultation response dated 7 February 2018.

Please contact me if you have any questions.

Yours sincerely

Simon Birkett
Chair

Enclosures

Simon Birkett

From: Dominic Fee
Sent: 10 February 2017 17:38
To:
Cc: Simon Birkett; Colin Wing; Simon Munk
Subject: Re: Knightsbridge Neighbourhood Forum - Pre-submission (Regulation 14) consultation

Sir / Madam,

I am writing on behalf of Westminster Cycling Campaign, the local group of the London Cycling Campaign. Thank you for the considerable time and effort that has gone into producing the Knightsbridge Neighbourhood Plan. We are pleased that when Westminster planners refer these policies they will see the support given by local residents to measures including the Cycle Grid, Cycle Superhighway, Cycle Hire and cycle parking through which the Mayor's Vision of "more women cycling, more older people cycling, more black and minority ethnic Londoners cycling, more cyclists of all social backgrounds" can be achieved in Knightsbridge. Our comments are as follow:

Policy KBR21: Local Retailing and Services:

We are pleased by this policy to support 'local' convenience retailing, banking and post office services that reduce the need to travel.

Policy KBR33: Enabling Active Travel:

Numerical standards for the provision of cycle parking, showers, lockers and changing rooms as part of new developments are the only effective means of improving cycle park provision in Knightsbridge's building stock. The existing building stock has a shortfall in cycle parking provision, which shifts demand to less secure on-street cycle parking, which in turn overflows into unsightly and obstructive locking of bikes to street furniture.

Consequently we recommend that Parts E & F are worded as carefully as possible to avoid any unintentional weakening of Westminster and Mayoral cycle parking standards; in some cases Westminster standards may be higher than Mayoral standards. To avoid unnecessary complication we recommend referring to the London Cycling Design Standards 2014 for design guidance rather than the Cambridge Cycling Parking Guide 2008, given that the Neighbourhood Plan has a hierarchical relationship with Mayoral documents. We recommend amending Parts E & F as follows:

'E. The provision of on-site cycle parking, showers, lockers and changing rooms will be required to be at least be in line with London Plan or Westminster City Council standards, whichever is higher. Applicants are strongly encouraged to exceed these standards. Design should follow the guidance in the London Cycling Design Standards 2014 or any successor document.'

'F. In addition to the required on-site cycle parking, on-street cycle parking in suitable locations where there is a demonstrable need will be encouraged. Developments that receive customers and visitors will need to demonstrate that their short term cycle parking demand will be accommodated. Design should follow the guidance in the London Cycling Design Standards 2014 or any successor document.'

We would be pleased if the Forum would consider how best to apply this policy to refurbishments and other works to existing buildings.

We also suggest amending Part A to add support for larger developments that maximise permeability for pedestrians and cyclists, increasing the convenience of these healthy modes relative to motor vehicles.

Policy KBR34: Movement Hierarchy:

We are pleased by the priority given to healthy, active travel modes.

Policy KBR35: Safe And Quiet Roads:

We are pleased by the encouragement given to developers to propose measures that improve road safety and reduce traffic noise and speeds.

Policy KBR36: Cycling And Walking Infrastructure:

This will be a Neighbourhood Plan approved by a referendum of local residents. We are pleased that when Westminster planners refer these policies for the Knightsbridge Neighbourhood Area, they will see the support given by local residents to measures including the Cycle Grid, Cycle Superhighway, Cycle Hire and cycle parking through which the Mayor's Vision of "more women cycling, more older people cycling, more black and minority ethnic Londoners cycling, more cyclists of all social backgrounds" can be achieved in Knightsbridge. We consider this valuable in combating false assumptions about local residents' opinions and priorities. We are pleased by the encouragement given to developers to contribute towards:

- New and improved cycle routes
- Segregated cycle tracks on Brompton Road – this would be a very valuable direct cycle route on which only physical segregation could achieve safe, attractive cycling provision
- Measures to reduce traffic along Exhibition Road – we recommend clarifying that this objective refers to motor traffic, and omitting the mention of "provision of segregated cycle tracks" which would consequently be unnecessary
- Implementing two-way cycling in one-way streets
- Expanding the Cycle Hire network
- Increasing on-street cycle parking

We encourage particular support for increased on-street, short-term cycle parking around the periphery of the Imperial College Campus such as Princes Gardens where the sports centre is located. We also encourage the Forum to support segregated cycle tracks on Kensington Road / Knightsbridge and Queen's Gate, the latter being an important cycle route between Imperial College, student halls of residence in Chelsea, medical sites at the Royal Brompton and Chelsea & Westminster hospitals.

Policy KBR37: Motor Vehicle Use:

We support strongly the requirement that "A. All new development in the KNA should be motor vehicle-free except for designated Blue Badge spaces." This is entirely appropriate given that Knightsbridge benefits from high accessibility by walking, cycling and public transport. Already 41% of households in Knightsbridge & Belgravia Ward do not own a car, according to 2011 Census data.

In order to show general conformity with Mayoral and Westminster policies, it is worth stating that London Plan Policy 6.13 Parking states "b. in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)" and draft Westminster Walking Strategy highlights reduced-car or permit-free development as an opportunity.

However Policy KBR37 Part A needs to be worded more carefully, for example the word parking is currently not used. We recommend that Part A is amended as follows:

'A. All new development in the KNA will not provide on-site parking for motor vehicles, and occupiers will not be eligible for on-street motor vehicle parking permits.'

Policy KBR38: Electric Vehicle Infrastructure:

Part A refers to "vehicle charging points" ... "at each new motor vehicle parking space" which (unless it refers only to Blue Badge spaces) is in contradiction to the requirement in KBR37 that "A. All new development in the KNA should be motor vehicle-free except for designated Blue

Badge spaces.” We would be grateful the Forum would consider the wording more carefully.

Policy KBR49: Developer Contributions:

We are again pleased by the encouragement given to developers to contribute towards:

- Expanding the Cycle Hire network
- Increasing on-street cycle parking

Part Two: Appendix B Community Infrastructure Levy Priority Projects:

We are pleased by the priority given to cycling in the policies that the Forum sets for developers. But what priority does the Forum give to cycling in its priorities for the 25% share of Community Infrastructure Levy (CIL) money that it spends in consultation with Westminster City Council? Current information is limited and suggests little priority. “Provide ample secure cycle parking” appears seventh in the list of priorities. We are concerned that more capital intensive projects, such as Albertopolis (as hinted by Policy KBR49) or Copenhagen crossings, would take precedence, leaving no money to be spent on cycling.

Westminster’s Cycling Strategy explains the proportion of local residents living in flats is higher than the London average, which increases their difficulty in finding space to park a bike and enjoy this healthy, active travel mode. Our experience as the local cycling campaign group is that the most common requests of local residents are cycle parking and Cycle Hire. These are very positively received by the local community when they are provided, for example the Bike Hangar parking that exists on housing estates in Westminster and will soon be installed on-street in Ilbert Street (<http://www.cyclehoop.com/product/shelters-canopies/bikehangar/>). We request that a set proportion of CIL money, ideally 10% or higher, is ringfenced for provision of additional cycle parking and Cycle Hire facilities.

Thank you for inviting us to comment on the Knightsbridge Neighbourhood Plan.

Kind regards,
Dominic Fee
Secretary, Westminster Cycling Campaign
The local group of the London Cycling Campaign

From: Simon Birkett
Sent: 08 December 2016 11:28
To: Ashok Sinha;
Subject: Knightsbridge Neighbourhood Forum - Pre-submission (Regulation 14) consultation

Dear Ashok and Rachel

Knightsbridge Neighbourhood Plan – Pre-Submission Consultation (Regulation 14)

I am pleased to invite LCC’s views on the Knightsbridge Neighbourhood Forum’s proposals for a neighbourhood development plan and associated documents. I believe it is the first such plan in the City of Westminster.

This is a Pre-Submission Consultation in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended) (attached). The following consultation documents may be found at the link below on the Knightsbridge Neighbourhood Forum’s website:

- Part One: Knightsbridge Neighbourhood Plan, 2017-2036

- Part Two: Knightsbridge Management Plan – proposed actions that are not planning policies
- Part Three: Knightsbridge Evidence Base – supporting evidence for Part One
- Executive Summary and further evidence and related information

<http://www.knightsbridgeforum.org/planning/consultation/>

Please submit your responses to the consultation by email to consultation@knightsbridgeforum.org or post to:

Chris Bowden
Troy Navigus Partnership

Responses must be received by 5.00pm on Wednesday 15 February 2017.

If you do not want your response, including your name, contact details and any other personal information to be publicly available, please say so clearly in writing when you submit your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, this will not be considered as a confidentiality request.

I would welcome an opportunity to meet you or any of your colleagues again to discuss our plan and align efforts (other than 23 January to 8 February inclusive when I am travelling). The Forum is very keen to get detailed comments on policies and actions and support for our plan. After two consultations, the vision, values and objectives and structure are set in stone.

Last but not least I would like to thank Rachel for the support you have given to the Forum thus far. It is much appreciated. You'll see we included all your work in policies (Part One) or the Evidence Base or as Actions in Part Two!

Best.

Simon

Simon Birkett
Chair
Knightsbridge Neighbourhood Forum

Please consider the environment before printing this email.



Historic England

Mr S Birkett
Chair
Knightsbridge Neighbourhood Forum

Our ref: PL00160146

6th October 2017

Dear Mr Birkett,

Regulation 16 Knightsbridge Neighbourhood Plan (2017-2036) Strategic Environmental Assessment Screening Report (August 2017) consultation

Thank you for your letter dated 3rd of October 2017, with an updated version of the draft policy KBR7 on Tall Buildings in Knightsbridge, and associated reasoned justification. Further to our recent conversation and Historic England's letter dated 21st September 2017, which responded to the above consultations, we welcome the opportunity to review the new draft policy and provide you with the following comments.

In our view the revised policy wording is coherent with the Neighbourhood Forum's aspirations as they are set out in the supporting text for the policy and other parts of the Neighbourhood Plan which treat the issue of tall buildings and heritage. We consider that the proposed wording would offer a level of protection to the heritage assets listed (notably in part B.a. and B.c) which is proportionate and appropriate to their significance. This is in line with the policies in the historic environment chapter of the NPPF, and Westminster City Council's current Local Plan policies on tall buildings.

Historic England also considers that the new draft policy, and therefore the Neighbourhood Plan, would not require a full SEA. This is because it is now unlikely to lead to any significant environmental effects that have not already been tested in previous environmental assessments, given the policy framework that the Neighbourhood Plan will be set within.

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 your Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan and encourage you to share it with the local planning authority.





Historic England

Yours sincerely,

David English
Historic Places Principal London



13 February 2017
Please ask for: James Preece

Dear Knightsbridge Neighbourhood Forum,

Comments Pre-Submission Consultation (Regulation 14) of the Knightsbridge Neighbourhood Plan

Thank you for giving the Royal Borough of Kensington and Chelsea the opportunity to respond to the Pre-Submission Consultation (Regulation 14) of the Knightsbridge Neighbourhood Plan.

The Council notes that Part One and Part Two of the Knightsbridge Neighbourhood Plan continue to outline a wider 'area of interest' beyond the tightly defined neighbourhood boundary encompassing areas of the Royal Borough of Kensington and Chelsea. Para ii.18 the Plan states that KNF "would like to see its vision, values and objectives and views given weight in these places by... RBKC".

The Council is very concerned with the principle of a wider 'area of interest' whereby a Neighbourhood Plan's vision, values, objectives and planning policies seek to have weight beyond the defined Neighbourhood Area boundary. Knightsbridge Neighbourhood Area does not fall within the geographic scope of the Royal Borough and will not form part of Kensington and Chelsea's Development Plan. The contents of the Plan have been created by a group that does not necessarily represent the residents of the Royal Borough, has no requirement to consult residents within Kensington and Chelsea and upon which our residents would have no right to vote on whether they accept or reject such proposals in any forthcoming referendum. Such an approach is undemocratic and were it to be implemented in practice could be unlawful. **The Council therefore requests that all references to wider 'area of interest' be removed from the draft Neighbourhood Plan and Management Plan. It should be clear that the policies and contents of the Plan relate only to the defined Neighbourhood Area.**

The removal of any references to a wider 'area of interest' does not preclude the KNF engaging or commenting on planning applications within Kensington and Chelsea. The Council has taken into account the comments received from the KNF in the last round of the Local Plan consultation. These comments have informed the production of the Publication Version of the Council's Local Plan Partial Review, which is currently out to consultation. The South Kensington and Knightsbridge 'place' chapters (Chapters 13 and 14) are of particular relevance to the Knightsbridge Neighbourhood Area.

Planning Line:

Email:

Web: www.rbkc.gov.uk

The Council notes a number of 'actions' outlined in the Management Plan for the area, which involve working with Kensington and Chelsea. The plan should recognise the limited mandate a local referendum within the defined Knightsbridge Neighbourhood Area has to determine 'actions' within Kensington and Chelsea. We would, however, welcome the opportunity to proactively engage with the Forum to test the feasibility and local support for such initiatives.

Subject to the removal of references to the wider 'area of interest, the Royal Borough of Kensington and Chelsea supports the Knightsbridge Neighbourhood Plan and looks forward to collaborating with the Forum and the City of Westminster to continue to improve Knightsbridge.

Yours sincerely,

Jonathan Wade
Head of Forward Planning

KNIGHTSBRIDGE'S CHARACTER

Objectives	Sub-objectives	Policies
1.0 Enhance the special character of Knightsbridge including its architecture, heritage and townscape while recognising its status internationally as a prime residential neighbourhood and centre for retail, culture and education	<p>1.1 Ensure that all buildings apply the highest quality design and materials</p> <p>1.2 Ensure business developments respond to local character</p> <p>1.3 Restore heritage features</p> <p>1.4 Protect important views and properties</p> <p>1.5 Resist tall buildings inconsistent with local scale</p>	<p>KBR1 (Character, design and materials)</p> <p>KBR2 (Commercial frontages, signage and lighting)</p> <p>KBR3 (Boundary railings and walls)</p> <p>KBR4 (Heritage features)</p> <p>KBR5 (Local views)</p> <p>KBR6 (Local buildings and structures of merit)</p> <p>KBR7 (Tall buildings)</p>
2.0 Improve the public realm and enhance and restoring heritage features	<p>2.1 Promote high quality streets, paths and publicly accessible open spaces that meet the needs of local people while supporting the high volumes of workers, students and visitors</p> <p>2.2 Substantially improve the street appearance</p> <p>2.3 Improve roofscapes</p> <p>2.4 Facilitate urban greening</p> <p>2.5 Protect and enhance local green spaces</p>	<p>KBR8 (Pedestrian movement along, across and adjacent to Brompton Road)</p> <p>KBR9 (Street furniture)</p> <p>KBR10 (Advertising)</p> <p>KBR11 (Roofscapes and balconies)</p> <p>KBR12 (Urban greening)</p> <p>KBR13 (Protection and maintenance of Local Green Spaces)</p>
3.0 Protect and enhance Hyde Park and Kensington Gardens Metropolitan Open Land (MOL) including the Hyde Park Barracks land		<p>KBR14 (Local character of the Neighbourhood Area's MOL)</p> <p>KBR15 (Metropolitan Open Land)</p> <p>KBR16 (Proposed development at the Hyde Park Barracks land)</p>

1 OBJECTIVE 1.0 ENHANCE THE SPECIAL CHARACTER OF KNIGHTSBRIDGE INCLUDING ITS ARCHITECTURE, HERITAGE AND TOWNSCAPE WHILE RECOGNISING ITS STATUS INTERNATIONALLY AS A PRIME RESIDENTIAL NEIGHBOURHOOD AND CENTRE FOR RETAIL, CULTURE AND EDUCATION

Sub-objective 1.1 Ensure that all buildings apply the highest quality design and materials

POLICY KBRI: CHARACTER, DESIGN AND MATERIALS

Proposals for new development or the redevelopment of existing buildings will be supported where they demonstrate how they contribute positively to the features of the respective Character Areas, as shown on the Proposals Map, or the surrounding area if outside a Character Area. In particular they should fundamentally reflect the following criteria:

- a. They must be in keeping with the character of the surrounding area. They should take their design cues from this, including scale, height, massing, built form and alignment whilst demonstrating original, innovative design **and the finest modern architectural**. For each of the respective Character Areas, this should observe the following cues:
 - i. **Area 1 ('Kensington Squares') – terraced buildings in stock brick, stucco half stucco or stone**
 - ii. **Area 2 ('Albertopolis') – buildings in red brick or terracotta, on large plots and of a large scale**
 - iii. **Area 3 ('Knightsbridge Green and Albert Gate') – red-brick, large scale buildings, with Knightsbridge Green having a singular townscape appearance and Albert Gate a mixed townscape appearance**
- b. The highest quality materials should be used that are in keeping with the identity of those used in the respective Character Area or the surrounding area if outside a Character Area. This is particularly the case for external features, notably:
 - i. **rectangular or square sash windows;**
 - ii. **white paint on terraces and pastel paint or plain brick in mews developments**
 - iii. **stucco surfaces (either painted or unpainted in keeping with the character of the street).**
- c. External lighting and CCTV cameras for buildings with a public frontage being in keeping with the respective Character Area or the surrounding area if outside a Character Area.
- d. External electrical wires, aerials and satellite dishes should be hidden from view or, **if this is not possible, have their visual impact minimised**
- e. Plant and equipment such as air conditioning units should be hidden from view or, **if this is not possible, have their visual impact minimised**
- f. They must not reduce the level of existing private amenity space for neighbouring residential properties.

Comment [JA1]: Do you actually mean this? I think perhaps what you may be intending is a ref to the need for the highest quality of design and the "finest modern/up-to-date architectural techniques". Modern architecture I think would be taken to mean ultra-modern glass and steel buildings are sought. This may be right in some areas a wrong in others.

Comment [JA2]: This text risks permitting the destruction of a historic jewel of a building with great intrinsic merit (as it is not in keeping with the architecture stated here) so long as it is replaced by architecture as specified here. Just because a building is not in keeping with everything around it does not make it without merit. Perhaps this policy should not apply to demolition of any existing building unless it can be demonstrated it is without merit?

Comment [JA3]: Please add "Respecting the local context" as in a street of brick 1 pastel (or vice versa) looks horrible! Cf Princes Gate Mews which has 1 house with a horrible yellow brick and the rest painted.

Comment [JA4]: Can there be a reference somewhere to make clear that where planning/conservation requires a higher standard this will over-ride this text? I have had air con and dishes etc refused due to the damage it would cause to views – I would not want this greater protection over-ridden by this text saying "visual impact minimised" means it is now OK

Conformity reference: London Plan Policies 7.4, 7.6; Westminster UDP Saved Policy DES1

- 1.1 One of the notable features that defines Knightsbridge's distinctive character is the high quality of its built environment. Most of the Area is covered by the three Conservation Areas – Knightsbridge, Knightsbridge Green and Albert Gate. These Conservation Areas are very well established, Knightsbridge having been designated in 1968 and Albert Gate and Knightsbridge Green in 1989.
- 1.2 This character is reflected across the range of uses, from the residential squares including terraces, mansion blocks and mews, to the hotels and then to the iconic cultural buildings and landmarks such as the Royal Albert Hall; equally iconic buildings immediately outside the area such as the Albert Memorial enhance this.
- 1.3 The Plan seeks to ensure that all buildings contribute to KNF's vision and values for the Knightsbridge area. Built development must help Knightsbridge to be the best place to live, work, study and visit. Importantly though, it must also help Knightsbridge to embrace its six values of community, conserving, clean, safe and quiet, iconic, international and inspiring.
- 1.4 To achieve this, it is important to ensure that all development applies the highest quality design and materials and to ensure that external features are in keeping with the character of the local area.
- 1.5 It is important that development relates well to the design of existing local buildings, both within the individual character areas of the respective conservation areas, but also in the parts of the Area that are not in any conservation area. Development pressure, coupled with the resilience of the property market in well-established locations such as Knightsbridge, could otherwise result in pressures to compromise on design quality in new proposals. Some modern designed buildings that have been built in or close to Knightsbridge have shown little regard for the character of the area in question. This has been in their design or scale or both. One particular example is the One Hyde Park building. This is not to say that original, innovative design is not encouraged, rather that the finest examples of modern architecture still sit well within their local surroundings.

Sub-objective 1.2 Ensure business developments respond to local character

POLICY KBR2: COMMERCIAL FRONTAGES, SIGNAGE AND LIGHTING

Development proposals for new shopfronts, signage and/or lighting to commercial premises are expected to be of a high quality design and demonstrate that they would enhance the character of the building, the shopping frontage and the conservation area within which it is located. In order to achieve this, the following design features will be supported:

- a. The use of the highest quality signage from sustainable materials, with the use of plastic signage being strongly resisted. The protection of original architectural detail, and where appropriate its reinstatement will be particularly strongly supported.
- b. The retention of existing or provision of new pilasters and corning.

Comment [JA5]: May I suggest you make clear that this relates only to advertising/signs etc directly related to the premises itself alone (and not its products or wider matters) We have had multiple applications in the K&C bit of Knightsbridge for the addition of 'signs' to premises which were actually moving film advertising panels (think Piccadilly Circus) advertising anything and everything. We have had all turned down do far, but this text is wide enough that it could be taken as give support for such signs. You may also want to oppose any sign with moving or scrolling images as they are very intrusive (flash flicker) and distracting.

- c. If lighting of a shopfront is proposed, this should involve ultra low energy lamps not fluorescent or strip lighting.
- d. The clear display of the property address number in keeping with other address numbers along the street.
- e. Security measures other than external shutters.
- f. There should be no signage or other decorative or promotional features placed on the pavement.

Conformity reference: London Plan Policy 7.4; Westminster UDP Saved Policies DES5, DES8

- 1.6 There is a significant range and number of commercial business premises operating in the Knightsbridge Area. These range from shops to offices to bars, cafes, restaurants and clubs. The largest concentration is along Brompton Road but there are significant clusters of business premises along the other main routes such as Knightsbridge. There is some further isolated provision elsewhere across the Area.
- 1.7 With such a large number and type of different businesses operating across the Area, inevitably there is a wide range of design quality of these premises. In particular the quality of design of their frontages and associated signage varies considerably. The vision to make Knightsbridge the best place to live, work, study and visit means that the visual quality of its commercial properties is just as important as its residential development. Signage that is not of the same quality of design and materials as the high quality frontages Knightsbridge gives a poor first impression to visitors. This in turn further attracts businesses that do not add value to Knightsbridge and do not serve local residents with the services that they need or value. It is vital therefore that business developments respond better to the local character.

Sub-objective 1.3 Restore heritage features

POLICY KBR3: BOUNDARY RAILINGS AND WALLS

- A. Proposals for new development or major refurbishment of existing properties (i.e. any scale of development between Level 1 and Level 4 as shown in Appendix D) on sites adjacent to properties with heritage railings or walls will be supported where they provide heritage railings or walls that are in keeping with the adjacent provision, particularly in terms of style, scale and materials. In particular this should involve where relevant
 - a. Painted wooden signs (as opposed to plastic signage)
 - b. Retention of pilasters and cornicing
 - c. Where mounted on the railings, lighting with individual lamps not strip lighting
- B. Any such development will be expected to restore heritage features that are within the boundary of the application site. In particular this relates to heritage railings.

Conformity reference: London Plan Policies 7.4, 7.5, 7.6, 7.8; Westminster UDP Saved Policy DES7

Comment [JA6]: Do you really mean what this could be taken to say ie that any development whatsoever will be supported so long as it restores heritage features? Perhaps amend to say that those elements of new developments that restore heritage features will be supported?

- 1.8 Many of the heritage features that are part of the public realm are on the boundaries of privately owned properties. In order to maintain and enhance the high quality street scene, is important

that development provides new, high quality boundaries where there is currently a gap in the boundary or the existing boundary is out of keeping with the surrounding area. The definition of 'major' refurbishment in Policy KBR3 is intended to exclude this requirement for minor extensions or small-scale cosmetic improvements to properties.

POLICY KBR4: HERITAGE FEATURES

- A. Development proposals that include the replacement of missing street lamps with heritage lamps that are in keeping with the character of the surrounding area will be supported.
- B. Replacement of existing areas of paving with York stone or an equivalent quality alternative around the squares and natural quality finishes elsewhere (including granite setts) will be supported.
- C. Replacement of existing road surfaces with cobbles in the residential 'mews' roads and tarmacadam in the other roads will be supported.

Conformity reference: London Plan Policies 7.4, 7.5, 7.6, 7.8; Westminster UDP Saved Policy DES7

Comment [JA7]: Same point as above. Do you really mean what this could be taken to say ie that any development whatsoever will be supported so long as it restores heritage features? Perhaps amend to say that those elements of new developments that restore heritage features will be supported?

- 1.9 One particular issue is the need to replace or repair paving and roadways that are in a poor state of repair. Over time, York stone paving appears to have been replaced with cheaper alternatives. In addition, heritage railings and street lamps in the Conservation Areas should be replaced where they are missing or in a poor state of repair. These types of issue serve to detract from Knightsbridge as a place and from the quality environment of the respective conservation areas and character areas in particular.

Sub-objective 1.4 Protect important views and properties

POLICY KBR5: LOCAL VIEWS

New development will be expected to demonstrate that it will not have a detrimental impact on the view north along Montpelier Street.

Conformity reference: London Plan Policy 7.7; Westminster UDP Saved Policy DES15

- 1.10 Views across the Knightsbridge Area are already afforded a considerable level of protection through WCC policy. A series of important local views were identified by stakeholders and only one was identified that is not in the Conservation Area Audits (CAAs). This is the view north along Montpelier Street.

POLICY KBR6: LOCAL BUILDINGS AND STRUCTURES OF MERIT

- A. In addition to those already identified in the Conservation Area Audit, the following buildings are considered to be important but unlisted local buildings or structures of merit and their redevelopment should meet the requirements of Westminster UDP Saved Policy DES9(C) (Conservation areas):
- a. Hyde Park Barracks
 - b. 4 Montpelier Street, formerly the Montpelier Mineral Water Works
 - c. 122 Brompton Road, formerly the Soldiers and Sailors Help Society
 - d. The 'Hole-in-the-Wall' in Rutland Mews East/Rutland Street
 - e. 1 Knightsbridge Green
 - f. All heritage telephone boxes and post boxes

Conformity reference: London Plan Policy 7.8; Westminster City Plan Policies S11, S25; Westminster UDP Saved Policy DES9

- 1.11 A great many of the buildings in the Area are nationally listed and protected by conservation area status. In addition, several buildings that are not nationally listed have been identified as important 'unlisted buildings of merit' in the CAA.
- 1.12 There are some unlisted buildings and structures which the community consider to be of merit because they contribute towards the character and quality of the local area. These are addressed in Policy KBR6.

Sub-objective 1.5 Resist tall buildings inconsistent with local scale

POLICY KBR7: TALL BUILDINGS

- A. Knightsbridge is not appropriate for tall buildings, generally defined as those that are significantly taller than their surroundings.
- B. In recognition of the sensitivity of the historic and lower-scale residential environment of Knightsbridge, tall buildings, including redevelopment of or extensions to such buildings, will be refused planning permission within conservation areas.
- C. Elsewhere in the Knightsbridge Neighbourhood Area, tall buildings including redevelopment of or extensions to such buildings, will only be permitted if they do not have a harmful impact on:
- a. listed buildings and other heritage assets or local buildings of merit;
 - b. significant or important views, both strategic and local, including townscape views and historic skyline features;
 - c. the setting or openness of open spaces including local green spaces and Metropolitan Open Land, as required by London Plan Policy 7.17;
 - d. adjacent buildings by overshadowing;
 - e. the microclimate of the surrounding area; and
 - f. the character and amenity of surrounding buildings.
- D. If tall buildings are permitted they must:
- a. take full account of the character of their surroundings;

- b. provide a high quality public realm at ground level that increases permeability for pedestrians;
- c. enhance the character and amenity of their surroundings, including the relationship with existing tall buildings excluding the Peninsular Tower; and
- d. take full account of the significance of heritage assets and their settings.

E. If tall buildings are permitted outside the KNA, that could have an impact on the KNA, they should comply with the requirements of this policy.

Conformity reference: London Plan Policy 7.7; Westminster UDP Saved Policy DES3; Westminster City Plan Policy S26

- 1.13 The development of tall buildings is a London-wide issue but could have very different impacts depending on the location.
- 1.14 This is supported by the London Plan which notes at paragraph 7.25 that tall buildings can have a significant detrimental impact on local character. Nowhere in the Knightsbridge Area is identified by the Westminster City Plan as being suitable for tall buildings.
- 1.15 The main reason for this is that in Knightsbridge, the general height of buildings is comparatively low. Therefore the development of new tall buildings brings with it the significant prospect of there being a detrimental impact. In an area where one of the defining characteristics is the reasonably low density and traditional design of buildings, such tall buildings become very prominent in the streetscape because they are not in keeping with the character of the area. One such example frequently cited is the One Hyde Park building.
- 1.16 Whilst Knightsbridge has a number of buildings that are larger than its surrounding area (including the Peninsular Tower which is referred to in the policy and dealt with in more detail under Objective 3), the predominant height of the skyline has been well established, particularly where this relates to the relationship of the area to Hyde Park. This is also punctuated by the large amounts of open space – the garden squares - which separate many of the residential areas. These squares have been able to flourish because development has not been allowed to become overbearing.

2 OBJECTIVE 2.0 IMPROVE THE PUBLIC REALM AND ENHANCE AND RESTORE HERITAGE FEATURES

Sub-objective 2.1 Promote high quality streets, paths and publicly accessible open spaces that meet the needs of local people while supporting the high volumes of workers, students and visitors

POLICY KBR8: PEDESTRIAN MOVEMENT ALONG, ACROSS AND ADJACENT TO BROMPTON ROAD

- A. Development proposals that would result in improved pedestrian movement along, across and adjacent to Brompton Road will be supported, particularly if this addresses pressures at existing pedestrian crossings or specific hotspots of pedestrian congestion at bus stops or the junctions with the following Local Roads:
 - a. Lancelot Place
 - b. Montpelier Street
- B. Proposals to improve pedestrian movement along Local Roads or areas that join Brompton Road will also be supported.
- C. In order to improve pedestrian safety, proposals to provide pedestrian priority when crossing any of the Local Roads that form a junction with Brompton Road or between Local Roads will be strongly supported.
- D. Any proposals that could reduce the space available to pedestrians along the footway within the Neighbourhood Stress Area through the siting of tables and chairs or otherwise must fully and comprehensively address all of the requirements of Westminster UDP Saved Policy TACE11 and minimise hazard for customers and pedestrians.
- E. If development proposals create additional footway space along Brompton Road then no proposals to site additional tables and chairs along this stretch of footway will be permissible.

Conformity reference: London Plan Policy 6.10; Westminster UDP Saved Policy TRANS3, TACE11

Comment [JA8]: Same point as above. Do you really mean what this could be taken to say ie that any development whatsoever will be supported so long as it improved pedestrian movement? Perhaps amend to say that those elements of new developments that improve pedestrian movement will be supported?

Comment [JA9]: Same point as above

- 2.1 One of the fundamental parts of the public realm are the streets.
- 2.2 Of particular concern are the main thoroughfares of Brompton Road and Knightsbridge. With Brompton Road serving Knightsbridge's role as an International Shopping Centre, there has been a significant observed increase in pedestrian activity in the area. This, coupled with the growing trend of tables and chairs on the pavements (serving the increasing number of coffee shops, cafes and restaurants), has served to create pinchpoints where pedestrian movement is impeded and hazard created.
- 2.3 Knightsbridge is well above the London and Westminster averages (for equivalent sized areas) for slight and serious injury collisions involving motorised vehicles. Most of these are in the east

of the Area where Brompton Road and Knightsbridge come together at Scotch House Corner, which is where pedestrian movement is particularly high. Moreover, these injuries are also noticeably regular near pedestrian crossings and at road junctions where there is no dedicated crossing facility; Lancelot Place (opposite Harrods) is one such example. The main casualties are pedestrians, cyclists and motorists including motorcyclists.

- 2.4 Often the build-up of traffic also makes crossing the road hazardous and, for disabled users, very difficult.

Sub-objective 2.2 Substantially improve the street appearance

POLICY KBR9: STREET FURNITURE

- A. Development proposals that provide improvements to the public realm will be strongly supported. In particular, such proposals will be considered favourably if they result in the following:
- a. Replacement of missing street lamps,
 - b. Replacement of existing areas of paving and roadways that are in a poor state of repair, preferably with York stone, natural quality paved surfaces and granite kerbs,
 - c. Removal of non-heritage telephone boxes,
 - d. Removal of utility cabinets.

Conformity reference: London Plan Policies 7.4 and 7.5; Westminster UDP Saved Policy DES7

Comment [JA10]: Same point as above 'those elements of developments that will.... will be supported'

- 2.5 Feedback from the community has highlighted a growing concern about the declining quality of the public realm and the need to improve the street appearance.

- 2.6 Over time, the increasing numbers of users has led to the need for more investment in ongoing maintenance to various aspects of the street scene. This includes street furniture, paving, railings and lighting. This has been added to by the increasing clutter of street furniture – signage, lighting, electrical cabinets, etc.

POLICY KBR10: ADVERTISING

- A. Proposals to display advertising should ensure that they do not have a detrimental impact on the amenity of the area. This particularly applies to Conservation Areas and areas where the advertising would obscure buildings of heritage value or visually detract from them.
- B. Policies by Westminster City Council to restrict deemed consent for advertising in telephone boxes will be strongly supported.

Conformity reference: NPPF, paragraph 67

Comment [JA11]: Can there be a reference to make clear that where planning/conservation requires a higher standard this will over-ride this text? I have had advertising refused/shrunk to much smaller etc due to the damage it would cause to views/areas – I would not want this greater protection over-ridden by this text potentially being weaker. K&C has strict rules on the size of adverts and when planning permission is required (and has just won an appeal against a large advert)
May I suggest you make clear how this text differs to the text on signs on shops? Do you want to (can you?) oppose moving/scrolling adverts? Can you oppose/say you do not favour new free-standing advertising panels on the street? Eg. the bus shelters that have been removed and replaced (without permission) with advertising panels alone.

- 2.7 Some iconic buildings within the KNA have been obscured, at least on a temporary basis, by very large advertising signs. Some of these signs are as large as 8,000ft² and spoil the enjoyment of the very features that have afforded them heritage status in the first place. Whilst the placement of proportionate advertising within the Conservation Areas and outside heritage buildings is considered acceptable in principle, the use of large-scale banner advertising which obscures those buildings and has a detrimental impact on the Conservation Area, is not considered acceptable and is resisted. The same principle applies to advertising in telephone boxes which, whilst afforded ‘deemed consent’ under planning law, can have this consent removed by the local planning authority if considered appropriate. Any such action by Westminster City Council will be strongly supported.
- 2.8 The design and consideration of advertising should follow the guidance in the Westminster Advertising Design Guidelines Supplementary Planning Guidance document.

Comment [JA12]: Can there be a reference to make clear that where planning/conservation requires a higher standard and/or planning permission and/or requires compliance with a policy this will over-ride this text? (the ref to 2.8 is only to guidance) I have had advertising refused/shrunk to much smaller etc due to the damage it would cause to views/areas – I would not want this greater protection over-ridden by this text potentially being weaker. K&C has strict rules on the size of adverts and when planning permission is required (and has just won an appeal against a large advert)

Sub-objective 2.3 Improve roofscapes

POLICY KBR11: ROOFSCAPES AND BALCONIES

- A. Development that proposes additional roof storeys which take it above the prevailing roofline should **have to** demonstrate that this would not be out of keeping with the character of the surrounding area.
- B. New development, including plant, machinery or associated equipment, ducts, tanks or satellite or radio aerials on the roof of buildings will be expected to meet all of the following criteria:
 - a. It includes appropriate visual and acoustic screening
 - b. A management strategy is agreed for maintaining the plant, machinery and telecommunications equipment and for the removal of redundant equipment.
- C. No plant, machinery, canopies, fences, loggias, trellises or satellite or radio antennae shall be permitted on a balcony if it is visually obtrusive, either from ground or upper levels.
- D. New development that includes balconies is supported, provided it meets all of the following criteria:
 - a. it does not have a detrimental impact on the roofscape of the immediate surrounding area; and
 - b. it does not have an impact on the amenity of residents by virtue of overlooking, **light pollution** and noise.
 Adjacent to green space or Metropolitan Area Land, balconies are discouraged.

Comment [JA13]: This text appears to conflict with the text at para 2.9 as one is an absolute and the other is open to discussion. I prefer the bit saying proposal out of keeping with the prevailing roofline will be resisted.

Comment [JA14]: Again, can this make clear this policy does not over-ride higher protections, where they exist, against these developments

Deleted:

Conformity reference: Westminster UDP Saved Policy DES6

- 2.9 The character of Knightsbridge is arguably as important at roof level as it is at ground level. The skyline of Knightsbridge contains some iconic buildings and many other buildings with rooflines

of architectural significance. It is therefore important that development of additional roof storeys is not out of keeping with the prevailing roofline. Any such proposals will be resisted.

Sub-objective 2.4 Facilitate urban greening

POLICY KBR12: URBAN GREENING

- A. In order to enhance the environment and biodiversity, it is expected that every opportunity is used to incorporate planting as part of new development.
- B. Proposals for new development will be expected, where physically feasible, to include a high quality of landscaping, tree and shrub planting. This should preserve and enhance the landscape character of the site and the local area, the ecological value of the site and any wildlife corridors.
- C. In order to increase the environmental sustainability of built development, proposals for the development of new buildings or replacement of existing buildings are required to include the provision of green roofs and green walls (where a blank wall is proposed as part of the development) where physically feasible. In order to ensure that these green assets can thrive over the long term, the application must:
 - a. provide the maximum practicable coverage; and
 - b. include a clear planting plan demonstrating resilience to disease, pests and climate change that is consistent with the principles of Policy KBR45 (Trees); and
 - c. include a clear management plan (where this does not create viability issues for the overall development) that is consistent with the principles of Policy KBR45 (Trees) and incorporates a contingency strategy for failure to ensure the fabric of the building is not damaged; and
 - d. ensure that the building design enables the retention of the quality of the underlying green wall and/or green roof in the event that the planting fails or is not properly maintained.

Conformity reference: London Plan Policies 5.10, 5.11; Westminster UDP Saved Policy ENV4

- 2.10 The green spaces and biodiversity assets in Knightsbridge are very important in making it such a high quality place to be. This was a view reinforced by the local community in preparing the Plan. For Knightsbridge to be the best, it wishes to take forward an 'urban forest' approach.
- 2.11 In order to take forward the principles of the urban forest and maximise biodiversity, it is necessary to make the most of every single opportunity and to be as creative as possible.
- 2.12 Opportunities created by flat surfaces (including walls) and roofs are sufficiently important in helping mitigate against the impacts of climate change and reducing the urban heat island effect, that such provision should be expected by developments.

Sub-objective 2.5 Protect and enhance local green spaces

POLICY KBR13: PROTECTION AND MAINTENANCE OF LOCAL GREEN SPACES

- A. The areas shown on the Proposals Map are designated as a Local Green Spaces
- B. Proposals for built development on or underneath these Local Green Spaces will not be permitted unless the proposal is of a limited nature and it can be clearly demonstrated that it is required to enhance the role and function of that Local Green Space.

Conformity reference: London Plan Policy 7.18

- 2.13 Under the NPPF, Neighbourhood Plans have the opportunity to designate Local Green Spaces which are of particular importance to them. This will afford protection from development other than in very special circumstances. Paragraph 77 of the NPPF says that Local Green Spaces should only be designated:
- *"where the green space is in reasonably close proximity to the community it serves;*
 - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - *where the green area concerned is local in character and is not an extensive tract of land."*
- 2.14 The seven garden squares, Queen's Lawn, Knightsbridge Green and the area in front of 26-31 Prince's Gate in the Area are designated as Local Green Spaces.

3 OBJECTIVE 3.0 PROTECT AND ENHANCE HYDE PARK AND KENSINGTON GARDENS METROPOLITAN OPEN LAND (MOL) INCLUDING THE HYDE PARK BARRACKS LAND

3.1 The Hyde Park MOL lies to the east of West Carriage Drive and the Kensington Gardens MOL to the west of West Carriage Drive.

Heritage of the Neighbourhood Area's MOL

3.2 The Neighbourhood Area's MOL has a significant heritage, with an understanding of its use stretching back as early as the eleventh century.

A significant feature of the Neighbourhood Area's MOL since 1793 has been the Hyde Park Barracks, which was created from parkland.

Local character of the Neighbourhood Area's MOL

POLICY KBRI4: LOCAL CHARACTER OF THE NEIGHBOURHOOD AREA'S MOL

- A. Development in the Neighbourhood Area's MOL must not harm the character of the Neighbourhood Area and its surroundings.
- B. Development must not adversely affect the tranquillity of the Neighbourhood Area's MOL and its surroundings.
- C. Development in the Neighbourhood Area's MOL should deliver all the following objectives. In demonstrating how their proposals deliver these objectives, applicants must provide accurate visual representations of the proposals against agreed views. Applicants must also provide commentary outlining what steps have been taken to achieve all these objectives:
 - a. Maintain, strengthen, and expand the parkland character and recreational function of the whole area and plan for the next generation of trees.
 - b. Maintain and strengthen the historic functions of the Neighbourhood Area's MOL as an integral part of the Royal Parks; this may be achieved through promoting land uses complementary to the Royal Parks and reducing the dominance of the South Carriage Drive as a vehicular route.
 - c. Where applicable, soften the currently hard edge created by the Hyde Park Barracks so that the site fulfils its role as MOL land and part of Hyde Park.
 - d. Increase permeability and connectivity for pedestrians and cyclists north-south across the Neighbourhood Plan Area, connecting to Hyde Park to the north and the streets of Knightsbridge to the south.
 - e. Maintain the treed skyline in views from Hyde Park and Kensington Gardens, with particular regard to protected views and views from around the Serpentine and Long Water.
 - f. Take measures to reduce the prominence of discordant visual features such as the Peninsular Tower.
 - g. Maintain the consistency in scale and materials of the urban edge that forms a setting to the study area and the Royal Parks, and ensure that any new development fits with, or enhances, this characteristic.

h. Maintain and enhance the historic parkland features of the study area that form a setting to the adjacent Conservation Areas and Royal Parks.

Conformity reference: London Plan Policies 6.10, 7.4, 7.5; Westminster City Plan Policies S11, S35; Westminster UDP Saved Policy DES1

- 3.3 The Neighbourhood Area's MOL is subject to a variety of special designations, reflecting its special qualities.
- 3.4 It is incumbent on the applicant to clearly show that its proposed use will cause no net adverse effects on the tranquillity of the area. This must include assessments of noise and vehicular trip generation. Electric vehicle infrastructure must be provided, in accordance with Policy KBR38.
- 3.5 Any methodology in respect of assessing noise and trip generation must be quantitative wherever possible and must be agreed with Westminster City Council as the local planning authority. For so long as the KNF remains the designated neighbourhood forum for the Knightsbridge Neighbourhood Area, the local planning authority is expected to agree this methodology with the KNF, prior to the submission of a planning application. If the KNF does not support this methodology then an assessment should not be accepted by the local planning authority or used in the determination of a planning application and planning permission refused.
- 3.6 Development proposals must also be determined in part through an assessment of the visual impact of development on key local views. Applicants must include as part of this analysis accurate visual representations depicting their proposals on all of the views provided in the LUC report. Applicants must also similarly assess other key townscape and landscape views as may be appropriate in that instance. Any further views which an applicant provides must be agreed with the local planning authority. For so long as the KNF remains the designated neighbourhood forum for the Knightsbridge Neighbourhood Area, the local planning authority is expected to agree any further views with the KNF, prior to the submission of a planning application. If the KNF does not support the use of these views then an assessment should not be accepted by the local planning authority or used in the determination of a planning application.
- 3.7 The green infrastructure provided by the parkland of Hyde Park contributes towards the local character of the Neighbourhood Area's MOL. This is described in detail in Section 4 of the LUC report. Any proposals within the Neighbourhood Area's MOL must be assessed against Policy KBR44 (Natural environment).

Metropolitan Open Land

POLICY KBR15: METROPOLITAN OPEN LAND

- A. The strongest protection will be given to the Neighbourhood Area's MOL. Development is subject to this policy if it comprises:**
- a. above-ground works that would materially affect the external appearance of building(s) and/or land;
 - b. additional subterranean development, as it may affect openness; or
 - c. a material change of use.
- B. A material change of use will be considered 'not inappropriate' if it maintains**

openness and does not conflict with the purposes of including land in the MOL.

- C. Physical work will be considered ‘not inappropriate’ under this policy where they satisfy the following criteria:
- a. They comprise the re-use of buildings of permanent and substantial construction. This is subject to such development preserving the openness of the MOL and not conflicting with the purpose of the MOL designation.
 - b. They comprise the replacement of building(s), provided the new building(s) is/are in the same use and not larger than the one it replaces. ‘Larger’ is defined under this policy as involving any increase in mass (height, width or length) that would be larger than the existing when seen from surrounding public and private views.
 - c. They comprise the extension or alteration of a building, provided that they do not result in additions over and above the size of the original building. ‘Additions’ is similarly defined under this part of the policy as involving any increase in mass (height, width or length) that would be larger than the existing when seen from surrounding public and private views.
 - d. They comprise limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), so long as it would not impact on the openness of the MOL and does not conflict with the purpose of the Neighbourhood Area’s MOL designation.
- D. Ancillary facilities for ‘not inappropriate’ uses will only be acceptable where these are i) essential and ii) maintain the openness of the MOL.

Conformity reference: London Plan Policy 7.17; Westminster City Plan Policy S11; Westminster UDP Saved Policy ENV14

- 3.8 The acceptability of any development proposals must also be considered in terms of effects on Metropolitan Open Land (MOL).
- 3.9 In its entirety, the MOL contains features or landscapes (historic, recreational, biodiversity) of metropolitan value. Hyde Park Barracks is considered a feature of historic metropolitan value. The construction of the current Barracks complex in 1967-70 pre-dates the designation of the land as MOL.

Hyde Park Barracks land

Heritage and Use of National Importance

- 3.10 Since the introduction of this use in the eighteenth century, the Hyde Park Barracks land has exclusively been used as military barracks.

Site allocation

- 3.11 The Proposals Map of the City Plan identifies part but not all of the Hyde Park Barracks as a Proposal Site (Site 34 – ‘Strategic Housing Site ‘with the capacity for over 100 units’), with Appendix 1 of the City Plan noting a ‘change of use from barracks to residential, including full on-site provision of affordable housing and the full range of housing sizes.’

- 3.12 The land occupied by the Barracks has special status under law and the KNF understands that it cannot be sold without primary legislation. The implication of this is that realistically the Hyde Park Barracks land is not presently available for the development identified in the Westminster City Plan.
- 3.13 An alternative option would be to retain a barracks use on the same land and provide new housing alongside it. However, there is no guarantee that it would be feasible for a development to deliver over 100 homes (the minimum requirement of a strategic site by the City Plan) in that configuration, given the limited extent of Site 34 (which does not include the Peninsular Tower). This would need to be clearly addressed by any planning application.

POLICY KBR16: PROPOSED DEVELOPMENT AT THE HYDE PARK BARRACKS LAND

- A. Development at Hyde Park Barracks must not adversely affect the tranquillity of the Neighbourhood Area's MOL and its surroundings.
- B. Development proposals at Hyde Park Barracks involving a material change of use must be assessed against the following hierarchy (from 1 to 3):
 - 1. The removal of existing Barracks building(s) and the reversion of the relevant land to parkland is strongly supported.
 - 2. Except where the site is reverted to parkland, the retention of the barracks use is sought.
 - 3. Any proposed alternative use must be assessed against all relevant development plan policies.
- C. Development involving non-residential uses, including as part of a mixed use development, is less likely to satisfy the full range of development plan policies and more likely to adversely affect the tranquillity of this part of the Neighbourhood Area's MOL and its surroundings.
- D. Development proposals (including any demolition) that would materially affect the external appearance of building(s) and/or land or that would involve subterranean development must be justified against each of the following criteria:
 - a. The demolition of the Peninsular Tower is sought as part of any development proposals.
 - b. Development must provide a series of permanent public access routes through the Hyde Park Barracks land, creating permeability within the site in a north-south direction.
 - c. The effect of the proposed development on local views, including the setting of heritage assets, will be afforded considerable weight and adverse effects on any identified view strongly resisted.
- E. Development proposals must only be assessed against a benchmark of a scheme that does not include either the Peninsular Tower or the existing boundary walls. The Peninsular Tower will not be accepted as a benchmark. The removal of the Peninsular Tower may not be used to justify any additional massing or intensification of activity elsewhere across the site.
- F. Development which (by reference to the views contained in the LUC report¹) would:
 - d. occupy the same or a smaller mass (height, width, length) than the existing is more likely to be acceptable;
 - e. occupy a greater mass than the existing in terms of height, width or length is unlikely to be acceptable and will require detailed justification to:
 - i. demonstrate no adverse effect to any of the views set out in the LUC report;
 - ii. demonstrate that the openness of the MOL is preserved; and
 - iii. demonstrate that it will not be visible above the tree line from identified views in Hyde Park.

¹ Land Use Consultants (2016) *Report on the Metropolitan Open Land (MOL) within the Knightsbridge Neighbourhood Area: Local Character and Views*

G. Development that would be visible above the tree line from identified views from Hyde Park will be considered unacceptable in principle.

H. Development must incorporate exemplary standards of sustainable and inclusive urban design and architecture. Significant weight will be afforded to whether the design of new development sustains and enhances the significance of heritage assets. Development which does not achieve these objectives will be refused planning permission.

I. The impacts of construction must be minimised. Construction activity of any kind is unacceptable on Saturdays, Sundays or Bank Holidays and must otherwise meet the requirements of the City of Westminster Code of Construction Practice and the Knightsbridge Code of Construction Practice.

Conformity reference: London Plan Policies 7.4, 7.17; Westminster City Plan Policies S11, S27; Westminster UDP Saved Policy ENV14

Effects on tranquillity

- 3.14 The military and ceremonial use of the Barracks has a limited impact on the Neighbourhood Area and specifically on the tranquillity and amenity of the Neighbourhood Area's MOL. Roughly half of the Barracks floor area accommodates horses and the remainder soldiers. The soldiers essentially occupy the Barracks as one household. Moreover the Barracks are also the soldiers' workplace and movements to and from the site are consequentially minimal in comparison to other uses. The limited scale of activity at the site and the limited numbers of movements in and out (e.g. vehicular movements) reflect the low-intensity nature of the current use.
- 3.15 Any change of use or physical works at Hyde Park Barracks must not adversely affect the tranquillity of this part of the Neighbourhood Area's MOL and its surroundings.
- 3.16 Policy KBR14 (Local character of the Neighbourhood Area's MOL) and its supporting text outline how impacts in terms of tranquillity are to be assessed.

Use

- 3.17 The implication of legislation dating from 1879 is that the Hyde Park Barracks land is not realistically presently available for development for 'strategic housing'.
- 3.18 The fundamental association of the barracks use and the Hyde Park Barracks land is set out above. Except where the site reverts to parkland, the retention of the barracks use is sought.
- 3.19 The site's reversion to parkland would satisfy and address heritage and MOL policy considerations. The Hyde Park Barracks land was historically part of Hyde Park and its intrinsic relationship is recognised by its inclusion within the Royal Parks Conservation Area. Its status as Metropolitan Open Land reflects its status as a feature and landscape of historic metropolitan value. Subject to compliance with other policies in the development plan the land's reversion to parkland, functionally connected to Royal Park, would therefore enhance the significance of the relevant heritage assets and in terms of MOL policy would comprise very special circumstances. The reversion of the site to parkland is accordingly supported in principle.
- 3.20 It is likely that development for any of the following uses would lead to a more intense use of the site and harm its tranquillity. The supporting text to Policy KBR14 (Local character of the

Neighbourhood Area's MOL) above has outlined how this is to be assessed. All the following uses? would be resisted, including as part of a mixed use development. This list is not exhaustive:

Comment [JA15]: Text is unclear, suggest something is missing?

- Retail or any other 'Class A' uses of any kind
- Offices or any other 'Class B' uses of any kind
- Hotels, hospitals or any other 'Class C1' or 'Class C2' uses of any kind
- Sports facilities or 'Class D' uses of any kind
- Nightclubs and most other 'sui generis' uses

3.21 In line with the above, the tranquillity of the Hyde Park Barracks land could likewise be harmfully affected by the different intensity of activity of a residential use. In contrast to the barracks use, which essentially operates as one household, a residential use would see each household operating independently of one another (e.g. making independent trips to and from the site, receiving deliveries independently). Employed residents for example are likely to work off-site and residents will otherwise frequently come to and from the site (e.g. to visit shops, go to school). This could all amount to more activity than the centrally managed barracks use which could accordingly have harmful effects on the tranquillity of the local area.

3.22 The scale of any proposed residential use will accordingly have a significant effect on the tranquillity of the area. It is possible that even densities far lower (in terms of both new homes and new habitable rooms) than indicated by Table 3.2 of the London Plan will cause net adverse effects to tranquillity. The London Plan is explicit that Table 3.2 is not to be applied mechanically but by reference to site-specific constraints and opportunities.

3.23 The sizes of homes and the mix of different types of homes will similarly have different effects on tranquillity and these effects must be specifically considered as part of a planning application, alongside any justification made in terms of housing need.

3.24 There is need in Knightsbridge and Westminster for housing for the elderly. As indicated by the above, the ages of residents are likely to have an effect on the intensity of activity at the site. Housing dedicated for use by older people is likely to have lesser impacts in terms of tranquillity.

Physical works

3.25 Delivering public access through the Hyde Park Barracks land is a key objective for the Neighbourhood Plan, should the land be redeveloped. This site is currently impermeable, providing no form of access for the general public to and from Hyde Park. This is an issue because the Park is an important destination for many different types of user. The objective should be to support permeability in a north-south direction with routes aligned with, at least, Rutland Gate, Trevor Place and Trevor Street. As well as supporting permeability and access for pedestrians and cyclists, this will also enhance views. Permeability will also be improved through a new access at the far eastern extent of the Neighbourhood Area's MOL. Any comprehensive development at the site must achieve these permeability objectives otherwise it will be refused planning permission.

3.26 The effect of a proposed development on local views is to be afforded considerable weight. Such effects are to be assessed as per Policy KBR5 (Local views). Any proposals deemed to adversely affect any specified views should be refused planning permission. Built form which is smaller than the existing silhouette is more likely to be supported.

- 3.27 Development should accordingly respect the existing built footprint and provide space for greenery around the full perimeter of the Hyde Park Barracks land. Sufficient green space should be provided between new buildings and Hyde Park for significant tree planting to survive and thrive. Significant tree planting should be provided at this part of the site in particular. Green space should also be provided to the other frontages.
- 3.28 Development which exceeds the existing built footprint, such as took place at One Hyde Park at 100 Knightsbridge, will not be acceptable. For clarity, built footprint in this instance does not include the boundary walls.
- 3.29 Any development must incorporate exemplary standards of sustainable and inclusive urban design and architecture. Significant weight must be afforded to consideration of whether the design of new development sustains and enhances the significance of heritage assets. Development must support the policies for healthy environment and health people set out from Policy KBR41 to KBR48.
- 3.30 Any development at the Hyde Park Barracks land must preserve or enhance the character and appearance of the Royal Parks Conservation Area. It must also not harm the setting of the Registered Park and Gardens or listed buildings. Development must reflect the prevailing character of the area which is characterised by lower density development to the west. After applying this approach, deferential and respectful development closer in style (but not size) to the Bulgari Hotel on Knightsbridge is more likely to be supported than less deferential and less respectful approaches such as that employed at One Hyde Park.
- 3.31 To satisfy Policy KBR16 development is expected to ensure the following:
- Triple yellow lines should be provided (alongside other measures) to preclude on-street vehicular activity associated with any development.
 - All access must be via Knightsbridge and South Carriage Drive only.
 - All access, egress, drop-offs and collections (including by taxi or minicab), servicing and deliveries (including refuse deliveries) must only take place internally inside of buildings located within the site boundaries. It must not take place on the street.
 - Any car parking must be on-site and must only take place within buildings within the site. Any on-site car parking must be restricted to use by electric cars only. Parking proposed for residential use must be limited to one car per home or less. No parking should be proposed for any other proposed uses.
 - No external balconies or terraces should be provided. Planning conditions must be applied precluding the use of spaces for such purposes.
 - All windows must be at least double glazed and must be fitted with window meshes that both restrict opening of the windows and comply with the fire regulations in force at the time of fitting. Westminster City Council previously imposed these specific restrictions under planning permission 04/05371/FULL, granted at the Linstead Halls of Residence.
- 3.32 Roof-level development such as services, plant, machinery or flues must be depicted in any planning application and must be included in accurate visual representations of the proposals against which an application will be assessed.

Comment [JA16]: You may be interested to know that this was required to respond to several incidents of students deliberately throwing items out of their windows (for kicks) which landed on pedestrians and houses below causing considerable damage!

KNIGHTSBRIDGE'S COMMUNITY

Objectives	Sub-objectives	Policies
4.0 Promote the sense of community	<p>4.1 Enhance the vitality of local businesses which serve the local community while keeping the impacts of the day, evening and night-time economy away from residential areas</p> <p>4.2 Ensure new food, drink and entertainment uses are only permitted in areas where they already exist and when residential amenity can be demonstrably protected</p> <p>4.3 Protect and enhance local amenity and retail services and commercial activities</p> <p>4.4 Hold property owners accountable for actions emanating from their properties</p> <p>4.5 Ensure construction impacts are managed and reduced</p>	<p>KBR17 (Neighbourhood Stress Area)</p> <p>KBR18 (Night-time and early morning uses in or adjacent to residential areas)</p> <p>KBR19 (Security and resilience measures)</p> <p>KBR20 (Retail uses in the Primary Shopping Frontages)</p> <p>KBR21 (Local retailing and services)</p> <p>KBR22 (Small shops and professional services)</p> <p>KBR23 (Protection of public houses)</p> <p>KBR24 (Shared community uses)</p> <p>KBR25 (Office uses)</p> <p>KBR26 (Household and commercial waste consolidation)</p> <p>KBR27 (Knightsbridge code of construction practice)</p>
5.0 Protect and enhance existing residential amenity and mix	<p>5.1 Encourage a high proportion of occupied primary residences</p> <p>5.2 Encourage new residential developments to provide a range of housing in value and size</p> <p>5.3 Encourage the restoration of period and other residential buildings to their original size and configuration where this will increase the number of units and discourage the loss of residential units</p>	<p>KBR28 (Short term lets)</p> <p>KBR29 (Residential mix, including housing to support local workers and students)</p> <p>KBR30 (Reconfiguration of existing residential buildings)</p>

4 OBJECTIVE 4.0 PROMOTE THE SENSE OF COMMUNITY

- 4.1 The sense of community in a place comes from a large number of different factors. Moreover, the significance of these factors and how they inter-relate with one another varies from place to place. Knightsbridge brings together residential, commercial and institutional interests and it is where these come into contact with one another that issues can arise. This is being brought into sharp focus by the continuing evolution of London as a '24-hour city', including the changes in 2016 to travel with the night-time running of the London Underground service.
- 4.2 The Mayor of London recognises this delicate inter-relationship and the fact that a significant part of the Central Activities Zone (CAZ) is within the Knightsbridge Area (and the whole KNA is within it).

Sub-objective 4.1 Enhance the vitality of local businesses which serve the local community while keeping the impacts of the day, evening and night-time economy away from residential areas

POLICY KBR17: NEIGHBOURHOOD STRESS AREA

- A. Within the Neighbourhood Stress Area shown on the Proposals Map:
- New entertainment uses will only be permitted where they are small-scale, low-impact and will not result in an increased concentration of evening or late-night uses within the area or an increase in harm to residential amenity.
 - New entertainment uses will also need to demonstrate that they are appropriate in terms of their relationship to the existing concentration of entertainment uses in the Neighbourhood Stress Area and that they do not adversely impact on local environmental quality and the character and function of the area.
 - Any new or increased outdoor use related to an existing or a proposed entertainment use will only be allowed where it will not result in an increase in harm to residential amenity.
- B. In order to minimise the potential for anti-social behaviour, development proposals that are likely to result in the clustering of users outside the premises must demonstrate how they will ensure that such users are managed and dispersed efficiently and effectively. This must take into account the individual needs of the premises in question and the cumulative impacts of the dispersal plans of all premises in the immediate surrounding area (including premises outside the KNA boundary).

Conformity reference: London Plan Policies 2.10, 2.11, 2.12, 4.7; Westminster City Plan Policy S24; Westminster UDP Saved Policies TACE8, TACE9, TACE10

- 4.3 Several parts of the residential neighbourhood of Knightsbridge are located very close to a significant cluster of commercial businesses that form a major part of the Area's entertainment offer in the form of bars, cafes, restaurants and clubs. These residential areas are particularly located at the eastern end of the Area and include Raphael Street and Lancelot Place. It also

impacts on residents of the apartments along Knightsbridge and the southern end of roads forming a junction with Brompton Road such as Montpelier Street. Cheval Place is also a problem area.

- 4.4 These residents have reported that they regularly experience late-night noise due the late opening times of premises with late licences as well as general anti-social behaviour. This also creates a fear of crime, particularly for older residents.
- 4.5 It is recognised that, for a ‘destination neighbourhood’ such as Knightsbridge, which attracts so many visitors, these businesses are part of the attraction of the offer. Also, many of these businesses such as restaurants and bars are an important part of the rich residential life of Knightsbridge. For their part, these businesses require these opportunities in order to maintain their vitality. However, it is important that an appropriate balance is struck. Knightsbridge is very much a ‘commercial and residential’ area, not a ‘late night entertainment’ destination. By designating a ‘Neighbourhood Stress Area’, the Plan seeks to enhance the vitality of local businesses which serve the local community while keeping the impacts of the day, evening and night-time economy away from residential areas.

POLICY KBRI8: 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 additional adverse effects on:
- the amenity of residents and other **noise sensitive uses**;
 - 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.
- The cumulative impacts will also apply to properties located outside the KNA boundary.
- B. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.
- C. Due to the impact on residential amenity, proposals for new (including a change of use to) cafes and restaurants (Class A3), pubs, bars and other drinking establishments (Class A4) and hot-food takeaways (Class A5) in Local Roads are not permitted.
- D. On Local Roads renewal or change of use applications **for non-residential activity** will only be granted if there is a condition attached to the permission prohibiting their operation between 11pm and 7am on Monday to Saturday inclusive and before 7.30am and after 10.30pm on Sunday.

Comment [JA17]: Please define night time

Comment [JA18]: Text a bit odd, was this meant to say something else?

Comment [JA19]: From residential to non-residential activity?

Conformity reference: London Plan Policies 2.10, 2.11, 2.12, 4.7; Westminster City Plan Policy S24

- 4.6 The impacts of entertainment uses across the Neighbourhood Plan Area are particularly acutely felt by local residents at night and in the early morning. It is considered that further increase in evening or night-time uses would disturb the appropriate balance of development in the area.

This is particularly the case for premises located away from the main commercial thoroughfares which are in predominantly residential areas. The main commercial thoroughfares are Brompton Road and Knightsbridge between Scotch House Corner and the Bulgari Hotel.

- 4.7 It is also important to recognise that early morning activity – with some cafes open as early as 0530 - can have an equally detrimental impact on residential amenity as late night activity.

POLICY KBR19: SECURITY AND RESILIENCE MEASURES

- A. Development proposals for commercial activities and Level 3 or larger developments are expected to demonstrate how appropriate and adequate security measures have been considered and incorporated into the design of buildings. This includes the use of state of the art and regularly maintained CCTV surveillance on all external walls, alarm systems and entry point locking.
- B. Developers for commercial activities and Level 3 developments are expected to seek and implement recommendations from the Metropolitan Police at the design stage to enhance the collective security of the Knightsbridge Neighbourhood Area against terrorist threats and minimise the potential for crime and anti-social behaviour including through close liaison with other local businesses.
- C. Development must take account of the need for resilience so that residential and business communities are better prepared for, and able to recover from, emergencies (including the promotion of business continuity measures).
- D. Development proposals implementing security or resilience measures should not have a detrimental impact on the public realm, either through their design or function.

Conformity reference: London Plan Policy 7.3; Westminster City Plan Policy S29

- 4.8 New development being designed in ways that helps to minimise criminal activity is strongly encouraged but in the Knightsbridge Area, much new commercial development in particular uses existing buildings. As such there is little opportunity to change design in a way that helps to make the area a safer place. Instead, the focus should be on new development, often in the form of a change of use or activity within an existing building, to ensure that security and surveillance is properly planned into the development proposals to minimise the risk of anti-social, criminal or terrorist activity and increase resilience.

Sub-objective 4.2 Ensure new food, drink and entertainment uses are only permitted in areas where they already exist and when residential amenity can be demonstrably protected

POLICY KBR20: RETAIL USES IN THE PRIMARY SHOPPING FRONTAGES

Within the International Shopping Centre's (ISC) primary shopping frontages along

Brompton Road and Knightsbridge the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the ISC will be assessed against the following considerations:

- a. maintaining a clear predominance of Class A1 units within the ISC, specifically by refusing changes of use where it would result in more than two in any five consecutive premises being in:
 - i. Class A3, Class A4 or Class A5 use;
 - ii. Class A1 use where it includes an element of ancillary A3 use relating to the sale of food and/or drink for consumption on the premises or hot food for consumption off the premises;
- b. maintaining more than 75% of the ISC's primary shopping frontage in active retail (Class A1) or professional service (Class A2) use.

Conformity reference: London Plan Policies 2.10, 4.7; Westminster City Plan Policy S21; Westminster UDP Saved Policy SS3

- 4.9 One of the major issues identified particularly by residents in the Area, is the significant number of cafés and sandwich bars along Brompton Road. This not only increases littering and a less than pleasant environment where there are smokers sitting outside, including shisha, but it was felt that this is serving to detract from Knightsbridge's retail offer. In addition, many of these new cafes and restaurants cater to the same offer – there is a lack of mid-range restaurants in Knightsbridge in particular which would serve the business market.
- 4.10 A review by the KNF of the units along the wider Primary Shopping Frontage in October 2016 showed that less than 20% of the ground floor units were occupied by international-quality retailers. Furthermore, less than 37% were in any form of retail (Class A1) use.

Sub-objective 4.3 Protect and enhance local amenity and retail services and commercial activities

POLICY KBR21: LOCAL RETAILING AND SERVICES

Change of use or development proposals that would result in the loss of retailers providing 'local' convenience retailing, banking and post office services in the Knightsbridge Neighbourhood Area will be resisted unless both of the following criteria are met:

- a. The existing use is no longer viable and this can be demonstrated through a sustained marketing campaign of at least 12 months.
- b. There is other equivalent provision within 400m walking distance of the proposal site.

Conformity reference: London Plan Policies 2.10, 4.7; Westminster City Plan Policy S21; Westminster UDP Saved Policy SS3

- 4.11 Whilst situated in Central London close to an International Shopping Centre, many in the residential community of Knightsbridge – including students at Imperial College – have identified a growing issue of access to basic facilities. In part down to the apparently uncontrolled

Deleted: .

conversion of existing A1 uses to A3. The ability to access places to buy a pint of milk or a newspaper, or to use post office or banking services, is not easy. The existing services in Knightsbridge, including the convenience stores on Brompton Road and at Imperial College, and the Post Office on Raphael Street, provide a vital service to residents, particularly older people.

4.12 Activities that will help to protect such uses across the Area will therefore be strongly supported.

POLICY KBR22: SMALL SHOPS AND PROFESSIONAL SERVICES

A. The provision of small (up to 150m² floorspace) retail (Class A1) and professional service (Class A2) premises suitable for small and independent businesses will be supported.

B. Conditions will be attached to planning permissions for Class A1 and A2 developments to remove their ability to combine units into larger premises, unless this would make the development clearly unviable, or, for developments in the International Shopping Centre, would conflict with Westminster UDP Saved Policy SS3

Conformity reference: London Plan Policies 2.10, 4.7, 4.9; Westminster City Plan Policy S21; Westminster UDP Saved Policy SS3

Comment [JA20]: I cannot really understand the point being made here. How can you apply a condition to a new development to prevent a future conversion - unless what is unviable?

4.13 Often such uses are lost because the owners of the property seek to expand the retail unit by combining it with adjacent units, which then can make it more attractive to large-scale, national multiple retailers. Furthermore – and of particular relevance in an International Shopping Centre such as Knightsbridge – this then results in rents and floorspace formats that are less attractive to small, independent retailers which do so much to increase the diversity and attractiveness of a retail centre.

4.14 It is important that the provision of new small retail and professional service units is encouraged along with the protection of existing units. Engagement with the freeholder of properties regarding matters such as rental levels and security of tenure is also encouraged.

POLICY KBR23: PROTECTION OF PUBLIC HOUSES

A. Applications to change the use of public houses and other community uses in the Knightsbridge Neighbourhood Area will be resisted other than change to a different community use.

B. Applications to change the use of public houses, including the Tattersalls Tavern and the Paxton Head, will be granted planning permission if both the following criteria are satisfactorily addressed:

- a. the existing public house has been actively marketed as such for a period of not less than 12 months; and
- b. this floorspace has been widely marketed at a reasonable market value and other terms for public house floorspace that are comparable to the market

Comment [JA21]: I think some text must be missing, I think I understand the point being made, but this text appears to be at least a bit opaque.

values for public house floorspace in that general locality.

C. Where a change of use of one of the identified public houses is permissible, proposals to bring forward social or community uses will be strongly supported.

Conformity reference: London Plan Policy 3.16

- 4.15 Over recent years, Knightsbridge has lost a number of its public houses, including the Tea Clipper, the Ennismore Arms and the Swag and Tails. There are only two public houses that remain in the Area, the Tattersalls Tavern on Raphael Street and the Paxton Head in Knightsbridge Green. It is important that community continues to be served by public houses or similar licensed premises. These public houses also have social or cultural value for particular groups in the community. In addition, it should be recognised that these two public houses have been in existence in the Area for a long time and are part of its history.

POLICY KBR24: SHARED COMMUNITY USES

Proposals to provide shared community and leisure (Class D) uses will be supported, subject to it being demonstrated that they will not have a detrimental impact on the amenity of neighbouring uses, particularly in respect of noise and traffic.

Conformity reference: London Plan Policy 3.16; Westminster UDP Saved Policy TACE5

- 4.16 The issue of limited access to basic services in Knightsbridge also extends to places for social and community activities. As the stock of residential property has increasingly been bought by investors on a 'buy-to-leave' basis, i.e. properties are being left empty for some or all of the year, the existing residential community have identified feeling isolated with a lack of activities that meet their needs.
- 4.17 Whilst Knightsbridge has a range of destinations and available activities, the evidence from the community is that this does not meet all needs. Therefore, proposals to improve the range of community activities in the Area will be welcomed.
- 4.18 Such provision does not have to be a stand-alone development and, given the lack of available premises, is likely to be provided as a shared facility. This could be of particular benefit in Knightsbridge due to the large range of differing groups that may get benefit from sharing spaces. A prime example are the students in the Strategic Cultural Area and the residential community.

POLICY KBR25: OFFICE USES

A. In order to protect the business base in the Knightsbridge Neighbourhood Plan Area, development proposals to retain or create Class B1 office space will be strongly supported.

B. The loss of Class B1 office space in the Knightsbridge Neighbourhood Plan Area will be resisted. Any development proposals that would result in such a loss must demonstrate that the existing office use is no longer viable and this can be demonstrated through a sustained marketing campaign of at least 12 months.

C. Any development proposals that would result in the loss of existing office uses at 1 Knightsbridge Green must also demonstrate that they meet the following requirements:

- a. Given its location within the Neighbourhood Stress Area and the associated impact on residential amenity, no provision of balconies or terraces will be permitted except at roof level.
- b. Given the existing ambient nitrogen dioxide concentrations, all servicing and/or car parking must be on-site and restricted to electric vehicles only in line with Policy KBR37 (Motor vehicle use) and KBR38 (Electric vehicle infrastructure).
- c. Given its location within the Knightsbridge Green Conservation Area and as a Local Building of Merit, use materials that provide a high quality external finish to the building.

D. The use of Article 4 directions by Westminster City Council to restrict the change of use of B1 office space to residential use in the Knightsbridge Neighbourhood Area will be strongly supported.

Conformity reference: Westminster City Plan Policy S20

4.19 The economy of Knightsbridge has a small but important office base. J Walter Thompson is a major international business that provides one of the largest concentrations of office-based jobs in the Area. Such businesses, which lease their premises, should be given the opportunity to continue to operate in the Area. From a corporate perspective this contributes to the image of many international companies. In addition, both the City Plan and the London Plan emphasise the importance of office provision as a strategic priority in the CAZ.

4.20 Permitted development rights do allow the conversion of offices to residential uses without the need for planning permission. However, some major redevelopments may require planning permission in respect of certain detailed matters and the intention of the policy is to resist that – and the associated loss of value and vibrancy that such occupiers bring to the Area - where possible. WCC is proposing to use Article 4 directions to restrict such permitted development rights within the Core CAZ, which does not include the KNA. However, in order to protect the existing office businesses within the area, the extension of such directions to include the KNA will be strongly supported by the KNF. The evidence supporting the Neighbourhood Plan in respect of the importance of the office buildings in Knightsbridge will be used to make the case to WCC for use of an Article 4 direction.

Comment [JA22]: I do not understand the point being made – I can perhaps guess, but the text may need amended.

Sub-objective 4.4 **Hold property owners accountable for actions emanating from their properties**

POLICY KBR26: HOUSEHOLD AND COMMERCIAL WASTE CONSOLIDATION

- A. Development proposals that provide dedicated non-recyclable and recyclable waste collection solutions to serve multiple commercial premises and residential households will be strongly supported. Such provision will only be supported if its design is discreet, elegant and low-level.
- B. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material. In order to protect visual amenity, such facilities should be suitably screened. Odour must also be mitigated.
- C. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer and emissions to air, land or water, should be incorporated on all Level 3 or larger developments. Its inclusion as part of other developments will be strongly supported.

Comment [JA23]: Same point as above. I think you mean the waste collection solutions will be supported, not any development that includes this will be supported automatically

Conformity reference: London Plan Policy 5.17; Westminster City Plan Policy S44; Westminster UDP Saved Policy ENV12

- 4.21 With the growing phenomenon of short term lets through the 'buy-to-leave' phenomenon and through companies such as Airbnb, there are increasing numbers of people living in Knightsbridge for a short period of time (as distinct from tourist visitors or business travellers staying for a few days in hotels). For such 'residents' the attachment to the area is often less than permanent residents and therefore there is less desire to look after the immediate environment through their actions. This also extends to the management companies looking after these properties. A common issue cited by residents is rubbish, which is often poorly managed and left on the street.
- 4.22 More generally, the issue of rubbish is one that has been raised by members of the community. At present, both non-recyclable and recyclable rubbish is required to be left out in bin bags on the street for collection. Not only does this result in large unsightly piles of rubbish bags but these are often ripped open by large birds or animals such as foxes or squirrels, resulting in rubbish being strewn across the street.
- 4.23 The provision of a system of waste consolidation for local streets would help to address this. Examples from Europe show that this can be provided using relatively little space.

Comment [JA24]: My European experience is that this causes a lot of problems and takes up a lot of space. There is also a big fly-tipping problem everywhere - including the small area of K&C where this is being trialled. We do not support this proposal in our area as we wish to maintain door to door collections and avoid rubbish piling up and blowing about. Such a proposal also is discriminatory against the disabled and less mobile who will not be able to carry their rubbish to communal points. See also comments made on Evidence section.

Sub-objective 4.5 Ensure construction impacts are managed and reduced

- POLICY KBR27: KNIGHTSBRIDGE CODE OF CONSTRUCTION PRACTICE**
- A. All development of Level 4 or greater must meet the requirements of the Westminster Code of Construction Practice and the Knightsbridge Code of Construction Practice.
 - B. Applications for Level 4 or greater development must be accompanied by the following:
 - a. A signed proforma Appendix A of the Westminster Code of Construction Practice which demonstrates that the applicant will comply with the relevant parts of

Westminster City Council's Code of Construction Practice and awareness of the need to comply with other public and private law requirements governing development. This includes the requirement for a draft or final Construction Management Plan to be provided at the application stage. The only exception shall be for minor works such as shopfront alterations.

- b. A signed copy of the Knightsbridge Code of Construction Practice, (Appendix B of the Knightsbridge Neighbourhood Plan) which demonstrates that the applicant will comply fully with the relevant parts of the Knightsbridge Code of Construction Practice where it is more stringent than the Westminster Code of Construction Practice.

C. Where necessary, contributions from development will be used to enforce the Code.

Conformity reference: London Plan Policy 5.18

- 4.24 Construction activity is a major issue for the residents of Knightsbridge. The nature of the residential area is that there is a lot of construction activity. In recent years this has increasingly been the development of large basements, a matter that is now being controlled through Westminster's City Plan. However, there is regular activity in residential properties with extensions, renovations and, in particular, enlargement and amalgamation of units.
- 4.25 Whilst construction activity is a fact of life, the nature of the improvements in the residential areas is that they involve many construction activities and require in many instances substantial activity over a prolonged period of time. The Local Roads that make up the residential areas of Knightsbridge are very sensitive to this activity and many people have identified that the disturbance is now largely a constantly ongoing issue.

Comment [JA25]: You may also wish to add refs to Section 60/61 (can't remember which) of the Environmental Protection Act where Councils can (but do not always) formally require developers to abide by it. It brings really good new protections!

5 OBJECTIVE 5.0 PROTECT AND ENHANCE EXISTING RESIDENTIAL AMENITY AND MIX

Sub-objective 5.1 Encourage a high proportion of occupied primary residences

POLICY KBR28: SHORT-TERM LETS

The change of use of existing buildings to allow short-term residential lets will be resisted, particularly where these are expected to total more than 90 nights in any calendar year.

Conformity reference: London Plan Policy 3.8; Westminster City Plan Policy S15

- 5.1 One of the reasons why residents consider that the vibrancy of the area needs improving is that a large proportion of the existing stock of properties are sitting empty. In 2011, 11% of Westminster borough's household spaces had 'no usual resident'; in the Knightsbridge Area this was 32%². Much of this is due to 'buy-to-leave' but also a large number of these properties are being rented out on short term lets. This creates significant amenity issues for permanent residents through large amounts of rubbish being left out on the street and with increased levels of late-night activity by people often staying in the area on holiday or on business.

Sub-objective 5.2 Encourage new residential developments to provide a range of housing in value and size

POLICY KBR29: RESIDENTIAL MIX, INCLUDING HOUSING TO SUPPORT LOCAL WORKERS AND STUDENTS

- A. Major residential development (Level 1 or Level 2 as described in Appendix D) will be supported which provides for a mix of residential unit sizes that are in keeping with the scale, context and character of the area (see also Policy KBR1). Applicants will be required to demonstrate how their proposal accords with the identified housing demands in the most up-to-date housing market assessment.
- B. Proposals to deliver affordable or rental housing (that complies with all other policies in this plan and with other national and local policies and does not reduce space currently devoted to cultural/educational uses) which addresses the housing needs of students or employees that work within the Neighbourhood Area will be strongly supported. This is particularly the case for students and workers in the Strategic Cultural Area.

Conformity reference: London Plan Policy 3.8; Westminster City Plan Policy S16; Westminster UDP Saved Policy H4

Comment [JA26]: We continue to oppose this text which, while an improvement, does not give the precedence to local residents which they should have in cases of affordable housing. Such provisions might be acceptable where the provision indirectly benefits residents eg, homes for nurses working anti-social hours at local hospitals, but students and workers are not a comparable case. Please delete. If institutions have a problem recruiting they may be to pay more/reduce fees.

² Source: 2011 Census

- 5.2 Feedback from the community has identified that it is considered particularly important that mid-sized properties are provided in the Area. These two- and three-bedroom properties address a wide range of needs and are generally in need in Knightsbridge.
- 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 affordable housing for those people who work there as 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 Any 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, will be strongly supported.

Comment [JA27]: Please delete for the reasons set out above. This unqualified support is also unbalanced – all statements should be qualified by a requirement to comply with all other policies.

Sub-objective 5.3 **Encourage the restoration of period and other residential buildings to their original size and configuration where this will increase the number of units and discourage the loss of residential units**

POLICY KBR30: RECONFIGURATION OF EXISTING RESIDENTIAL BUILDINGS

- A. Development proposals to restore existing residential properties to their original built form will be supported where they increase the number of residential units. In particular, support will be given to applications that:
- a. restore existing lateral or vertical conversion flats or maisonettes to their original form; and/or
 - b. restore double fronted houses to their original form; and/or
 - c. bring empty properties or derelict buildings back into use; and/or
 - d. ; and/or
 - e. otherwise increase the number of residential units.

Deleted: convert garages to residential accommodation

B. Where development would result in a net loss of residential units, this will only be acceptable if it can be demonstrated that all the residential units that would be lost have been empty for a continuous period of at least three years.

Comment [JA29]: Please amend - thanks to buy to leave this is an incredibly easy policy to meet. Add something about marketing? And not allowing it to fall into disrepair deliberately?

Conformity reference: London Plan Policy 3.8; Westminster City Plan Policy S14; Westminster UDP Saved Policy H5

- 5.5 There are situations that arise in Knightsbridge where the opportunity should be taken to restore buildings back to their original size and configuration and also increase the number of residential units. In particular in Knightsbridge this relates to lateral conversions and the combining of two adjacent houses into one, double-fronted property.

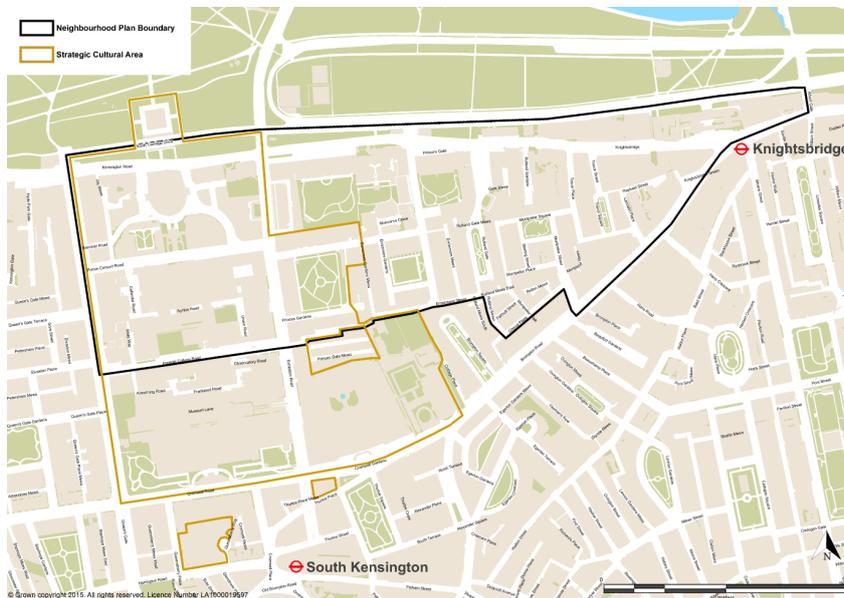
- 5.6 The community felt that this existing type of residential configuration does not provide effectively for the housing needs of the local community and that any opportunity to return these buildings to their original status, i.e. as two residential units should be supported.

KNIGHTSBRIDGE'S CULTURE AND EDUCATION

Objectives	Sub-objectives	Policies
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	<p>6.1 Support the educational and cultural institutions in progressing plans that will enable them to remain world-class in their respective fields within a flourishing community</p> <p>6.2 Enhance the public realm to provide a clean, safe, attractive, welcoming and accessible place that meets the needs of residents, workers, students and visitors</p>	<p>KBR31: New development within the Strategic Cultural Area.</p> <p>KBR32: Public realm within the Strategic Cultural Area.</p>

The policies in this section focus on the Strategic Cultural Area. The boundary of this stretches beyond the boundary of the Neighbourhood Plan area, as is shown in Figure 4 (the brown boundary signifies the Strategic Cultural Area). All policies that refer to the Strategic Cultural Area only relate to that part of the Strategic Cultural Area which is within the Neighbourhood Plan Area.

Figure 4: Strategic Cultural Area



Comment [JA30]: Please specify the exact origin of the proposed SCA area marked. If this is a self-devised map, please say so and remove any reference to areas (in text or maps) that are outside the area of the Neighbourhood Plan as it is not for the KNF to designate areas outside its ambit as anything it considers it to be – still less is it for the Forum to set policy outside its area – which is what this section does. Please also amend the maps in the same manner in the rest of the document.

Comment [JA31]: How and why does it go outside the area in this manner? As I have asked before - whose map is this? I can find no official reference to any such map.

6 **OBJECTIVE 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**

Sub-objective 6.1 **Support the educational and cultural institutions in progressing plans that will enable them to remain world-class in their respective fields within a flourishing community**

POLICY KBR31: NEW DEVELOPMENT WITHIN THE STRATEGIC CULTURAL AREA

A. Proposals for new development within the Strategic Cultural Area will need to demonstrate that they contribute positively to the special character of area. Where relevant, new proposals will be assessed against the following criteria:

- a. Existing cultural, education and research uses within the Strategic Cultural Area which contribute positively to the character of the area and the original ambitions of the 1851 Royal Commission will be protected. Proposals which involve the loss of these uses will be refused.
- b. New development for cultural, education and research uses, particularly new development which will make a contribution to the Area's special character will, subject to the 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, or harm residential amenity.
- c. Ancillary developments which help to broaden the appeal and promote the merits of cultural, education and research organisations to a wider audience will be supported.

B. New development for non-cultural or education uses within the Strategic Cultural Area will only be permitted if it can clearly be demonstrated that it will not undermine the current and potential future success of the Strategic Cultural Area.

Conformity reference: London Plan Policy 4.6, Westminster City Plan Policy S1

Comment [JA32]: This objective is too sweeping and too unbalanced – it favours the institutions at the expense of all other users. This goes well beyond fostering an environment to outright unbalanced favouritism and is hugely sweeping, open-ended is specifying merely 'plans' will be supported and subjective and untestable in that who is to define "remain world class". The text here should also discuss the large number of residential buildings in Exhibition Road, many of which are listed and which are historically significant in the development of the area (and existed before many of the institutions were even founded). Only by including institutions outside the area of the Plan and using a very broad definition of cultural can the wider area be said to be dominated by/majority use by cultural bodies. In the KNF's own area, the land-use is, if anything more residential than cultural and the plan should reflect this.

Comment [JA33]: Please define your authority for selecting and referring to this space and please be explicit this entire section only refers to within the Forum's boundary

Comment [JA34]: Please delete as without clarity this is worrying, unlimited and unbalanced and will have a profound impact outside the area of the KF.

Comment [JA35]: Please delete as support is unqualified and far too sweeping and unbalanced

Comment [JA36]: Please delete as support is unqualified and far too sweeping and unbalanced – this is a residential area! Again, please clarify what Area you are referring to.

- 6.1 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 of the Strategic Cultural Area, 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.
- 6.2 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.

6.3 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.

6.4 The Strategic Cultural Area does not sit within a designated retail centre or identified parade. Any ancillary commercial development will need to ensure it does not draw trade away from established commercial centres in the vicinity. Such development should not serve as an attraction in its own right and should be sited, serviced and managed within the associated host institution.

Sub-objective 6.2 Enhance the public realm to provide a clean, safe, attractive, welcoming and accessible place that meets the needs of residents, workers, students and visitors

POLICY KBR32: PUBLIC REALM IN THE STRATEGIC CULTURAL AREA

A. Development proposals that affect existing or provide new public space or impact on existing traffic management measures in the Strategic Cultural Area will be expected to demonstrate **they have have no harmful impacts on residential amenity and how they will improve the quality of the public realm, and the movement network in and around the Strategic Cultural Area.**

B. Proposals will be expected to show how the interests of established residents are balanced by the interests and operational requirements of the cultural, education and research bodies to ensure the local environment is managed to the satisfaction of all users. The aspiration is to deliver a clean, safe, attractive, welcoming and accessible environment that meets the needs of residents, workers, students and visitors.

C. Key issues and opportunities regarding the public realm within the Exhibition Road area include:

a. The key cultural, education and research partners will continue to work together alongside local residents to progress public realm improvements to the area around the exterior of the Royal Albert Hall and its physical connection with the Albert Memorial – referred to as the Re-Imagining Albertopolis initiative.

b. Temporary use of buildings and spaces for events and other pop-up activities can contribute significantly to the character of the area. **Equally they can harm residential amenity, even** if appropriately managed. **Any s** temporary events should, however, be appropriate to the Strategic Cultural Area and the mission and activities of the cultural and educational institutions **and follow the provisions set out in the Key Decisions on the Use of Exhibition Road 2011.**

Conformity reference: London Plan Policy 4.6, Westminster City Plan Policy S1

Comment [JA37]: this text remains totally unbalanced. This area is highly residential and it is completely unacceptable to suggest all development should be for the purposes of the Vision only. Please amend to make clear this applies only to new development where the existing use/ownership of the buildings/space is education/science/art.

Comment [JA38]: Again, far too sweeping and unbalanced. Please delete

Comment [JA39]: Yes it does (South Ken – unless you are referring only to within the KF area, in which case this should say so..

Deleted:

Comment [JA40]: This is profoundly the wrong way round – the institutions, as the ones bringing forward proposals should have to demonstrate they will not harm residents or any other stakeholders – demonstrating balance is a very very weak (weaker than current planning policy) test and very subjective. This text needs much greater clarity as to what is meant. Planning policy already covers all these issues. If something new is being sought, it should be specified clearly. If nothing new is being sought, there is no need for this text. Residential amenity cannot be 'balanced' against the needs of others in every case – there are absolute levels beyond which amenity may not be damaged.

Deleted: and will be supported in principle, subject to appropriate management arrangements

Deleted: S

Comment [JA42]: Cannot support this text. Even if qualified by a specific reference to this policy not amending the policy on use of Ex Rd as currently agreed (cf the helpful ref on the Evidence text) this text goes beyond the coverage of the Ex Rd policy document and is unbalanced and inappropriate. The text, by paraphrasing the Decision, undermines it. The reference to temporary events is sweeping, and will have significant impacts on those outside the Forum Area. Changes to the Key Decision – which this text would require – would have to be agreed with the Borough of K&C and so this is outside the power of the Forum. This text should be deleted.

- 6.5 The Exhibition Road environment is a result of years of planning and collaborative working between a wide range of agencies and has transformed a normal road into an exceptional public space. This has delivered radical improvements to the pedestrian links which people enjoy between the area's principal venues. Importantly, whilst these benefits have been delivered, the improvements have also enabled Exhibition Road's other important functions as a key vehicular route through the area and principal vehicular and heavy goods vehicle (HGV) access route for the main institutions in the area to continue.
- 6.6 Building on the successes of Exhibition Road, a number of key opportunities have emerged to deliver further public realm improvements across the Strategic Cultural Area. In particular this relates to 'Re-Imagining Albertopolis' which is intended to deliver significant improvements around the Royal Albert Hall and, in particular, improve the links between it and the Albert Memorial. Such improvements should be designed to improve the physical links between institutions through an improved public realm to help improve their operations, foster more collaborative forms of working and improve access to the area's venues for visitors, employees and residents alike.

KNIGHTSBRIDGE'S PUBLIC SPACES AND UTILITIES

Objectives	Sub-objectives	Policies
7.0 Active travel and personal mobility	<p>7.1 Active travel that is encouraged, promoted and available for everyone</p> <p>7.2 Pedestrian and mobility-impaired priority within a movement hierarchy</p> <p>7.3 Safe and quiet roads where there are no deaths or injuries from transport and where local access is allowed and noise and traffic speeds reduced</p> <p>7.4 Promoting walking and cycling</p> <p>7.5 Fewer and cleaner vehicles that reduce congestion and total emissions</p> <p>7.6 Electric charging infrastructure that is future proofed</p>	<p>KBR33: Enabling active travel</p> <p>KBR34: Movement hierarchy</p> <p>KBR35: Safe and quiet roads</p> <p>KBR36: Cycling and walking infrastructure</p> <p>KBR37: Motor vehicle use</p> <p>KBR38: Electric vehicle infrastructure</p>
8.0 Encourage superb public transport	8.1 Efficient mass transit	KBR39: Public transport
9.0 Encourage superb utilities and communications infrastructure	9.1 Exemplary utilities and connectivity	KBR40: Utilities and communications infrastructure

7 OBJECTIVE 7.0 ACTIVE TRAVEL AND PERSONAL MOBILITY

- 7.1 In busy Central London neighbourhoods such as Knightsbridge, walking and cycling – ‘active travel’ - are often the quickest ways of getting around. They also often represent parts of longer journeys using the Underground in particular. However, they have separate benefits of improving health through exercise and reducing harmful vehicle emissions. The concept of ‘active travel’ is therefore seen as an important objective for Knightsbridge. The intention is that all future development in the Area will improve conditions for personal mobility.
- 7.2 In Knightsbridge there is a clear distinction between the main arterial routes that carry the majority of traffic e.g. Brompton Road, Exhibition Road, Knightsbridge, Kensington Road and Prince Consort Road, and the smaller network of roads that are internal to the area. This network of Local Roads is particularly important for increasing active travel. These are shown on the Proposals Map.

Sub-objective 7.1 Active travel that is encouraged, promoted and available for everyone

POLICY KBR33: ENABLING ACTIVE TRAVEL

- A. All development must maximise opportunities for its occupiers/users and others to engage in safe active travel. Development should provide additional or improving existing inclusive mobility infrastructure for cyclists and pedestrians or facilities which support and enable active travel (e.g. way finding, secure cycle parking and showering facilities/lockers in commercial developments). This should reflect the needs of all cycle users, e.g. push scooters, tricycles, recumbent cycles, etc.
- B. Development which reduces the capacity or safety of the existing active travel infrastructure or that removes important local facilities will not be acceptable.
- C. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
- road dangers;
 - pedestrian environment and movement;
 - cycling infrastructure provision;
 - public transport; and
 - the street network.
- Where necessary, this should be demonstrated through a Transport Assessment or Travel Plan.
- D. Development which contributes to the installation of new cycling routes and traffic calming will be supported.
- E. The provision of secure on-site cycle parking will be required to at least be in line with the standards in the London Plan (Table 6.3). Applicants are strongly

encouraged to exceed these standards.

F. On-street cycle parking in suitable locations where there is a demonstrable need will be encouraged. This should follow the guidance in the Cambridge Cycling Parking Guide 2008 or any successor document.

G. The provision of cycle hire facilities will be strongly supported.

Conformity reference: London Plan Policies 6.9, 6.10; Westminster City Plan Policy S41; Westminster UDP Saved Policies TRANS3, TRANS9, TRANS16

- 7.3 Active travel is important in modern society. A lack of physical activity is harmful, contributing to an increased risk of type 2 diabetes³, cardiovascular disease⁴ and cancer. An increase in active travel can help reduce these health risks, the emission of air pollutants and the number of cars in the Area. An increase in active travel in the Area will therefore complement other policies in the Plan and it is an important objective that development supports the uptake of active travel.
- 7.4 Currently there are barriers to active travel in the Area and moving between the Area and adjacent neighbourhoods. In particular, access to Hyde Park is difficult, requiring the crossing of busy vehicular routes in Kensington Road and South Carriage Drive. Also, Brompton Road represents a significant barrier to movement into and out of the Area. Equally however, it is important that any improvements do not encourage significant additional tourist and visitor pedestrian movements through the Local Roads which because of their size and configuration, are not suited to large volumes of pedestrian movement.
- 7.5 In addition, there is a lack of infrastructure to make cycling and walking easier. One particular issue is the lack of bicycle parking, including secure parking. Several students and workers from the cultural and educational institutions requested the provision of more cycle hire docking stations and secure bicycle parking for private bikes. One large local business has reported that it has a waiting list of over 100 of its employees to use its secure bicycle parking facilities. Guidance provided by the Cambridge Cycling Campaign⁵ should be used to plan for cycle parking.
- 7.6 Proposals to improve accessible walking and cycle movement will be supported and the WCC Walking and Cycling Strategies are also supported in this regard. Such provision should become an intrinsic part of all development and uses that attract people should build active travel into their developments. For example, new businesses should seek to provide shower and locker facilities and secure bicycle parking for cyclists.

Sub-objective 7.2 Pedestrian and mobility-impaired priority within a movement hierarchy

³ Pucher et al, Am J Public Health. (2010) October; 100(10): 1986–1992, 'Walking and Cycling to Health: A Comparative Analysis of City, State, and International Data'

⁴ Hamer and Chida, Prev Med. 2008 Jan;46(1):9-13. Epub 2007 Mar 20, 'Active commuting and cardiovascular risk: a meta-analytic review'

⁵ Cambridge Cycling Campaign (2008) *Cambridge Cycle Parking Guide, How to provide cycle parking: a step-by-step guide for planners and providers*

POLICY KBR34: MOVEMENT HIERARCHY

- A. Any development that provides new transport infrastructure or improvements to existing transport infrastructure should be designed to maximise its potential for use by the following:
 - a. pedestrians and mobility impaired
 - b. cyclists
 - c. public transport
- B. On Red Routes and the Strategic Route Network, this must not compromise Westminster City Council and/or Transport for London's ability to carry out their statutory network management duties under the 2004 Traffic Management Act.
- C. Development is expected to facilitate pedestrian movement and must not adversely impact upon the existing pedestrian infrastructure. Suitable pedestrian routes should be provided around and, where appropriate, through new developments.
- D. Development that results in the loss of existing pedestrian routes or footpath and pavement space more generally will be resisted unless an alternative pedestrian route and/or new footpath/pavement space is provided to at least an equivalent standard. Such provision should have regard to:
 - a. the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods; and
 - b. the shortest practicable routes between relevant points.
- E. Development proposals which replace a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
- F. The provision of public access across private land as part of development proposals will be encouraged where it enhances the connectivity, legibility and capacity of the Knightsbridge Neighbourhood Area's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
- G. Development proposals which contribute appropriate additional pedestrian infrastructure or enhance existing pedestrian infrastructure in a way that complies with national guidance on inclusive mobility will be supported.
- H. Any development proposals which enhance the safety space where only bicycles are allowed (and not cars), before the allocated area for pedestrians to cross Brompton Road, will be highly encouraged.

Conformity reference: London Plan Policies 6.9, 6.10; Westminster City Plan Policy S41; Westminster UDP Saved Policies TRANS3, TRANS9, TRANS16

- 7.7 Pedestrian safety is key to a high quality place. Particularly in a busy Central London neighbourhood such as Knightsbridge, this is an ongoing issue. Moreover, pedestrian safety is an issue even in the residential parts of the Area, with car movements and construction activity creating difficulties for pedestrians looking to use these quieter roads to move about safely. This is particularly an issue for the most vulnerable users, i.e. mobility impaired people and children.

7.8 It is considered that development should take account of the needs of the most vulnerable road users in a way that promotes safety. Development of improved pedestrian and bicycle movement should be prioritised over vehicular transport improvements on Local Roads throughout the Area. This would work in tandem with a 20mph speed limit on all Local Roads.

Sub-objective 7.3 **Safe and quiet roads where there are no deaths or injuries from transport and where local access is allowed and noise and traffic speeds are reduced**

POLICY KBR35: SAFE AND QUIET ROADS

A. Development which includes measures that are designed to improve the safety of all road users and pedestrians will be supported.

B. Development which includes measures to improve the public realm that are likely to reduce nuisance noise and traffic speeds will be supported. This is particularly the case for Local Roads, as shown on the Proposals Map.

Conformity reference: London Plan Policies 6.9, 6.10; Westminster City Plan Policy S41; Westminster UDP Saved Policies TRANS3, TRANS9, TRANS16

7.9 It is important that Knightsbridge's roads are safe. Development which, through innovative design, helps to achieve this by serving to slow the traffic or improve safety for pedestrians and cyclists, will be supported.

Sub-objective 7.4 **Promoting walking and cycling**

POLICY KBR36: CYCLING AND WALKING INFRASTRUCTURE

New development that contributes towards the following improvements to cycling and walking infrastructure will be strongly supported:

- The implementation and improvement of the Central London Cycle Grid, the East-West Cycle Superhighway and the planning of further cycling routes through the Knightsbridge Neighbourhood Plan Area.
- The provision of segregated cycle tracks along Brompton Road, subject to these not slowing down bus movement or reducing the amount of pavement space.
- Measures to reduce traffic along Exhibition Road and the provision of segregated cycle tracks.
- Implementing contra-flow cycling along Local Roads, i.e. cyclists able to cycle in both directions along one-way streets.
- The need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists.
- The expansion of the cycle hire network including providing additional capacity and better operations at the following existing locations:

Comment [JA43]: Again – suggest clarify to say that the elements which improve safety will be supported, but NOT the whole of any development which does this

Comment [JA44]: Please delete – this affects an area outside your plan area profoundly and you have clear evidence many local residents would not support these proposals.

- i. the Imperial College site in Queen's Gate;
- ii. the junction of Exhibition Road and Prince Consort Road;
- iii. Kensington Road in front of the Royal College of Art
- g. The provision of secure cycle parking along Raphael Street where it meets Knightsbridge Green (replacing the existing motorcycle parking).
- h. The provision of additional cycle hire docking stations, along with associated opportunities for large employers to hire these 'in bulk' for use by their employees.
- i. Improvements to local signage and route planning through measures including:
 - i. the installation of Legible London signage;
 - ii. the official marking of walking and cycling routes; and
 - iii. clearer signage and road markings indicating the movement hierarchy along Local Roads, including the use of 'Copenhagen crossings'⁶; and
 - iv. the provision of pollution avoidance advice and alerts.

Comment [JA45]: Elsewhere the plan says this is a really dangerous spot – adding further obstruction could be dangerous

Conformity reference: London Plan Policies 6.9, 6.10; Westminster City Plan Policy S41; Westminster UDP Saved Policies TRANS3, TRANS9, TRANS16

- 7.10 As part of the development of a comprehensive strategy to maximise active travel, it is important that the respective roles of the Mayor and Transport for London (TfL), WCC and KNF are differentiated. Activity at the most local level dealing with providing practical support for improved transport infrastructure and actions is the responsibility of the Plan. This relates mainly to walking and cycling, reflecting the fact that the main aim of this activity will be to facilitate improved local movements within the Area.

Sub-objective 7.5 Fewer and cleaner vehicles that reduce congestion and total emissions

POLICY KBR37: MOTOR VEHICLE USE

- A. All new development in the KNA should be motor vehicle-free except for designated Blue Badge spaces.
- B. All development should seek to maximise its potential for construction, delivery, freight and waste and recycling consolidation plans including zero emission 'last mile' services.
- C. Development which significantly increases the number of motor vehicle movements in the Neighbourhood Plan Area will be resisted except in exceptional circumstances.

Conformity reference: London Plan Policies 5.1, 5.2, 6.13; Westminster City Plan Policy S40; Westminster UDP Saved Policies TRANS1, TRANS14, TRANS21-26.

⁶ Copenhagen crossings alter the priority for cyclists at junctions, allowing them to continue on without stopping at certain junctions. This is achieved through the use of painted areas on the road surface and also possibly the raising of the road surface to help vehicle drivers to identify that such a priority is approaching.

- 7.11 It is an important objective of the Plan to bring about a lifestyle change so that all residents, workers and visitors to the Area become less reliant on fossil fuel vehicles. Reduction in the amount of fossil fuel powered vehicles in the Area will help contribute to the health of the people and the environment. Fewer cars will mean less tyre and brake wear which is a significant source of particulate matter in the air. Tailpipe emissions are another major source of pollution that can be eliminated at point of use. Wherever possible, renewable energy sources with zero emissions should be used to generate electricity e.g. solar or wind.
- 7.12 As such, it is seen as important that new development does not encourage motor vehicle use. However, in order to achieve the Vision of Knightsbridge being the best, then development should strive to be motor vehicle-free. In working towards this goal, the reduction in vehicles could be achieved through the increased use of car clubs, particularly to serve residential areas.

Sub-objective 7.6 Electric charging infrastructure that is future proofed

POLICY KBR38: ELECTRIC VEHICLE INFRASTRUCTURE

A. In order to reduce the environmental impact of vehicular pollution, new development (Level 1 to Level 4) that provides for convenient use by electric vehicles (cars, vans or lorries) including recharging will be strongly supported. In particular, such new developments will be encouraged to deliver or contribute towards the provision of new and future-proofed motor vehicle parking spaces with six-hour or faster electric vehicle charging points (or wireless charging facilities) that are affordable, reliable and resilient at each new motor vehicle parking space. These should be 22kW or faster.

B. All development is encouraged to contribute to the provision of new and future-proofed electric vehicle charging points (or wireless charging facilities) in the Knightsbridge Neighbourhood Area, including in metered and resident parking bays, which have two or six hour or faster charging points (or wireless charging facilities) respectively. These should be 22kW or faster and affordable, reliable and resilient. In particular, support will be given to development that contributes towards the installation of 30 minute or faster rapid electric vehicle charging points (or wireless charging facilities) that are affordable, reliable and resilient for existing or new taxi ranks, stands or rests:

- a. near the Royal Albert Hall;
- b. in Prince Consort Road;
- c. in Montpelier Street between Cheval Place and Brompton Road;
- d. Raphael Street; or
- e. in Knightsbridge Green.

Conformity reference: London Plan Policies 5.1, 5.2, 5.7, 5.8; Westminster City Plan Policy S40; Westminster UDP Saved Policies TRANS1, TRANS7

- 7.13 Where development does provide additional space for motor vehicles, the focus should be on provision for electric and plug-in hybrid vehicles. Such vehicles create zero exhaust emissions compared with traditional vehicles and therefore have a far lower impact on the environment generally and pollution levels in particular. This can be enhanced if the electricity that is created to power them comes from renewable sources.

- 7.14 Development should therefore provide the facilities to enable the residents, workers and visitors to the area to use electric motor vehicles by installing charging points.
- 7.15 A separate issue relating to parking spaces that should be addressed immediately is the use of resident parking spaces on Local Roads by waiting minicabs. Commonly the quiet residential areas of Knightsbridge are used as a 'staging post' for minicab drivers waiting for their next job. Often these minicabs wait with their engines idling which serves to create additional pollution. Due to the increased traffic and issues that arise from loitering of drivers and customers, it is not considered appropriate to have new mini-cab offices within the Area.
- 7.16 The same concerns apply to driverless cars which are a technology likely to become a mainstream reality over the lifetime of the Plan. It is important that Knightsbridge does not become a staging post for these vehicles either.

Jane Whewell comments 130217

Certain text appears in several places in different documents – please can comments below on one section of text be taken to cover also near-identical text that appears elsewhere in other Forum documents.

Vision Values and objectives

10. Please can ‘best practice’ be defined somewhere as otherwise it could cover almost anything. Eg “best practice published by a recognised authority on the topic” or words to that effect.

Priorities and Timescales

There are very frequent (too frequent?) plans to refresh the Plan – which could lead to consultation fatigue and a lack of stability. Suggest only 2 reviews not 3. Also, please can the plan say something about the consultation process for any future refresh of the Plan. Please also can the plan make clear that any discussion with Kensington and Chelsea Council on cross-border matters MUST include fully transparent prior consultation with residents in Kensington and Chelsea. Kensington and Chelsea residents hugely value their door to door waste collections – particularly critical for those who are mobility impaired. We do not support the proposals for communal recycling and waste facilities – which based on recent experience of an experiment in part of the Borough of K&C are unsightly, noisy and attract vermin and fly-tipping. Such proposals also discriminate against the disabled and mobility impaired.

Part 1

See **Comments on Word document** (references below to ‘see comments made above’ will also refer to comments made on the Word document).

Map Figure 2

There are significant inaccuracies in the observed uses in this map both inside and outside the Forum’s area. Eg. residential inaccurately marked as cultural and vice versa and residential institution marked as residential and several shops are not marked and additional shops are not marked. We should be happy to draw amendments on the map if given access to a large copy of the map.

References to the Strategic Cultural Area and the depiction on the map do not reflect any official map of a strategic cultural area we have been able to identify. (Para ii.16 of the Evidence base refers to London Plan Policy 4.5 and Map 4.2 – but the references bear no resemblance to the Maps in Part 1). If the Forum is inventing its own map, this should be made clear – and its designation of any self-defined cultural area should not extend outside its own area of coverage. If this SCA boundary drawing relates to a specific map then its exact reference should be cited so that citizens can identify it.

Part 2 – Neighbourhood Management Plan

Please can much more be said about the legal status and standing of this document. Is it an aspiration? Who is required to have regard to it? The status is particularly important as the Plan is apparently not to be subject to Examination or the Formal Referendum.

Para 2.7 – see comments elsewhere about the Area of Interest and again there needs to be a lot more clarity about the status of this document and what if any formal bearing it can have on areas outside the Forum’s patch.

Para 2.9 says it will be important to work with others – can with whom and how work with them will take place be specified or at least illustrated.

Objective 4.4 28 and Project list Objective 15 (page 26) – we would oppose recycling and waste consolidation sites for reasons discussed elsewhere.

Objective 6.0 6.1 – this text needs to specify that such “support” will only be given if the ‘plans’ are compliant with all other Westminster Council policies and Knightsbridge Neighbourhood plan policies.

Objective 7.4 – Kensington and Chelsea has a cycle contraflow already in the Thurloes. It has proved a nightmare and a danger to pedestrians. We would not support this anywhere that would affect Kensington and Chelsea. Similarly, we cannot support any change to Exhibition Road (other than signage) to favour cyclists over other road users – any segregated space or priority given to cyclists would increase danger to pedestrians (we already have a significant problem with cyclists in the Road ignoring the needs of pedestrians) and obstruct further necessary traffic.

Objective 10 – Please can you clarify some where what you mean by “best practice” – eg “by a recognised authority on the topic at issue”.

Policy KBR41 – can you add a reference to the environmental impact of the actual construction potentially being an issue? There is a K&C basement just applied that wants 30 spoil lorries a day for 2 years apparently – I think the environmental impact of that construction alone should result in the application being refused.

Policy KBR45 D. Please can proposals “to fell” be removed from the header – this is surely not something that can be “strongly supported”.

Developer Contributions – B and C – please can bus stop improvements explicitly rule out advertising on any stop where such funds are used? At present advertisers are making a fortune from ‘bus stop’ advertising while removing the actual shelter (and any public service at the same time) of the bus stop opposite the Oratory, which used to have a shelter..... We do not agree the blanket unqualified suggestion that such funds should be used for the commercial development of Albertopolis. If there must be a reference, then it should be limited to funding elements that give a demonstrable public benefit and NOT commercial advantage to any player.

Glossary

Area of interest (see all other comments about this topic). This text should give the legal definition of an area of interest, not simply list the areas chosen.

Strategic Cultural Area - See all other comments about this topic – this text MUST specify the very large number of residents in this area and confine the text to an approved official map. I can find no trace of any official map which looks like the map devised by the KF. In fact, in the area within the KF actual area the institutions are in the minority.

Code of Construction Practice

B4.4 – the ref to “unless it is impractical” needs to be defined tightly or every developer will just say it is impractical.

B54.2 – the requirements in K&C on noisy work are v much tighter than this and better for residents. Suggest you adopt the shorter K&C hours for noisy work.

C2.1 – Developers - elsewhere in the papers the requirement is the nearest 25 properties and I would favour this over the “10” proposed here as with projects of this nature it is easily possible more than 10 people will be closely affected..

C2.1 – Council – suggest you add a requirement to publish any pre-application advice at the same time (and in the same place on the website) as the associated application is published.

Evidence Base

ii.10 This states some parts of the area are lacking in choice for “cafes, bars and restaurants” for workers but gives no evidence for this assertion: what is the evidence? In the wider context of a continued battle to prevent every useful shop turning into a café this sentence is also very unhelpful. This text is also discordant/conflicting given the policy set out elsewhere to confine such uses to areas where they already exist. Residents in the south of Exhibition Road and South Kensington have (and will) resolutely oppose any commercialisation and in particular any additional restaurants and cafes north of Cromwell Road. Please can the ‘evidence’ also record (there is plenty of it!) that many residents have however opposed additional restaurants and bars given the damage they do in eroding non-food A1 uses and impact on residential amenity.

Para ii.16 and Figure 6.2 As mentioned previously, references to the Strategic Cultural Area and the proposed map do not reflect any official map of a strategic cultural area we have been able to identify. Para ii.16 of refers to London Plan Policy 4.5 and Map 4.2 – but these bear no resemblance to the Map in Part 1. If the Forum is inventing its own map, this should be made clear – and it’s designation should not extend outside its own area of coverage. The evidence base should also record the basis for the Maps and comments in relation to the Strategic Cultural Area in Part 1 and the Management Plan.

A reference to Westminster’s own plan may be useful to add. It states “3.43 *The western side of Knightsbridge, around Exhibition Road and Kensington Gore, contains a concentration of specialist and world-renowned arts and cultural facilities and is designated a Strategic Cultural Area. This area includes the Royal Albert Hall and Albert Memorial, the Serpentine Gallery, the Royal College of Art and the Royal College of Music, and forms a centre for higher education and research dominated by Imperial College London. There are also a few small hotels within this area.*”

The evidence base should also discuss the large number of residential buildings in Exhibition Road, many of which are listed and which are historically significant in the development of the area (and existed before many of the institutions were even founded). Again, residents have given evidence on this topic many times and the current evidence base in relation to this area is not balanced. Only by including institutions outside the area of the Plan and using a very broad definition of cultural can the wider area be said to be dominated by/majority use by cultural bodies. In the KNF’s own area, the land-use is, if anything more residential than cultural.

The photo caption text says Exhibition Road is “impassable” – is this a typo?

1.26 – there is a heritage post box in Imperial Institute Road that is not marked on the map and I think is in the KNF area. We worry this box has been recently moved deliberately to a hidden spot so that it can be removed later as ‘not needed’. Please can this be added to the map so it can be protected? It is very near Exhibition Road, but currently is hidden by hoardings.

2.4 and 2.5 These comments/judgements will affect areas well beyond the Forum’s area – we would not support narrowing Brompton Road or local roads to make more room for pedestrians. If the cafes are narrowing the pavement, the solution is to have a new policy on the cafes’ use of them and/or remove them, not narrow the road (and removing cafes will be far cheaper and easier to do than narrowing the road). On local roads, narrowing will just result in car diverting to other streets and increased access difficulties.

2.6 Please amend as follows – again this text is unbalanced in favour of the institutions “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 or their agents to have swift un-fettered vehicular access to their homes should be explored. “

2.12 Please amend to add that advertising on bus stops should be restricted and where shelters are removed they should not be replaced by advertising. In the last 6 months, JC Decaux have removed multiple bus shelters from the street in K&C and Knightsbridge (without any prior consultation and removing a service (shelter) from visitors and residents) and replaced them with free-standing brightly lit moving advertising panels. Their sole function is as advertising. These clutter the street and should be removed.

2.15 See comments and suggestions for proposed changes made above re advertising being acceptable in principle – this statement in fact weakens existing controls.

4.3 See comments made above about waste consolidation. Please state where in the EU such systems are elegant and use little space. My experience is the reverse - in several countries!

4.31 We would strongly oppose a site east Of Ennismore Mews which is already a narrow and difficult road access point where damage is frequently cause already by construction vehicles due to the lack of space.

5.4 Duplicated text - also in 5.3.

6.6 – Reference to Kensington Palace?

Policy KBR31 6.1 – this text remains totally unbalanced. This area is highly residential and it is completely unacceptable to suggest all development should be for the purposes of the Vision only. Please amend to make clear this applies only to new development where the existing use/ownership of the buildings/space is education/science/art.

6.15 Please amend to say “Appropriate management regime and hours of operation must be in place....” No management plan can address all issues if the hours of operation are excessive.

6.20 This paragraph is helpful – but it is at variance with Part 1 which varies the existing framework/agreement.

7.16 Please record the evidence you have received of residents saying they are opposed to measures to reduce traffic in Exhibition Road, and opposed to any suggestion of dedicated space for cycling in the Road. Please also record the fact that the Forum/Plan only covers a minority of Exhibition Road and that such a proposition is not within the control of the Forum.

Simon Birkett

From: Whewell Jane (BRE)
Sent: 13 February 2017 13:13
To:
Cc: 'ONA'; Jan Langmuir; Amanda Frame; 'Michael Bach; Simon Birkett;
Knightsbridge Neighbourhood Forum - Pre-submission (Regulation 14)
Subject: consultation
Commentary on the Knightsbridge Forum Draft Feb 17 final.docx; Part 1 text for
Attachments: Jane W (objectives 1-7) with comments.docx

Dear Chris and Simon

Thank you very much for the opportunity to comment on the draft, which from my perspective is significantly better in many respects – both in terms of areas/issues removed/amended (where they posed problems) and areas included (to seize opportunities for improvements).

You will see there are quite a lot of comments marked on the documents, but this is partly as I have picked up points as I went such as typos and areas where the text may not quite read as saying what I think is intended, in the hope this is helpful. I have also suggested a few additional points you may wish to cover eg. in relation to bus-stop advertising panels. There are also areas of concern where the same point appears in multiple places – so I have made multiple comments but they essentially cover the same thing/point.

The main points of concern that are still an issue remain the same as those we have mentioned at pretty much every stage of previous consultation. These are:

- the intention and wish of the Forum to extend its plan and its recommendations outside its area, both directly and indirectly (eg. where a change in the Forum Area, by its nature, would have a significant impact on those living/operating outside the Forum's area). This is undemocratic given those affected will not have a vote and not in line with neighbourhood planning policy;
- the use of maps to
 - extend the Forum's influence outside the Forum's area; and
 - define a Strategic Cultural Area that appears to be a creation of the Forum rather than a map that reflects any official map (do forgive me if I am wrong, but I can find no such map anywhere on any Government or official website), does not say from what/where/who the map derives (which it should of it risks significant confusion), extends the map beyond the Forum's area and then seeks to apply all KNF policies to this map.
- the unbalanced open-ended favouring of cultural institutions and their unspecified development plans and need for street events, access and staff-housing, thus over-riding the development plans and wider interests of residents and other stakeholders in what is a highly residential area. The plan goes well beyond "fostering an environment" for cultural institutions to outright open-ended favouritism. Residential amenity cannot be 'balanced' against the over-riding needs of others – as a minimum there are absolute levels beyond which residential amenity simply may not be damaged – and the needs and wishes of residents (and their existence around Exhibition Road) needs significantly more acknowledgement in the text for it to be balanced.

Given the ambition of the Forum to influence outside its area I have been forced to comment on issues that I would consider were a matter purely for the residents of Westminster, were the plan only to relate to Westminster and those in the Forum's designated area. A number of my comments would fall away were the Forum to confine its plans to affecting its own area only: we would not wish to dictate to Westminster residents on what happens in their area, in

the same way as we would not want Westminster residents dictating to Kensington residents on what happens in our area.

NB – I should make clear to my colleagues that I have been given privileged access to a word document version of the Forum's draft (my second document) and this text should not be used for any purpose by any other person without the Forum's express permission.

With best wishes

Jane

Jane Whewell

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

FAO Sean Walsh
Neighbourhood Planning
Policy and Strategy
Westminster City Council
6th floor
5 Strand
London WC2N 5HR

By email to neighbourhoodplanning@westminster.gov.uk

14 February 2018

Dear Sean and Andrew

Representations re Knightsbridge Neighbourhood Plan Submission Stage (Regulation 16) consultation

I am writing on behalf of the Knightsbridge Neighbourhood Forum (Forum) to make representations in response to the Regulation 16 consultation on several matters including the New London Plan (NLP).

The Forum submitted the Regulation 15 Knightsbridge Neighbourhood Plan (the Plan) to Westminster City Council (WCC) on 22 November 2017. Shortly thereafter, the NLP was published for consultation on 1 December 2017. This was after the Forum had submitted the Plan to WCC under Regulation 15 but before WCC commenced the Regulation 16 consultation; the consultation was launched on 20 December 2017. This is the Forum's third submission to this consultation.

New London Plan

The Basic Conditions Statement accompanying the Plan does not make any reference to the NLP or its contents as it was not in existence and was not in force at the time of drafting.

The Forum notes that a neighbourhood plan is only required to be in general conformity with the strategic policies of the development plan in force. Nevertheless, the Forum appreciates that the Secretary of State's guidance¹ states that an emerging development plan should be considered because: (i) the evidence base behind an emerging local plan is likely to be relevant to the consideration of the basic conditions; and (ii) to minimise conflicts between policies in neighbourhood plan and the emerging development plan².

¹ Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20160211

² This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires a decision maker to resolve any conflict between the policies in a development plan in favour of the policy contained in the last document to become part of the development plan.

The Forum has therefore undertaken a preliminary review of the NLP to assess the extent to which the Plan appears to be in general conformity with the NLP. The Forum hopes that this will assist the Plan Examiner in considering the Plan against the basic conditions.

In summary, the Forum's preliminary review of the NLP has found that our Plan does appear to be in general conformity with these emerging strategic policies and priorities and provides a positive supporting policy framework on these matters that reflects the local context in Knightsbridge.

The Forum is pleased to see the NLP's objectives, approach and policies on night time uses, 'Healthy Streets' (NLP Policy T2), climate change mitigation and adaptation (e.g. NLP Policies SI2, SI3, SI4 and SI12) and Improving air quality (NLP Policy SI1). The Forum also asks the Plan Examiner to note that there are a number of policy areas in the NLP that are well aligned with the objectives of the Plan. In particular:

- The NLP retains and strengthens the role of the Central Activities Zone (CAZ), which covers the whole of the Knightsbridge Neighbourhood Area and also retains the International Shopping Centre in Knightsbridge.
- The NLP provides clear guidance that Development Plans must ensure tall buildings are sustainably developed and only in appropriate locations.
- In respect of healthy air, the NLP expects larger development to aim to be 'Air Quality Positive' and all other development to be at least 'Air Quality Neutral' (i.e. not lead to a deterioration of existing air quality), with particular care expected in Air Quality Focus Areas (AQFA), one of which includes part of the Knightsbridge Neighbourhood Area.

The Forum is also pleased to see that there is considerable alignment between the 10 main objectives in the Plan and the emerging policies of the NLP as shown in the Appendix to this letter. For example:

Objective 1: Enhance the special character of Knightsbridge including its architecture, heritage, townscape and trees while recognising its status internationally as a prime residential neighbourhood and centre for retail, culture and education

NLP Policy D8 ('Tall buildings') states that the locations where tall buildings are appropriate should be determined by Borough Development Plans. In this regard, the Westminster City Plan and the Plan are clear that Knightsbridge is not a location where tall buildings are generally appropriate. The Plan provides additional guidance on the siting of tall buildings in the Knightsbridge Neighbourhood Area.

Objective 2: Improve the public realm and enhance and restore heritage features

NLP policies on 'Green infrastructure and Natural Environment' (Chapter 8) support the Plan's policies relating to urban greening and the requirement to incorporate green roofs and walls as part of larger developments.

Objective 3: Protect and enhance Hyde Park and Kensington Gardens Metropolitan Open Land including the Hyde Park Barracks land

The NLP reinforces the strongest level of protection against harm to the 'Metropolitan Open Land' in NLP Policy G3. In this regard it supports the Plan policies on Metropolitan Open Land and, in particular, its relationship with the Hyde Park Barracks which was identified as a strategic housing site in the Westminster City Plan.

In respect of the policies relating to the Hyde Park Barracks land, the Forum confirmed in its Strategic Environmental Assessment Screening Report updated on 3 October 2017 that it is not allocating any new sites for development.

Objective 4: Promote the sense of community

The Forum notes that the NLP supports the Plan's policies on the night-time economy (NLP Policy HC6) and creates a requirement for 'an integrated approach to planning and licencing'. Equally, the policy approach in the 'Agent of Change' policy (NLP D12) recognises the importance of adequate management of noise from uses such as pubs where they are close to residential areas.

On a related theme, the NLP 'Design' policies (Chapter 3) concerning the public realm and noise recognise the need to achieve balance notwithstanding the growing competition for access to public space by a range of activities. This aligns with the principles underpinning the Neighbourhood Stress Area policy in the Plan, such as tables and chairs on pavements, deliveries and noise.

The NLP addresses construction (e.g. NLP D2, D9, D13, SI1). The Forum has defined 'Scales of development', simplifying WCC banding, to ensure clarity and that requirements for 'Construction activity' and other policies in the Plan can be applied sensibly and not in all cases to 'all development'.

Objective 5: Protect and enhance existing residential amenity and mix

The Forum notes that the NLP seeks to ensure the best use of existing housing stock, with NLP Policy H11 supporting mechanisms to ensure stock is occupied and that properties are not left empty as 'buy-to-leave' properties. In this regard, the Plan's objective of enhancing existing residential amenity and mix is focused on addressing the growing trend of a falling resident population in Knightsbridge despite the increase in residential stock.

Objective 6: Foster an environment that enables our world-class cultural and educational institutions to thrive as centres of learning and innovation within a flourishing community

The NLP's 'Heritage and Culture' concept (Chapter 7) of identifying South Kensington as an 'arts, culture and entertainment cluster' is consistent with the Plan's focus on the Strategic Cultural Area within the neighbourhood area which has taken account of representations from outside it. It is also supportive of the Plan's policies, particularly relating to the positive approach to the use of the public realm for events.

Objective 7: Enable active travel and personal mobility and

Objective 8: Encourage superb public transport

The 'Transport' policies in the NLP (Chapter 10) align very well with those in the Plan, both recognising the importance of improving the balance of space given to people to walk, cycle and use public transport. The use of the concept of 'Healthy Streets' (NLP Policy T2) in the NLP aligns with the Plan's approach to 'active travel'. In addition, parking and motor vehicle policies in the NLP, as well as its policies relating to energy infrastructure, are supportive of the Plan's policies seeking to minimise car use generally and maximise the provision for electric vehicle infrastructure. Indeed, the NLP goes further than the Plan, insisting on zero provision of parking rather than simply encouraging it.

Objective 9: Encourage superb utilities and communications infrastructure

The Forum notes that the 'Sustainable Infrastructure' policies in the NLP (Chapter 9) are supportive of the relevant Plan policies relating to water infrastructure, flood risk, sustainable drainage and digital connectivity.

Objective 10: Be an exemplar in sustainable city living by complying fully with international laws, standards, guidelines and best practice

The NLP reflects the London Mayor's commitment to London becoming a zero-carbon city and its policies reflect this aim. In this respect, the Forum notes that the 'Sustainable Infrastructure' (Chapter 9) and the 'Green Infrastructure and Natural Environment' (Chapter 8) policies in the NLP are supportive of the relevant Plan policies, particularly those relating to air quality, minimising greenhouse gas emissions, trees and biodiversity. With particular regard to air quality, the Forum recognises that the NLP has followed, as the Plan has tried to do, the legal duties under the Air Quality Directive. The Forum is of the opinion that, in respect of its energy policies, the NLP should go further to address the retrofitting of buildings with energy efficiency and decarbonisation measures and uncertainty about national action to decarbonise energy grids.

The Forum welcomes the recognition by the NLP that early engagement with local people leads to better planning proposals, with specific recognition of the value of Neighbourhood Plans (paragraph 1.1.5 on page 12 of the NLP). This aligns well with the Plan's policy approach to involving people.

Community Infrastructure Levy

The Forum welcomes the NLP's recognition that Community Infrastructure Levy (CIL) funding should be used to address a wide range of infrastructure needs (NLP Policy T9).

Other - NLP

The Examiner should be aware that, at the current time, the Forum has not prepared or submitted representations to the NLP consultation which closes on 2 March 2018. However, it would be pleased to forward these representations to the Examiner when they are lodged.

Other matters

In order to assist the Examiner, the Forum is also submitting to the Regulation 16 consultation a letter containing a schedule of minor erratum items that the Forum has identified in the documents it submitted at Regulation 15 stage. A second letter submits three examples of responses to the Forum's Regulation 14 consultation on particular aspects of the Plan and a letter omitted by Historic England.

Given the importance attached to heritage in the Plan, it may be of relevance to the Examiner to note that on 22 December 2017, Historic England published updated 'Good Practice Advice' on planning matters relating to the setting of heritage assets³.

Of relevance to the Plan policy relating to office uses, the Examiner should also be made aware that on 1 February 2018, WCC took the decision (subject to call-in) to issue an Article 4 direction to remove permitted development rights for change of use from office (class B1(a)) to residential (class C3) in the Central Activities Zone. The Direction will come into effect on 1 May 2019.

Please contact me if you have any questions.

Yours sincerely

Simon Birkett
Chair

³ Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

APPENDIX

Preliminary assessment of general conformity with New London Plan policies (as at 14.2.18)

Knightsbridge Neighbourhood Plan policies	New London Plan policies
KBR1	D1 London's form and characteristics and D2 Delivering good design
KBR2	D7 Public realm
KBR3	D7 Public realm
KBR4	D7 Public realm and HC1 Heritage conservation and growth
KBR5	D7 Public realm and HC3 Strategic and Local Views
KBR6	D7 Public realm and HC1 Heritage conservation and growth
KBR7	D8 Tall buildings and HC1 Heritage conservation and growth
KBR8	D7 Public realm and T2 Healthy Streets
KBR9	D7 Public realm
KBR10	D1 London's form and characteristics and G5 Urban greening
KBR11	D1 London's form and characteristics, G1 Green infrastructure, G5 Urban greening and SI4 Managing heat risk
KBR12	G4 Local green and open space
KBR13	G2 London's Green Belt and G3 Metropolitan Open Land
KBR14	D1 London's form and characteristics, D7 Public realm and T2 Healthy Streets
KBR15	D7 Public realm, D12 Agent of Change, E9 Retail, markets and hot food takeaways and HC6 Supporting the night-time economy
KBR16	D12 Agent of Change and HC6 Supporting the night-time economy
KBR17	D10 Safety, security and resilience to emergency
KBR18	SD4 The Central Activities Zone (CAZ)
KBR19	HC7 Protecting public houses
KBR20	S1 Developing London's social infrastructure, S4 Play and informal recreation and S5 Sports and recreation facilities
KBR21	E1 Offices, E2 Low-cost business space and E3 Affordable workspace
KBR22	SI7 Reducing waste and supporting the circular economy
KBR23	D2 Delivering good design, D9 Basement development, D13 Noise and SI1 Improving air quality
KBR24	H12 Housing size mix and H17 Purpose-built student accommodation
KBR25	H11 Ensuring the best use of stock
KBR26	E10 Visitor infrastructure and HC5 Supporting London's culture and creative industries
KBR27	D7 Public realm and HC5 Supporting London's culture and creative industries
KBR28	D7 Public realm, T2 Healthy Streets and T5 Cycling
KBR29	T2 Healthy Streets
KBR30	T4 Assessing and mitigating transport impacts
KBR31	T6 Car parking, T6.1 Residential parking and T7 Freight and servicing
KBR32	T9 Funding transport infrastructure through planning
KBR33	T3 Transport capacity, connectivity and safeguarding
KBR34	SI5 Water infrastructure and SI6 Digital connectivity infrastructure
KBR35	SI1 Improving air quality and SI2 Minimising greenhouse gas emissions
KBR36	SI3 Energy infrastructure
KBR37	SI1 Improving air quality and SI2 Minimising greenhouse gas emissions
KBR38	G6 Biodiversity and access to nature
KBR39	G7 Trees and woodlands
KBR40	SI5 Water infrastructure, SI12 Flood risk management and SI13 Sustainable drainage
KBR41	D13 Noise
KBR42	GG1 Building strong and inclusive communities

From: Jane Ellis
Sent: 13 February 2018 08:52
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

To whom it may concern

I am writing on behalf of the Board of Trustees of the Science Museum to make representation on the proposed Knightsbridge Neighbourhood Plan ("the Plan").

The Science Museum sits outside the boundary of Westminster and is therefore not covered by the Plan. However, the Museum appreciates the efforts made by the Neighbourhood Forum over the past three years to consult widely with all stakeholders, including those organisations, residents and people working in adjacent areas.

The Museum welcomes the acknowledgement set out in the Plan that the Strategic Cultural Area ("SCA") has a unique and coherent character, notwithstanding the fact that it straddles the boundary between Westminster and RBKC. Whilst being clear that the Plan's policies only apply to that part of the SCA that lies within Westminster, we note that the policies to sustain and nurture thriving cultural and educational organisations in the northern part of the Strategic Cultural Area are in line with RBKC policies for the southern part of that area. In that respect the Museum is supportive of Objective 6.0, to foster an environment that enables cultural and educational institutions to thrive within a flourishing community.

The Museum supports the holistic nature of the Plan, understanding that whilst policies KBR26 and KBR27 focus on cultural development, any such development would naturally also be subject to the comprehensive policies elsewhere in the plan, which focus on enhancing residential amenity and the importance of Knightsbridge as a prime residential area.

Yours faithfully

JANE ELLIS
DIRECTOR OF CORPORATE SERVICES

**SCIENCE
MUSEUM
GROUP**

The Science Museum Group: [Science Museum, London](#);
[National Science and Media Museum, Bradford](#); [Museum of Science and Industry, Manchester](#); [National Railway Museum, York](#); [Locomotion, Shildon](#)

From: Caroline Burke
Sent: 13 February 2018 10:50
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

I have lived in Knightsbridge for over 30 years and I am writing to confirm my support for the proposed Knightsbridge Neighbourhood Plan.

I am particularly concerned with the barracks KBR 14 and it's importance to the area's character. I would not support any increase in footprint or height of the buildings. In general I agree that all developments' design and materials should be in line with the other buildings in the Conservation area.

There are some excellent proposals in regard to the Stress Area (KBR 15) and I also support the Neighbourhood Management Plan in Part Two.

I do not think there is anything in the Plan which I would not support.

Caroline Burke

From: Fedra Sanchez
Sent: 13 February 2018 12:47
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

I have been working in the Knightsbridge area for the last 13 years and I would like to express my full support to the Knightsbridge Neighbourhood Forum Plan and the proposed Neighbourhood Management plan in part two.

My main areas of concern are air pollution which over the years has changed dramatically and it must be addressed and the future of the Hyde Park Barras which is a landmark to the area and those living around it.

Saying that I will also like to mention that I also believe that every single policy proposed in the plan will protect and benefit the Knightsbridge area in all aspects, now and for the foreseeable future.

Best wishes
Fedra

Fedra Sanchez
Resident Relations Manager
Knightsbridge Residents Management Company Limited

W: www.theknightsbridge.com

Westminster City Council Response to Knightsbridge Neighbourhood Plan

Introduction:

1. The Council recognises the huge amount of work that has gone into the preparation of the Knightsbridge Neighbourhood Plan. Dialogue with the Neighbourhood Forum and their representatives as the plan has evolved has been productive, and the Council is pleased to see that some of our earlier comments have been addressed through the submission version. However, several concerns remain outstanding.
2. For a neighbourhood plan to be made, it must satisfy the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. To satisfy these basic conditions, the plan must:
 - be appropriate having regard to national policy;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies in the development plan for the local area;
 - be compatible with human rights requirements; and
 - be compatible with EU obligations.
3. The Council considers the document titled 'Knightsbridge Neighbourhood Plan 2017-20137 Part 1: Knightsbridge Neighbourhood Plan' to be the submission plan that is subject to examination, and our comments therefore focus on this. Documents titled 'Knightsbridge Neighbourhood Plan 2017-2037 Part 2: Neighbourhood Management Plan' and 'Knightsbridge Neighbourhood Plan 2017-2037 Part 3: Knightsbridge Evidence Base' do not contain planning policies, include extensive measures that cannot be controlled through the planning process, and cannot therefore form part of the development plan. They instead only form part of the evidence base to support the plan. In this respect, it is noted that paragraph 0.4 of the document titled 'Knightsbridge Neighbourhood Plan 2017-20137 Part 1: Knightsbridge Neighbourhood Plan' states that Part 2 *"is not a formal part of the development plan but reflects wider community aspirations than those relating to development and the use of land"* and that Part 3 *"provides more detail on how the policy has been developed" and "sets out some useful background information about Knightsbridge and how the Plan has been developed."*
4. Detailed comments on the Knightsbridge Neighbourhood Plan 2017-20137 Part 1: Knightsbridge Neighbourhood Plan are provided by policy/ section in the attached schedule. As a result of the issues raised in this schedule, the Council is of the opinion that the plan as submitted does not meet the basic conditions that neighbourhood plans should satisfy. Various aspects of the plan do not have proper regard for national policy, contribute to the achievement of sustainable development, or achieve general conformity with the strategic policies in the development plan. In our response we have sought to suggest changes that could be made to the Plan that we consider would help bring it within the basic conditions.

Regard to national policy:

5. Further references to national policy are included in the attached schedule, but in general terms, key elements of the NPPF that are of relevance include:
 - Paragraph 16, that through neighbourhood planning, neighbourhoods should *“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development”* and *“plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan”*
 - Paragraph 19 that *“planning should operate to encourage and not act as an impediment to sustainable growth”*
 - Paragraph 173 that *“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”*
 - Paragraph 183 that neighbourhood planning should be used to *“set planning policies through neighbourhood plans to determine decisions on planning applications”*
 - Paragraph 184 that *“neighbourhood plans and orders should not promote less development than that set out in Local Plans or undermine its strategic policies”*.
6. As drafted, the plan does not support the strategic development needs of the City set out in the Local Plan (Westminster City Plan and saved UDP policies), or positively support local development. Instead it promotes less growth than the current development plan, and taken as a whole would be likely to impede sustainable growth. It is likely to have this effect by seeking to impose onerous requirements on development proposals that have not been tested for their viability impact, and by seeking to impose procedural requirements that are a matter for the local planning authority to determine in accordance with national legislation and guidance. This includes matters that are not only beyond the scope of neighbourhood plans (and, indeed, land use planning), but also have significant resource implications on the City Council as the local planning authority (e.g. the proposed Knightsbridge Code of Construction Practice and Knightsbridge Community Engagement Protocol).
7. The plan includes policy criteria that do not relate to the development and use of land and therefore cannot be controlled through the determination of planning applications, and duplicates matters that already benefit from substantial policy coverage. It undermines strategic elements of the Westminster City Plan by promoting less development of a site that has been identified as a strategic housing site (Hyde Park Barracks), and introducing a new road hierarchy that is not consistent with the City Council’s approach.

Achievement of sustainable development:

8. For the reasons set out in paragraphs 5-7 above, the plan is not considered to contribute to the achievement of sustainable development. As set out in paragraph 7 of the NPPF, sustainable development includes an economic development dimension. However, the plan does little to ensure that *“sufficient land of the right type is available in the right places and at the right time to support growth and innovation”* (NPPF paragraph 7). Instead it seeks to restrict development opportunities, through matters such as being very prescriptive on the use of materials, resisting any alterations to existing tall buildings, introducing additional development constraints such as a new views and new stress areas and limiting redevelopment opportunities to the footprint and height of existing buildings (Hyde Park Barracks). The plan’s strong emphasis on the environmental and social aspects of sustainable development means that it does not meet the requirements of NPPF paragraph 8, that *“to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously”*. In parts, the use of wording in policy criteria is also ambiguous, meaning it will be difficult to meaningfully apply to development proposals; undermining any scope that does exist for sustainable development. Where this is the case, it has been noted in the attached schedule.

Conformity with strategic policies:

9. Areas where the plan lacks general conformity with the strategic policies in the development plan are referred to in paragraph 6 above.

Schedule of detailed comments:

Policy/ Section	Comment
Introduction	Paragraph 0.3 does not clearly set out what the role of the development plan is in determining planning applications, that if adopted the neighbourhood plan would form part of the development plan (alongside the City Plan and London Plan). Clarity on this issue is fundamental for the scope and content of the document.
KBR1: Character, design and materials	It is unclear from policy wording in paragraph b if the intention is to restrict building materials in the identified character areas to prescribed materials, or describe the existing character in these areas that proposals should respond to. Any intention to restrict materials to those quoted overstates the degree of homogeneity that exists in these areas, and is contrary to design guidance in NPPF paragraphs 56-65. Policy and supporting text should

	<p>therefore clarify that identified areas are ‘characterised’ by some common materials, but that not only these materials would be acceptable. Policy should also make clear that character areas are identified on the policies map.</p>
KBR2: Commercial frontages, signage and lighting	<p>Policy largely duplicates the requirements of the Council’s existing shopfronts, blinds and signs SPG design guidance and therefore unnecessary. What is locally specific is overly prescriptive e.g. requirement for ‘subtle white lighting’. It is also unclear if criterion d is referring to shop lighting or architectural lighting, whilst criterion f may have unintended consequences in effectively supporting security measures such as CCTV that is not sensitively incorporated.</p>
KBR3: Boundary railings and walls	<p>Policy largely duplicates the requirements of saved UDP policy DES7, is not locally specific, and therefore unnecessary. Furthermore, it is not clear if ‘heritage lights’ means ‘heritage street lights’ as defined in the glossary. Supporting text should also make clear that the placement and maintenance of street furniture is usually outside the control of planning.</p>
KBR4: Public realm and heritage features	<p>Whilst the policy intention is understood, there may be limited circumstances where it applies as many proposals will be permitted development. To clarify the aspirational nature of the policy, it may be useful to replace ‘where applicable’ with ‘where possible’.</p> <p>While the council supports removal of kiosks and utility cabinets that are no longer required, there are limits to the extent that new development can deliver this – which is likely to involve considerable costs for developers.</p> <p>Criterion a appears to duplicate policy KBR3.</p> <p>Reference in paragraph 1.12 to York Stone, when read alongside requirements in criteria d has cost implications that have not been viability tested. In practice this would only be appropriate where York Stone was there in the first place – as highway authority the City Council would not support its use outside the areas identified in its “Westminster Way” supplementary planning guidance because of its substantial cost. We would suggest omission of this reference.</p>
KBR5: View north along Montpelier Street	<p>Neither the foreground or background of the suggested view is considered worthy of protection in this way, and a lack of justification has been provided of the criteria used to designate the view, and how this confirms with guidance on local views given</p>

	<p>in UDP policy DES15. This states that <i>“Local views... can be of natural features, skylines, landmark buildings and structures, groups of buildings, parks, open spaces, streets and squares. They are of local significance, making a valuable contribution to the character of the local area.”</i></p> <p>Numerous examples exist across London of streets of attractive residential and commercial properties, which already benefit from protection through design and heritage policies. Furthermore, no mention is made of the Peninsular Tower of Hyde Park Barracks, that is the focus of the view (despite its acknowledgement in Part 3: Knightsbridge Evidence Base).</p> <p>This lack of clarity about the particular features of the view that are considered to merit this degree of special protection means that this policy is unlikely to be effective in taking planning decisions.</p> <p>Paragraph 44 of the NPPG on neighbourhood planning states their role: <i>“should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies... Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan.”</i> As Knightsbridge Barracks is allocated as a strategic site for development in the adopted City Plan, the proposed designation could negatively impact on this designation, contrary to the purpose of neighbourhood plans.</p> <p>We would suggest deletion of this policy.</p>
KBR6: Local buildings and structures of merit	<p>The identification of buildings and structures on the policy map (or inset maps) within the plan would enhance its usability, particularly given earlier comments that part 3 will not form part of the development plan.</p> <p>Reference to DES9(C) appears inaccurate and should be DES9(B).</p>
KBR7: Tall buildings	<p>It is unclear what type of alterations criterion B is seeking to restrict. Any attempt to refuse any alterations to existing buildings taller than their surroundings is highly prescriptive and contrary to NPPF requirements to promote sustainable development. Furthermore, criteria B(e) duplicates criteria B(d).</p> <p>Criterion C repeats requirements already established through London Plan Policy 7.7 and is unnecessary.</p>

<p>KBR8: Pedestrian movement along, across and adjacent to main roads</p>	<p>It needs to be recognised that the roads in the neighbourhood form part of a borough- (and London-) wide network and piecemeal local changes can have major implications elsewhere. This is an area where the need to focus on land use matters and to conform to strategic policies is particularly important. Criterion A’s support for more pedestrian space at the expense of vehicular traffic needs to be considered in the context of analysis of road delays which shows that it is the restriction of capacity which is a substantial factor in generating congestion.</p> <p>Criterion B appears to relate to proposals not under the Council’s control – since any reduction of carriageway from the strategic road network would be a matter for TfL to determine. Furthermore, as worded it is overly restrictive since any reduction in carriageway is likely to result in some increase in traffic congestion. If the intention is that additional public footway space is gained through increased building setbacks (which is likely to result in increased building heights), this should be made clear.</p> <p>The classification of main roads in criterion C conflicts with the Council’s identified road network hierarchy as set out in UDP Policy TRANS16 – it includes roads that are not part of the Transport for London Road Network, London Distributor Roads, or Local Distributor Roads. No justification for this local designation departing from this strategic designation has been provided; nor is it explained how a neighbourhood-based hierarchy could have practical effect when it covers an extremely small area of the City’s overall highways network. This approach could undermine the Council’s role as highways and traffic authority and is an area in which the Plan is clearly not consistent with strategic policies in the local plan.</p> <p>Furthermore, paragraph 2.4 inaccurately refers to several roads that are not part of the TLRN – of those mentioned only Brompton Road and the part of Knightsbridge between Brompton Road and Hyde Park Corner are. Kensington Road and Kensington Gore are Westminster City Council roads and any liaison needs to be with the council as highway authority.</p> <p>We would suggest deletion of this policy.</p>
<p>KBR9: Advertising</p>	<p>Policy duplicates saved UDP Policy DES8 and is unnecessary. In terms of terminology, if retained it should refer to advertisement consent rather than planning permission.</p> <p>Paragraph 2.6 should make clear that any proportionate advertising on construction sites should only be in commercial</p>

	<p>streets at ground floor level, to confirm with the Councils approach as set out in UDP policy DES8 and paragraph 10.99.</p> <p>Paragraph 2.7 does not provide justification to the policy and instead implies that the Council should introduce Article 4 Directions – setting such direction falls beyond the scope of neighbourhood plans.</p>
KBR10: Roofscapes and balconies	<p>Criterion C appears to have omitted consideration of any potential harm to heritage assets. It is also unclear how noise impacts of balcony proposals will be assessed under Criterion C(c), which makes the policy requirement difficult to implement.</p>
KBR11: Urban greening	<p>Criterion C is highly onerous. Under C(b), it is unclear how a plan demonstrating resistance to disease, pest and climate change could be provided.</p>
KBR12: Protection and maintenance of local green spaces	<p>Criterion B is negatively phrased. Its wording implies a “rubber stamp” approach to the taking of planning decisions that would be challengeable if implemented.</p>
KBR13: Metropolitan Open Land	<p>No comment</p>
KBR14: The Hyde Park Barracks land	<p>Reversion of the whole site to parkland (itself an ambiguous term – is something other than green open space intended?) as supported in Criterion B promotes less development than adopted City Plan Policy, which identifies the site as a strategic housing site, and is therefore contrary to NPPF paragraph 184. A better approach might be to state that any redevelopment of the site should include generous green open space provision functionally related to Hyde Park on the other side of South Carriage Drive.</p> <p>The final sentence of criterion D(a) appears to restrict design solutions to the site that could result in a more equitable distribution of building heights and massing. It is therefore contrary to the NPPF paragraphs 56-65 on requiring good design.</p> <p>Criterion F is unnecessary. As the site is bordered by Knightsbridge and South Carriage Drive, all vehicular access will be via these routes.</p> <p>Criterion G cannot be enforced through the planning system – development proposals can only provide suitable drop/ off collection points on site, not control driver behaviour which is a matter for the Council as highway and traffic authority.</p>

	<p>It is not the role of a neighbourhood plan to dictate where the City Council should prepare planning briefs as set out in paragraph 3.16. This is a judgement for the Council as local planning authority, having regard to the guidance in paragraph 153 of the National Planning Policy Framework.</p> <p>The planning system does not protect rights to ‘tranquillity’ as referred to in paragraphs 3.17-3.22. Furthermore, the site is in a central London location, is already partially used for residential purposes, is located next to residential uses, and has already been identified in the City Plan as a strategic housing site.</p> <p>Under paragraph 3.25, no evidence has been provided for a Knightsbridge specific need for housing for older people.</p> <p>Paragraph 3.28 refers to the LUC report and views identified within it – though the document has no status as a policy document. If additional views are proposed to that set out in policy KBR5, they should be included within policy and appropriately justified.</p>
<p>KBR15: Neighbourhood Stress Area</p>	<p>The policy as presented relates to mitigation of the effects of all uses other than residential ones. Given that the Stress Areas in the Westminster City Plan operate rather differently we would suggest that it would avoid confusion if a term other than “Neighbourhood Stress Area” were to be used.</p> <p>Criterion C relates to licensing rather than planning considerations and is therefore not appropriate for a neighbourhood plan.</p> <p>Criterion D should clarify that ‘Local Roads’ are identified on the proposals map to enable the policy to be implemented. Alternatively, omission of the term might be considered, as it does not appear to add greatly to the effectiveness of the policy.</p>
<p>KBR16: Night-time and early morning uses in or adjacent to residential areas</p>	<p>Paragraphs B and C of this policy would be likely to be more effective if it identified places where night-time uses were acceptable and set out additional criteria for proposals elsewhere. Otherwise, criterion C should clarify that ‘Local Roads’ are identified on the proposals map to enable the policy to be implemented.</p> <p>Furthermore, many ‘renewal’ proposals may not need planning permission, and as worded the policy does not allow for any assessment of the degree of harm of individual proposals.</p>

KBR17: Security and resilience measures	<p>Under criterion A, it is unclear how 'state of the art' can effectively be determined. As such it does not provide helpful guidance for either developers or the local planning authority.</p> <p>Criterion B relates to procedural matters rather than criteria for determining a planning application and should not therefore form part of policy. Furthermore, there may be circumstances where Secured by Design principles may not be appropriate due to other competing factors, yet proposed wording does not recognise this. We would in any event suggest omission of references to particular standards, which may become dated quite quickly.</p>
KBR18: Retail uses in the International Shopping Centre	<p>It is unclear how it will be judged if proposals 'will enhance the ISC's international reputation' as required under criterion A. Furthermore, paragraph 4.13 hints that this relates to the quality of the occupier, which is not a planning consideration (the planning system can only deal with uses of land of course).</p> <p>Criterion A conflicts with Policy KBR18A.</p>
KBR19: Protection of public houses	No comment.
KBR20: Community uses	No comment.
KBR21: Office uses	<p>To ensure effective implementation, policy would benefit from some supporting text that sets out how the existing viability of office use (as referred to in criteria B), would be judged.</p> <p>Criterion D misstates the purpose of directions under article 4 of the General Permitted Development Order. It would be better if this paragraph simply expressed support for the making of a direction by the City Council along the lines of the first sentence in paragraph 4.22.</p>
KBR22: Household and commercial waste consolidation	Criterion C appears to relate to matters such as businesses management practices, such as their on-site freezer space, or amount of stock that is ordered, which are not planning considerations.
KBR23: Construction activity	Criterion B makes onerous requirements on small developments that may result in limited construction movements; e.g. proposals for a single dwelling, basement or refurbishment of existing buildings. Requiring such proposals to provide a construction management plan or make planning obligations could undermine the viability of small scale development contrary to national policy

	<p>requirements that policies should not be so burdensome that they do so.</p> <p>Criteria C appears to require onerous processes on developers and the Council, through signposting to Appendices C and F. The contents of these go beyond the remit of a neighbourhood plan and have resource implications for the City Council. Construction issues are not unique to Knightsbridge and the City Council already has established policies and procedures to deal with Codes of Construction Practice and its enforcement. Many of the matters dealt with are controlled through other enforcement regimes and there are limits to the extent to which the planning system can deal with such matters. In any event, by confusing responsibilities and enforcement procedures this policy may make addressing the underlying issues less rather than more effective. The City Council is clear that it does not have the resources to enforce the standards suggested in this policy, which may therefore be undeliverable.</p> <p>If the Neighbourhood Forum wishes to promote particular standards by providing best practice for contractors, it should do so in a separate document.</p>
KBR24: Residential mix including to support local workers and students	<p>Criterion A duplicates (and potentially weakens) City Plan Policy S15 and is unnecessary. Community feedback of perceived need, as referred to in paragraph 5.2, should not override the robust evidence based approach to assessing need through the SHMA.</p> <p>It is not possible to restrict occupation of private market housing by place of work as suggested in criteria B. Paragraphs 5.2-5.4 meanwhile, indicate the policy is intended to relate to affordable housing. As the NPPF makes clear, eligibility for affordable housing has to be set by the City Council on the basis of local incomes and local house prices, and its allocation is managed in line with housing legislation. It is therefore not possible to confine the delivery of affordable housing to employees (or indeed that affordable housing provided in one part of a borough will be occupied by those living or working in that area).</p>
KBR25: Reconfiguration of existing residential buildings	<p>Paragraph 5.6 should make clear that lateral conversions can cause harm to the special interest of listed buildings, and would therefore not normally be acceptable (as set out in the supporting text to UDP policy DES10).</p>
KBR26: Existing and new development	<p>No comment.</p>

within the Strategic Cultural Area	
KBR27: Public realm in the Strategic Cultural Area	<p>Criterion A relates to neighbourhood management issues rather than the consideration of planning applications and is therefore beyond the scope of a neighbourhood plan. Furthermore, the nature of temporary and pop up events, as referred to in criteria B, cannot be controlled through the planning process.</p>
KBR28: Enabling active travel	<p>Criterion D is negatively phrased, and overly onerous as it fails to recognise that some proposals may have overriding benefits, or that different modes of active travel may sometimes compete – e.g. cycle parking vs space for pedestrians. Local facilities that support active travel are also not defined so the policy cannot be effectively implemented.</p> <p>This paragraph is repetitive of the other parts of the policy. Given this and the other points we have made, we would suggest its omission.</p>
KBR29: Pedestrians within the movement hierarchy	<p>Criteria A – C duplicate existing London Plan, City Plan, and UDP policy.</p> <p>Criterion E raises matters of ownership and management that are beyond the scope of a neighbourhood plan.</p> <p>Under criterion G, pedestrian traffic signals are a highway management rather than land use planning matter.</p> <p>Criteria H refers to highways management rather than land use planning matters.</p> <p>We would suggest omission of E-H. A-C could be integrated with policy KBR 28 to provide a single, comprehensive policy dealing with active travel.</p>
KBR30: Assessing significant transport impacts of development proposals	<p>Policy relates to the procedure and contents of transport assessments rather than criteria for the determination of a planning application. It is for the local planning authority to set out what material should be submitted with a planning application, in accordance with relevant legislation. It therefore goes beyond the scope of a neighbourhood plan, as set out in paragraph 183 of the NPPF to set planning policies to determine planning applications.</p> <p>We would suggest omission of this policy.</p>
KBR31: Motor vehicle use	<p>Criteria A is contrary to UDP policies TRANS22 and TRANS23 and could result in additional on-street parking stress. The term</p>

	<p>'motor-vehicle free' should be defined as currently it is not clear if this refers to car parking, or also servicing requirements.</p> <p>Criterion B should not relate to 'all development' – doing so is overly onerous for minor extensions and change of use applications. It also raises issues relating to the operation of buildings after construction, where the planning system will have very limited efficacy.</p>
<p>KBR32: Electric vehicle infrastructure</p>	<p>Current policy wording appears to exclude vehicles running on other sustainable fuels (e.g. hydrogen) that could realise similar environmental benefits. We would suggest that a more generally-worded policy supporting sustainable vehicle options would be better than one along these lines which could become outdated very quickly as a result of technological change.</p> <p>Criterion B should seek to ensure that where charging points are promoted, design and siting is considered against pedestrians and other highways users to conform with NPPF and development plan requirements to support an increased uptake in walking and cycling.</p> <p>Reference in paragraph 7.17 to use of parking spaces by private hire vehicles is not a matter for planning applications, and does not relate to policy KB32.</p> <p>As worded criterion E could have negative impacts on character and heritage through unsightly provision across the neighbourhood area.</p>
<p>KBR33: Public transport</p>	<p>The capacity and efficiency of mass transit systems is a matters of public transport service planning and therefore beyond the scope of a neighbourhood plan.</p>
<p>KBR34: Utilities and communications infrastructure</p>	<p>The policy could usefully encourage developers to integrate utility requirements into the design of the schemes from the outset – something the City Plan is also likely to do. Experience shows that where this is not done utilities are often retrofitted requiring street works and road closures.</p> <p>Supporting text could usefully explain that whilst planning for future demand of utility services is an ongoing issue in Westminster and throughout central London, it falls outside the Council's jurisdiction.</p>

KBR35: Healthy air

It is not appropriate for the neighbourhood plan to seek to apply air quality standards that are considerably more onerous than approved national ones. This is a very significant step and to bring it forward there should be a proportionate evidence base showing the approach is likely to be deliverable and effective. By its nature, this is an issue that a neighbourhood cannot deal with on its own. This is an area where the City Council and the Mayor are both bringing forward new policy approaches; as these deal with London and Westminster as a whole they are likely to be more effective. We would suggest this policy is consolidated and simplified and that the neighbourhood forum is encouraged to revisit the matter in the light of new local and regional policies.

Criterion C seeks to impose additional procedural requirements on developers than the Councils own validation requirements, which goes beyond the remit of a neighbourhood plan. No evidence has been provided of the impact these additional requirements may have on the viability of small scale developments.

Interpretation of sustainable development in criterion D is contrary to the definition given in paragraphs 7-8 of the NPPF that it is not just about environmental, but also social and economic goals. It also appears to go further than the explanation given in paragraph 10.8 of the plan that worsening of air quality may be justified in exceptional circumstances where they can be justified by the principle of sustainable development. There is no evidence that this standard can be practically met by new development (particularly given the age and nature of the building stock in the neighbourhood and relevant heritage designations). Given this we would suggest its omission.

Criteria E and F go beyond London Plan Policy 7.14B(d) requirements that development proposals be at least 'air quality neutral', and City Plan Policy S31 requirements that developments minimise air pollution. No evidence has been provided that the viability implications of the proposed more stringent requirements have been tested, whilst in some cases refurbishment may not require planning permission. Furthermore, within point E, there appears to be some contradiction between sub-criterion a and c. Criterion a states that development must be air quality positive, yet sub-criterion c states developments must try not to cause or contribute to worsening air quality. For the reasons given above we would suggest sub-criterion c takes the appropriate approach.

	<p>Criterion G – air intake points have not been defined, making the policy requirements unclear.</p> <p>Criterion H introduces a disproportionate demand for evidence (i.e. air quality assessments) for minor proposals for outdoor seating that respond to peoples preference sit outside.</p>
KBR36: Renewable energy	<p>No evidence has been provided that these policy requirements do not undermine development viability, as required by NPPF paragraph 173.</p> <p>Criterion C relates to matters about the operation of buildings after construction. They cannot be enforced through the planning process. We would suggest its omission.</p> <p>The restriction of use of generators as set out in criteria E cannot be enforced through the planning process. A better approach might be to set a hierarchy for emergency generators which gives preference to non- or less-polluting options.</p> <p>Criterion F goes beyond the remit of a neighbourhood plan in seeking to impose how nationally prescribed standards are interpreted.</p>
KBR37: Retrofitting historic buildings for energy efficiency	<p>Whilst criteria A sets out that retrofitting of energy efficiency measures should be sensitive, the inclusion of support for double glazing given in criteria B will normally be inappropriate on listed buildings due to its conflict with statutory requirements to preserve their character. It should therefore be removed.</p> <p>There is no reason to confine this policy to major development, and as we suggest omitting the different levels of development set out in Appendix G, we would suggest omission of the final sentence of the policy.</p>
KBR38: Natural environment	No comment.
KBR39: Trees	<p>Criterion A, when taken alongside paragraph 10.23, appears to indicate an intention that future tree planting should move away from London Planes in anticipation of a disease that is not yet present in the UK, despite them being iconic species in London garden squares. Such an approach is not supported. Policy should make clear that plant species will need to respect existing character and heritage for consistency with paragraph 58 of the NPPF that planning policies should respond to local character and history.</p>

	<p>Criterion B covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan. It also goes beyond existing legislative requirements, so not enforceable.</p> <p>Criterion C covers matters that may not require planning permission and therefore outside the scope of a neighbourhood plan.</p> <p>Criterion D cross refers to Appendix E, which sets out onerous procedural matters beyond the scope of a neighbourhood plan. In particular, neighbourhood plans cannot dictate procedural requirements on the City Council as set out in E1.2</p> <p>Criterion E covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan.</p> <p>Criterion F relates to matters controlled through the highways authority rather than planning.</p> <p>Paragraph 10.24 fails to recognise that applications can often be supported by tree reports from non-independent tree surgeons or consultants, and appears to remove the City Council's ability to scrutinise such reports.</p> <p>We would suggest this policy should be considerably shortened so it focusses on matters relating to land use and which can be enforced through the planning system. If the neighbourhood wishes to encourage different approaches it might consider doing so in a separate, non-statutory document.</p>
KBR40: Sustainable water	<p>It is unclear from criterion A how 'a minimum' will be determined, which raises issues of the deliverability of the policy.</p> <p>Criterion B covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan.</p>
KBR41: Healthy people	<p>Criterion B covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan.</p> <p>Communal lighting as referred to in criteria C cannot be controlled through the planning process.</p> <p>Criteria D is overly onerous, and no evidence has been provided of its impact on development viability. The planning system cannot insist on consideration of refurbishment options prior to</p>

	<p>redevelopment on all buildings – particularly where the proposal relates to something that is not a heritage asset.</p>
<p>KBR42: Sustainable development and involving people</p>	<p>Criterion A glosses national policy and legislation and is unnecessary.</p> <p>Criterion B refers to process rather than policy for the determination of a planning application. It therefore falls outside the scope of a neighbourhood plan, and is covered by separate legislation.</p> <p>It is not the role of a neighbourhood forum or neighbourhood plan to dictate the consultation process developers and the City Council should follow, as set out in Appendix F and cross referred to in paragraphs 10.32-10.33. These are matters set out in national legislation. Furthermore, paragraph 10.33 relates to schemes the City Council would not be consulting on through planning applications.</p> <p>There are legal tests and requirements governing the use of planning obligations and the Community Infrastructure Levy and the neighbourhood forum does not have the power to modify or add to these. For these reasons we would suggest omission of paragraph 11.3.</p>
<p>Appendices</p>	<p>Appendix A – definition of heritage street lights is unclear and inconsistent with policy KBR3 wording of “heritage lights”.</p> <p>Appendix C seeks to impose onerous processes on developers and the Council, that goes beyond the remit of a neighbourhood plan and has resource implications for the City Council. Construction issues are not unique to Knightsbridge and the City Council already has established policies and procedures to deal with Codes of Construction Practice and its enforcement. Seeking to impose different standards for one neighbourhood will unnecessarily complicate the City Council’s enforcement functions. For these reasons we would suggest its omission. A better approach might be for the neighbourhood to encourage adoption of locally-specific good practice through a separate non-statutory document.</p> <p>Appendix E seeks to impose onerous processes that go beyond the remit of a neighbourhood plan in seeking to require, and then control, the content of Tree Management Plans. There is no formal mechanism by which Tree Management Plans could be adopted by the local planning authority, and any requirements would not override the requirement for applications for tree work to be submitted to the City Council. For these reasons we would suggest</p>

	<p>its omission. A better approach might be for the neighbourhood to encourage adoption of locally-specific good practice through a separate non-statutory document.</p> <p>Appendix F seeks to impose onerous processes that go beyond the remit of a neighbourhood plan. Additional consultation requirements cannot be imposed on the City Council as the local planning authority through a neighbourhood plan, particularly as consultation requirements are governed by legislation. For these reasons we would suggest its omission. A better approach might be for the neighbourhood to encourage adoption of locally-specific good practice through a separate non-statutory document.</p> <p>No evidence has been provided for the threshold of scales of development in Appendix G, which has implications on the extent to which policies in the plan may be judged onerous in terms of effect on development viability. It also adds unnecessary detail and complexity to the plan. There are well-defined thresholds for major development set nationally and in the London and Westminster City plans; a further entirely separate set will simply add an unnecessary level of complication while doing nothing to contribute to sustainable development.</p> <p>Incidentally, under level 6 conservation area consent no longer exists.</p> <p>We would strongly urge the omission of this Appendix. A better approach might be for the neighbourhood to encourage adoption of locally-specific good practice through a separate non-statutory document.</p> <p>The extent to which some projects listed in Appendix H could properly be paid from using CIL is questionable – e.g. “enforce clean safe and quiet to the full extent of the law” (general projects point i), and “tighten size and weight restrictions on large vehicles using local roads” (area specific projects point e). Others (such as provision of broadband infrastructure) will involve state aid. It is also unclear why emissions from Grade I listed buildings are targeted (area specific projects point f) ahead of unlisted buildings subject to less constraints.</p>
Figures	Under figure 2b, the use of Hyde Park Barracks as military barracks is a sui generis use rather than C2a secure residential institution.

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

13 February 2018

Dear Sir / Madam,

We are writing to you in response to Westminster City Council's statutory consultation on the Knightsbridge Neighbourhood Plan (the 'Plan'). We strongly welcome the efforts of the Knightsbridge Neighbourhood Forum (KNF) in compiling the Plan. We feel it sets the right pathway towards a healthier, cleaner Knightsbridge with improved air quality.

The Bolloré Group jointly owns Bluepointlondon and Bluecity. We are currently delivering a £100m investment plan to ensure London is the global leader in electric vehicles (EV). Bluepointlondon took over the management of the Source London network of EV public on-street charge points. Bluecity, an entirely separate company, is London's first 100% EV point-to-point car sharing scheme.

In general, we support the premise of the Plan and particularly welcome efforts to improve air pollution through supporting a shift away from harmful polluting vehicles and towards EV. Below, we share our thoughts on the areas of the consultation most relevant to us.

KBR31: Motor vehicle use

We strongly welcome the premise that to improve air quality we need fewer cars and, where necessary, these be wholly sustainable electric vehicles (EVs). An objective of the Plan under KBR31 is to reduce the net number of cars and encourage further car clubs in residential areas. We know from our global experience that this is the right way to go. EV car sharing schemes (our model is point-to-point) reduce overall car use and can create a behaviour change in the way people use motor vehicles. Our car sharing scheme in Paris, for example, reduced the overall number of cars in Paris by 40,000 after 150,000 Parisians signed up to the scheme.

KBR32: Electric vehicle infrastructure

We welcome the requirement in KBR32 that EV charge point development should accompany developments ranging from Level 1 to 3 (appendix G). We particularly support the suggestions that new charging facilities should provide a dedicated parking space.

We agree fully with the policy where it says charge points should be "open access". The Source London network is designed to be open and accessible to all types of EV user and as part of that accessibility we're working towards a fully 'open access network'. This will ultimately mean that charge points are

available to use via a contactless credit card. As a first step we have introduced the 'flexi' Source London membership for those wanting to use the network ad hoc.

KBR32 says that developments (Level 1 to 3) should be equipped with "two-hour or faster electric vehicle charging points". We welcome a mixed charging solution and Source London is made up of a range of charge points. However, the majority of our chargepoints are 7kW which fully charge a car in 4 hours. We believe that a dense on-street network of 7kW charge points is key to encouraging the uptake of EVs. They are easy to install, put less of a strain on the national grid and do not aggressively wear the battery out in an EV. We believe, however, that there is a place for faster charge points for specific uses such as taxi fleets. Bluepointlondon are currently rolling-out a series of 22kW charge points in certain locations around London. In addition, we have announced a partnership with another EV charge point provider, CPS, who will incorporate 50kW charge points which will encourage more Londoner's to switch to EV.

Developer contributions

We support the "general principles" set out in relation to how developer contributions should be used by Westminster City Council.

Actions in the Neighbourhood Management Plan

Actions 65

We do not believe charge points have to be 'two hours or faster' for the reasons outlined above.

Conclusion

We look forward to tracking the progress of the Plan and we endorse its efforts to foster a healthier and more sustainable Knightsbridge.

Yours sincerely,

Cédric Bolloré
Directors

Christophe Arnaud



Defence
Infrastructure
Organisation

Robert Stone
Head of Estates

Telephone [MOD]:
Mobile:
Email

14 February 2018

Neighbourhood Planning
Policy and Strategy
Westminster City Council
6th Floor
5 Strand
London
WC2 5HR

Dear Sir/Madam,

**REPRESENTATIONS ON BEHALF OF THE DEFENCE INFRASTRUCTURE
ORGANISATION IN RESPECT OF THE KNIGHTSBRIDGE NEIGHBOURHOOD PLAN**

KNIGHTSBRIDGE NEIGHBOURHOOD PLAN 2017 – 2037

**THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012, REGULATION
16**

1. Introduction

- 1.1 This letter constitutes the Defence Infrastructure Organisation's (DIO) response to the Knightsbridge Neighbourhood Plan (KNP) and is submitted to Westminster City Council (WCC) in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (Regulations).
- 1.2 We request that any decision by WCC in respect of the KNP under Regulation 19 of the Regulations or otherwise is provided to the DIO.
- 1.3 The DIO plays a vital role in supporting our armed forces by building, maintaining and servicing what the men and women who serve our country need to live work, train and deploy on operations. DIO was established in 2011, following a defence reform review and is part of the Ministry of Defence (**MOD**). DIO's creation brought the management of all Defence Infrastructure together under a single organisation for the first time.

- 1.4 The DIO is part of the Ministry of Defence and manages the United Kingdom's defence infrastructure, which includes Hyde Park Barracks (**HPB**). HPB lies within the administrative boundary of the Knightsbridge Neighbourhood Area.
- 1.5 The Government's Strategic Defence and Security Review, published in 2016, set out an objective to reduce the size of the defence estate by 30 per cent by 2040. Achieving that objective requires a review of the defence estate in London and the DIO is undertaking that review. Paramount objectives are ensuring value for the public purse and meeting the needs of the Army.
- 1.6 The review included consideration of how barracks can most efficiently and effectively be provided in central London and, in that context, consideration is being given to the future of HPB. The review of sites for the State Ceremonial and Public Duties Units within Central London is known as **Project ROSE**.
- 1.7 The DIO's overriding concern is that the KNP should not prejudice its objectives for HPB.
- 1.8 In this letter of representation we set out:
 - a) DIO's overarching objectives for Project ROSE and the HPB site;
 - b) The reasons why the KNP does not meet the basic conditions and should not proceed to an Examination in Public; and
 - c) A detailed assessment of the policies relevant to HPB in the KNP, the basic conditions that we consider are not met, proposed alternative text for policies relevant to HPB and evidence supporting, and reasons for proposing, such alternative text.

2. DIO's objectives and compliance with the development plan

- 2.1 Project ROSE is part of the wider Defence Estates Optimisation programme and aims to provide modern fit for purpose facilities for the State Ceremonial and Public Duties units in Central London.
- 2.2 Project ROSE concerns units at Hyde Park Barracks (the Household Cavalry Mounted Regiment), Wellington Barracks (the Foot Guards) and the Kings Troop Royal Horse Artillery (KTRHA) currently located at Woolwich (Royal Artillery Barracks) and the Household Cavalry Band (HCav Band) located in Windsor.
- 2.3 The MOD is investigating how best to deliver State Ceremonial and Public Duties in London and are currently conducting detailed assessment studies to determine the best way forward. No decisions have yet been taken on future arrangements.
- 2.4 DIO note that WCC have allocated the eastern portion of the site for the following (Site Allocation Ref. G3):

Change of use from barracks to residential, including full on-site provision of affordable housing and the full range of housing sizes.

2.5 Whilst no decision has been taken on the future of HPB, it should be noted that DIO support the allocation.

3. The Basic Conditions

3.1 A neighbourhood plan must meet the basic conditions (Basic Conditions) described at Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. They include:

- a) That it is appropriate to make the plan having regard to national policies and guidance issued by the Secretary of State (Basic Condition A); and
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses it is appropriate to make the plan (Basic Condition B);
- c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the plan (Basic Condition C) ;
- d) The making of the plan contributes to the achievement of sustainable development (Basic Condition D);
- e) The making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (Basic Condition E);
- f) The making of the plan does not breach, and is otherwise in conformity, with EU obligations (Basic Condition F), and
- g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan (Basic Condition G).

3.2 In relation to the above, Basic Condition A requires neighbourhood plans to have appropriate regard to national policy and advice. Such policy and advice is set out within relevant Acts and the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

3.3 The strategic policies of the development plan which comprises the London Plan (2016), Westminster City Plan (2016) and Saved Policies from Westminster City Council's Unitary Development Plan (UDP) (2007).

3.4 The NPPG states that in considering whether a plan is in 'general conformity' the following should be assessed:

- a) Whether the plan supports the general principles of strategic policy.
- b) The degree of conflict between the neighbourhood and strategic policies.
- c) Whether the neighbourhood plan provides an additional level of detail to strategic policy without undermining that policy.
- d) The rationale for and evidence in support of the approach taken.

3.5 In short, a neighbourhood plan should set out a positive vision for development and must not seek to prevent development from coming forward.

4. KNP Overview

4.1 As currently drafted, the DIO consider that the KNP has not had appropriate regard to the Basic Conditions at Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990; particularly Basic Condition A, Basic Condition D and Basic Condition E.

4.2 The NPPF and NPPG act as the overarching framework and guidance for development as prescribed by Government. In addition to the NPPF and NPPG, the Plan should also consider the statutory requirements within the Planning (Listed Buildings and Conservation Areas) Act 1990. We note that throughout the Plan policies seek to restrict the development of sites within conservation areas or that neighbour, or affect the setting of, listed buildings.

4.3 In addition, the Plan does not positively support local development needs in relation to either employment generating floorspace or residential development.

4.4 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 14). There are three dimensions to sustainable development: economic, social and environmental. Crucially plans should seek to contribute to building a strong, responsive and competitive economy; supporting strong, vibrant and healthy communities; and contributing to protecting and enhancing the natural, built and historic environment. As drafted, many policies within the Plan fail to contribute to sustainable development, providing additional levels of detail to strategic policies undermining, those policies by imposing onerous conditions that would undermine the delivery of development.

4.5 We also consider that there is a lack of conformity with the strategic policies of the development plan, namely the objectives set at a strategic level by the London Plan (2016) and the City Plan (2016) at Page 21 – 22 which includes, inter alia:

- *To accommodate sustainable growth and change that will contribute to Westminster's role as the heart of a pre-eminent world class city, building on its internationally renowned business, retail, cultural, tourism and entertainment within the Central Activities Zone ... whilst maintaining its unique and historic character, mix, functions, and townscapes.*
- *To increase the supply of good quality housing to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs; whilst ensuring that new housing in commercial areas coexists alongside the business activity and appropriate balance of uses is maintained.*

4.6 The Neighbourhood Plan does not allocate sites for development to support this function. The lack of support towards future development at HPB within Policy KBR14 is considered to conflict with the aspirations of strategic policies in the development plan and in addition seeks to restrict the delivery of much needed homes.

- 4.7 The DIO are concerned with regards to the use of the test of *'tranquillity'*, particularly within Policies KBR13 and KBR14. *'Tranquillity'* is referred to as a Strategic Objective at Objective 7 of the City Plan as follows:

To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day by over one million workers and visitors.

- 4.8 This is reiterated at Policy S11 which relates to the Royal Parks which states:

The Royal Parks, their settings, views and tranquillity will be protected from inappropriate development and activity. Developments will only be allowed where they are essential and ancillary to maintaining or enhancing the value of the park as open space, and that do not harm the park's:

- *Open landscape character;*
- *Heritage value;*
- *Nature conservation value;*
- *Tranquillity; or*
- *Value as a public open space.*

- 4.9 The use *'tranquillity'* in the City Plan relates exclusively to development within the Royal Parks. Figure 28 of the Westminster City Plan (Page 72) confirms that HPB does not fall with the Royal Parks or Blue Ribbon Network and Figure 46 shows that HPB is not public open space. Therefore the imposition of a test of *'tranquillity'* is not supported by the development plan. No evidence is presented to justify the extension of the test of *'tranquillity'* to HPB and all MOL. Therefore, all reference to *'tranquillity'* should be deleted.

- 4.10 Detailed representations are found below in respect of KBR13 and KBR14 and at Appendix 1.

5. Policy KBR13

- 5.1 A large part of the neighbourhood area's Metropolitan Open Land (MOL) constitutes the HPB site. However, the KNP does not distinguish between the previously developed land at HPB and the open space, allocated as MOL, to the east of HPB.
- 5.2 Policy KBR13 seeks to extend the scope of London Plan Policy 7.17 (Metropolitan Open Land) which sets out the Greater London Authority's (GLA) position in relation to development on MOL. Policy 7.17 notes that *'The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as the Green Belt'*. The supporting text at Paragraph 7.56 of the London Plan refers to the policy guidance within Paragraphs 79 – 92 of the NPPF, noting that the policies in relation to the Green Belt apply equally to MOL.

- 5.3 The NPPF notes that inappropriate development is harmful to the Green Belt and should not be approved, except in the following instances:
- *buildings for agriculture and forestry;*
 - *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
 - *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
 - *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

5.4 As drafted, there is no reference to the exceptions permitted at Paragraph 89. Therefore KBR13 fails to be in compliance with Basic Condition A and Basic Condition E.

5.5 Detailed comments on KBR13 can be found at Appendix 1 and revised policy wording can be found at Appendix 2.

6. Policy KBR14

6.1 The strategic policy for HPB is set out at Site Allocation G3 which seeks the change of use of the barracks for c. 100 units. We note that failure to deliver these units would have an impact on WCC's ability to meet its housing need as defined by the London Plan and within the City Plan.

6.2 Development opportunities are under review by the DIO and it is considered that proposed policy KBR14, as drafted, is particularly onerous and does not comply with the principles of sustainable development, as it would restrict the use of the site.

6.3 Detailed comments on KBR14 can be found at Appendix 1 and revised policy wording can be found at Appendix 3.

6.4 We note that some of the criteria set out within the Policy KBR14 is not supported by evidence and therefore seeks to introduce additional parameters of site specific policy without evidence; further contributing to limiting the scope of development.

6.5 The proposed approach of a planning brief at HPB to inform future redevelopment is supported. This should be agreed between WCC and the developer/landowner in accordance with normal procedures.

7. Conclusion

- 7.1 For the reasons set out above and within the Appendices, it is considered that the Plan does not meet the basic conditions. In particular, it is considered inappropriate for the KNP to include policies in relation to HBP. The DIO consider that this policy should be deleted.
- 7.2 The DIO has proposed amended wording for policies KBR1, KBR5, KBR7, KBR13, KBR14 and KBR31 which we consider does meet the basic conditions and provides the DIO with the necessary flexibility to respond to the outcome of Project Rose.
- 7.3 The DIO requests that any Examination in Public includes an opportunity for oral submissions to be made so that the DIO can expand on the statements made in this Representation.
- 7.4 The DIO would welcome further dialogue with the Knightsbridge Neighbourhood Forum or Westminster City Council as required.

Kind regards

Robert Stone

Head of Estates

Appendix 1 – Detailed assessment of policies in the KNP

Policy Reference	Policy Wording	DIO Comments
<p>Policy KBR1(a)</p> <p>(Character, Design and Materials)</p>	<p>The importance of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing.</p>	<p>We object to Policy KBR1(a) as the policy seeks to impose onerous obligations on future development, contrary to policies within the development plan and the principles of sustainable development.</p> <p>As such, draft Policy KBR1(a) fails to meet Basic Condition D and Basic Condition E that requires neighbourhood plans to contribute to sustainable development and be in general conformity with the strategic policies of the development plan for the local area. The London Plan (Policy 7.4), inter alia, requires that design has regard to pattern and grain. However, it should be noted that the London Plan does not limit the scale, massing and height of buildings to that of its surrounding. Rather the obligation is to make sure that new development makes a positive contribution to the character of a place.</p> <p>In addition, Policy S28 of the Westminster City Council City Plan states that imaginative modern architecture is encouraged provided it respects Westminster's heritage and local distinctiveness.</p> <p>As currently drafted, there is no justification for the deviation from strategic policies and would limit the scope of achieving sustainable development.</p> <p>In line with Policy 7.4 of the London Plan and Policy S28 of the Westminster City</p>

Policy Reference	Policy Wording	DIO Comments
		<p>Council City Plan, we propose that the following amendment to KBR1(a) is made:</p> <p>The importance of making a positive contribution to the character of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing.</p>
<p>Policy KBR1(b) (Character Design and Materials)</p>	<p>For each of the respective Character Areas, showing respect in the design and choice of materials which enhances the following:</p> <ul style="list-style-type: none"> i) Area 1 ('Kensington Squares') – terraced buildings in stock brick, stucco, half stucco or stone. ii) Area 2 ('Albertopolis' 2) – buildings in red brick or terracotta, on large plots and of a large scale. iii) Area 3 ('Knightsbridge Green 	<p>We object to Policy KBR1(b) as the policy seeks to impose onerous obligations on future development, contrary to policies within the development plan and the principles of sustainable development.</p> <p>As such, draft Policy KBR1(b) fails to meet Basic Condition D and Basic Condition E that requires neighbourhood plans to contribute to sustainable development and be in general conformity with the strategic policies of the development plan for the local area.</p> <p>London Plan Policy 7.6 (c) states that new development should comprise details and materials that complement, not necessarily replicate, the local architectural character.</p> <p>As currently drafted, there is no justification for the deviation from strategic policies and would limit the scope of achieving sustainable development.</p>

Policy Reference	Policy Wording	DIO Comments
	<p>and Albert Gate') – red-brick, large scale buildings, with Knightsbridge Green having a singular townscape appearance and Albert Gate a mixed townscape appearance.</p>	<p>Therefore, we propose that Part (b) of Policy KBR1 is redrafted as follows:</p> <p>For each of the respective Character Areas, new development should complement the local architectural character of the surrounding area. comprise materials which complement the local architectural character. showing respect in the design and choice of materials which enhances the following:</p> <ul style="list-style-type: none"> i) Area 1 ('Kensington Squares') – terraced buildings in stock brick, stucco, half stucco or stone. ii) Area 2 ('Albertopolis' 2) – buildings in red brick or terracotta, on large plots and of a large scale. iii) Area 3 ('Knightsbridge Green and Albert Gate') – red brick, large scale buildings, with Knightsbridge Green having a singular townscape appearance and Albert Gate a mixed townscape appearance.
<p>Policy KBR1(c) (Character Design and Materials)</p>	<p>High quality materials should be used that respect the local setting and contribute positively to the particular Character Area or Conservation Area or the general surrounding area if outside of these designations.</p>	<p>We object to Policy KBR1(c) as the policy conflicts with Basic Condition A, Basic Condition C, Basic Condition D and Basic Condition E.</p> <p>Basic Condition C requires that the neighbourhood plans have regard to the desirability of preserving or enhancing the character or appearance of any conservation area. As drafted, Policy KBR1(c) seeks to extend the remit of the statutory requirement without justification. As a result, Policy KBR1(c) conflicts</p>

Policy Reference	Policy Wording	DIO Comments
		<p>with the statutory consideration and the NPPF which requires account to be taken of the desirability of preserving and enhancing the character and appearance of a conservation area.</p> <p>Policy KBR1(c) fails to meet Basic Condition E that requires neighbourhood plans to be in general conformity with the strategic policies of the development plan for the local area. London Plan Policy 7.6 (c) states that new development should comprise details and materials that complement, not necessarily replicate, the local architectural character. There is no justification for the deviation from the development plan.</p> <p>In addition, KBR1(c) we consider that proposing Character Areas to be included within this part of the policy unnecessary as they should not be afforded the same policy protection as statutorily designated conservation areas.</p> <p>The current wording of the policy therefore seeks to impose onerous obligations on future development, contrary to the principles of sustainable development and therefore fails to meet Basic Condition D.</p> <p>Therefore we propose that Part (c) of Policy KBR1 be deleted.</p>
Policy KBR5 (View north along	Proposals are expected to protect the view north along Montpelier Street	We object to Policy KBR5, because the policy is not justified and conflicts with the Basic Conditions.

Policy Reference	Policy Wording	DIO Comments
Montpellier Street)	from intrusive or insensitive development.	<p>We consider that as drafted Policy KBR5 conflicts with Basic Condition A, Basic Condition B, Basic Condition C, Basic Condition D and Basic Condition E which require conformity of neighbourhood plans with national and strategic policies and to contribute to achieving sustainable development.</p> <p>The view north along Montpellier Street has not been identified as being of regional or local importance within either the London Plan or Westminster City Council City Plan. We refer to Page 56 of the Knightsbridge Green and Albert Gate Conservation Area Audit which identifies important views within the conservation area. However, this document does not include the view north along Montpellier Street. We do not consider that neighbourhood plans should propose views, especially without justification.</p> <p>Policy S26 of the Westminster City Council states the following:</p> <p>The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development.</p> <p>The view is not a strategic view, as identified by the London Viewing Management Framework, nor a local view as identified by Westminster City Council.</p>

Policy Reference	Policy Wording	DIO Comments
		<p>We consider that Policy KBR5 does not reflect the contents of the Planning (Listed Buildings and Conservation Areas) Act 1990 or Section 12 of the NPPF that seek development to preserve or enhance the setting of conservation areas and listed buildings. It is noted that KBR5 seeks to restrict the quantum of development within the view north along Montpellier Street and therefore consider that the policy as drafted seeks to restrict achieving sustainable development. Any development north along Montpellier Street would be required by law to preserve or enhance the conservation area and listed buildings and therefore is already afforded protection.</p> <p>To conclude, Policy KBR5 should be deleted.</p>
<p>Policy KBR7 (A) (Tall Buildings)</p>	<p>Knightsbridge is generally not an appropriate location for tall buildings. These are defined as buildings that are significantly taller than their surroundings.</p>	<p>We object to Policy KBR7(a) as the policy seeks to be overly restrictive and fails to secure the opportunity for the delivery of sustainable development in line with the adopted development plan. Therefore, Policy KBR7(A) not comply with Basic Condition D, which requires a neighbourhood plan to contribute to the achievement of sustainable development, and Basic Condition E, which requires a neighbourhood plan to be in general conformity with strategic polices contained in the development plan.</p> <p>London Plan Policy 7.7 states that tall and large buildings should generally be limited to sites within the CAZ, Opportunity Areas, areas of intensification or town</p>

Policy Reference	Policy Wording	DIO Comments
		<p>centres that have good access to public transport.</p> <p>The neighbourhood area benefits from the above site specific designations and therefore the principle of tall buildings is acceptable. It is acknowledged that Westminster City Council consider there is limited opportunities for tall buildings. However, Policy S4 notes that tall buildings may be acceptable in a limited number of suitable locations where the council considers that they will not seriously harm the surrounding area and its heritage assets. Therefore, when tested against the London Plan and Westminster City Council policy, tall buildings should not be precluded within the neighbourhood area. Excluding tall buildings from the neighbourhood plan area therefore inhibits the ability for development be brought forward in line with the statutory development plan and therefore does not facilitate the delivery of sustainable development.</p> <p>We recommend that the policy is redrafted as follows:</p> <p><i>Tall buildings within the Knightsbridge Neighbourhood Plan Area may be acceptable in locations where they do not cause substantial harm to the surrounding area or its heritage. Knightsbridge is generally not an appropriate location for tall buildings. These are defined as buildings that are significantly taller than their surroundings.</i></p>

Policy Reference	Policy Wording	DIO Comments
<p>Policy KBR7 (B) (Tall Buildings)</p>	<p>In recognition of the sensitivity of the historic and lower-scale residential environment of Knightsbridge, tall buildings, including the alteration of existing tall buildings, will not be permitted in the Knightsbridge Neighbourhood Area where they would have an adverse impact upon any of the following:</p> <ul style="list-style-type: none"> a) the Royal Albert Hall or the Hyde Park or Kensington Gardens registered parks and gardens, or their setting; b) other heritage assets including listed buildings or local buildings or structures of merit, or their setting; c) the character and appearance of the Albert Gate, Knightsbridge, Knightsbridge 	<p>We object to Part B of Policy KBR7. As drafted, the Policy KBR7(B) conflicts with Basic Condition A, Basic Condition C and Basic Condition D.</p> <p>Part B of Policy KBR7 does not define <u>adverse impact</u>. Further, it does not acknowledge the statutory tests for harm set out within the NPPF. Therefore, this policy seeks to enhance the statutory protection afforded by national, regional and local planning policy in respect of seeking to preserve and enhance the character and appearance of conservation areas and preserving listed buildings.</p> <p>In addition, Policy KBR7 seeks to exclude tall buildings contrary to London Plan Policy 7.7(E). London Plan Policy 7.7(E) notes that tall building within sensitive locations should have regard to the surrounding context. As prepared, Policy KBR7(B) does not clarify 'adverse impact' and as such conflicts with the national, regional and local policy. Therefore, we consider that further detail is required within the policy to define <i>adverse</i> or propose its removal and replacement with wording commensurate to the aspirations of national, regional and local planning policies. In addition, as noted above we consider that the view north along Montpellier Street should be deleted. Therefore the reference at (e) should also be deleted.</p> <p>To conclude, we propose the following amendments to KBR7(B):</p> <p><i>In recognition of the sensitivity of the historic and lower-scale residential</i></p>

Policy Reference	Policy Wording	DIO Comments
	<p>Green or Royal Parks Conservation Areas;</p> <p>d) significant or important views, both strategic and local, including townscape views and historic skyline features;</p> <p>e) the view north along Montpelier Street (identified in Policy KBR5); or</p> <p>f) the setting or openness of open spaces including Local Green Spaces or Metropolitan Open Land.</p> <p>Any exceptions to this policy must comply fully with the tests in the NPPF in relation to the conservation and enhancement of the historic environment.</p>	<p><i>environment of Knightsbridge, tall buildings, including the alteration of existing tall buildings, will not be permitted in the Knightsbridge Neighbourhood Area where they would have an adverse impact upon any of the following should have regard to the following:</i></p> <p>a) <i>preserving and enhancing the Royal Albert Hall or the Hyde Park or Kensington Gardens registered parks and gardens and or their setting;</i></p> <p>b) <i>preserving other heritage assets including listed buildings or local buildings or structures of merit and or their setting;</i></p> <p>c) <i>preserving and enhancing the character and appearance of the Albert Gate, Knightsbridge, Knightsbridge Green or Royal Parks Conservation Areas;</i></p> <p>d) <i>the impact on significant or important views, both strategic and local, including townscape views and historic skyline features;</i></p> <p>e) <i>the view north along Montpelier Street (identified in Policy KBR5); or</i></p> <p>f) <i>the setting or openness of open spaces including Local Green Spaces or Metropolitan Open Land.</i></p> <p><i>Any exceptions to this policy must comply fully with the tests in the NPPF in</i></p>

Policy Reference	Policy Wording	DIO Comments
		<i>relation to the conservation and enhancement of the historic environment.</i>
Policy KBR7 (C) (Tall Buildings)	<p>Development proposals for tall buildings are expected to demonstrate how they:</p> <ul style="list-style-type: none"> a) have analysed possible adverse impacts and benefits of the proposals; b) will provide a high quality public realm at ground level that increases permeability for pedestrians; c) will enhance the character and amenity of their surroundings, including the relationship with existing tall buildings, not only at ground floor and lower levels but at the highest points that any tall buildings reach; 	<p>We raise concerns in respect of Policy C(a) of Policy KBR7.</p> <p>Part C (a) of Policy KBR7 is not accurate and does not define adverse impact, contrary to the requirements of Basic Condition A and seeks greater detail than that imposed by the development plan, contrary to the requirements of Basic Condition E.</p> <p>The London Plan notes at Policy 7.7 that tall buildings ‘should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunications interference’.</p> <p>We consider that Part C(a) should be updated to be more specific and in accordance with London Plan Policy 7.7 as follows:</p> <p>Development proposals for tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise and solar glare.</p> <p>In addition, tall buildings should seek to enhance the quality of the public realm at ground level.</p> <p>We consider that Part (d) should be deleted as the impact of tall buildings on</p>

Policy Reference	Policy Wording	DIO Comments
	<p>and</p> <p>d) have taken full account of the significance of heritage assets and their settings including with respect to their conservation.</p>	<p>heritage assets is controlled through national planning policies and policies within the existing development plan.</p>
<p>KBR13 (A) (Metropolitan Open Land)</p>	<p>The character and function of the Metropolitan Open land will be protected and enhanced, including views, tranquillity, its openness, nature conservation value and historic parkland features, which forms a setting to the adjacent Conservation Areas and Royal Parks.</p>	<p>We object to Policy KBR13(A). As drafted Policy KBR13(A) conflicts with Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>It is noted that the strongest protection should be given to Metropolitan Open Land and inappropriate development should be refused (London Plan Policy 7.17). In addition, there is no reference to development which is considered acceptable within Metropolitan Open Land, as set out within Paragraph 89 of the NPPF.</p> <p>In addition, Policy KBR13 deals with Metropolitan Open Land and should not refer to the assets. Therefore, the following text should be deleted from Part A: <i>‘which forms a setting to the adjacent Conservation Areas and Royal Parks’</i>. The impact of development on the Conservation Area is subject to different statutory and policy tests and is dealt with in Policy KBR1 of this Plan.</p>

Policy Reference	Policy Wording	DIO Comments
		<p>As noted above, there is no reference to the instances when development is considered acceptable in Metropolitan Open Land; specifically the redevelopment of previously developed land. Policy KBR13(A) does not differentiate between the barracks site, which comprises the majority of the Knightsbridge Neighbourhood Plan area's Metropolitan Open Land, and open space land to the west of the barracks site.</p> <p>Furthermore, Policy KBR13(A) seeks to provide additional detail to London Plan policy for Metropolitan Open Land, which it is not appropriate for a neighbourhood plan to do.</p> <p>Therefore, the following amendments are proposed:</p> <p><i>The character and function of the Metropolitan Open land will be protected from inappropriate development protected and enhanced, including views, tranquillity, its openness, nature conservation value and historic parkland features, which forms a setting to the adjacent Conservation Areas and Royal Parks. Construction of new buildings should be considered inappropriate unless:</i></p> <ul style="list-style-type: none"> <i>• the buildings proposed are for agriculture and forestry;</i> <i>• the development provides appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the</i>

Policy Reference	Policy Wording	DIO Comments
		<p><i>Green Belt and does not conflict with the purposes of including land within it;</i></p> <ul style="list-style-type: none"> <i>• the proposals seeks extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</i> <i>• the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</i> <i>• limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or</i> <i>• limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use(excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.</i>
Policy KBR13 (D) (Metropolitan Open Land)	Development proposals in the Neighbourhood Area’s MOL should: a) maintain and strengthen the historic functions of the	We object to Policy KBR13(D) as drafted as there is no evidence to justify the policy and therefore it is not in compliance with Basic Condition A. We provide comments for the component parts of the Policy KBR13(D) below:

Policy Reference	Policy Wording	DIO Comments
	<p>Neighbourhood Area's MOL as an integral part of the Royal Parks;</p> <p>b) increase permeability and connectivity for pedestrians and cyclists north south across the MOL and seek to reduce the vehicular dominance of South Carriage Drive;</p> <p>c) plan for the next generation of trees and maintain the MOL's treeline to the south of South Carriage Drive and its extent of visibility in all protected and other relevant views from and to Hyde Park and Kensington Gardens. Any relevant proposals should be supported by accurate visual representations against views</p>	<p>a) There is no evidence to support the policy. This should be deleted.</p> <p>b) There is no transport evidence to justify the requirement for development proposals to provide connectivity for pedestrians. With particular reference to Hyde Park Barracks, the site is impermeable and therefore there is no permeability. Therefore, as noted within NPPF Paragraph 89, infilling, partial or complete redevelopment of previously developed sites is acceptable in instances where the proposals would not have a greater impact on openness and the purpose of including land within it than the existing development. There is no obligation to increase permeability.</p> <p>c) This sub-section of Policy KBR13(D) is inaccurate as there are no trees to the south of South Carriage Drive. This should be deleted.</p> <p>d) London Plan Policy 7.6(c) states that new development should comprise details and materials that complement, not necessarily replicate, the local architectural character. In addition, it should be noted that planning policy does not preclude tall buildings from Metropolitan Open Land. Proposed alterations to KBR13 (A) result in Part (D)(d) being no longer required. In addition, materials and design are dealt with at Policy KBR1. Therefore Part (d) of Policy KBR13(D) should be deleted.</p> <p>Policy KBR13(D) is not supported by evidence to justify the limitations on</p>

Policy Reference	Policy Wording	DIO Comments
	<p>agreed with the City Council; and</p> <p>d) maintain consistency with the character of the surrounding area in terms of height, bulk and massing, materiality and character of the urban edge that forms a setting to the MOL and the Royal Parks. The MOL is not an appropriate location for new tall buildings, defined as buildings that are significantly taller than their surroundings.</p>	<p>development and therefore is contrary to Basic Condition E and Basic Condition D which require a neighbourhood plan to comply with the local development plan and to contribute to the achievement of sustainable development. However, as drafted, KBR13(D) seeks to limit the ability of policy to achieve sustainable development; contrary to the adopted development plan.</p> <p>The amendments to Policy KBR13(A) result in there being no requirement for Policy KBR13(D). Therefore, we consider that Policy KBR13(D) should be deleted.</p>
<p>Policy KBR14 (A) (The Hyde Park Barracks Land)</p>	<p>Development at the Hyde Park Barracks strategic housing site and relevant adjacent buildings should retain and enhance neighbouring residential amenity and the tranquillity of neighbouring open spaces and</p>	<p>To ensure compliance with Basic Condition E, Policy KBR14(A) should be updated to refer to site allocation policy G3 of the Local Plan in respect of the minimum quantum of development at Hyde Park Barracks.</p> <p>In addition, reference to <i>'tranquillity of open spaces'</i> should be deleted as there is no justification for its conclusion.</p>

Policy Reference	Policy Wording	DIO Comments
	MOL.	We propose that KBR14(A) should be incorporated into KBR14(C) and therefore KBR14(A) should be deleted.
Policy KBR14 (B) (The Hyde Park Barracks Land)	The retention of the barracks use on the whole or part of the site is supported, as is reversion of all or part of the site to parkland.	<p>We object to the inclusion of Policy KBR14(B) as it seeks to inhibit the delivery of development at the barracks, contrary to Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>Neighbourhood plans are required to have regard to national policy. The NPPF notes that planning policies and decision should encourage the effective use of land by reusing land which has been previously developed provided that it is not of high environmental value (Paragraph 111). Whilst Hyde Park Barracks is located within Metropolitan Open Land, the site satisfies the exemptions for development set out at Paragraph 89. In addition, we refer to Paragraph 22 of the NPPF which notes that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. As identified within the covering letter, the purpose of Project ROSE is to consolidate the Estate and therefore, Hyde Park Barracks is under review.</p> <p>Policy KBR14(B) conflicts with the Site Allocation G3 set out within Westminster City Council's City Plan and therefore is not relevant to be included as this fails to acknowledge the acceptability of the site for reuse for a different purpose.</p>

Policy Reference	Policy Wording	DIO Comments
		<p>KBR14(B) seeks to restrict development at Hyde Park Barracks, and therefore seeks to inhibit the sustainable development of the site and therefore Policy KBR14(B) does not meet Basic Condition D.</p> <p>We consider that Policy KBR14(B) should be deleted.</p>
<p>Policy KBR14 (C) (The Hyde Park Barracks Land)</p>	<p>Residential use (Class C3, and elder person's accommodation under Class C2) is considered to be the only acceptable alternative use to a barracks use. Non-residential uses are not acceptable on the site (including as part of a mixed use development), including town centre uses, commercial, tourism, arts, cultural and educational uses, which should be directed to the Strategic Cultural Area or designated shopping centres in line with development plan policies.</p>	<p>We object to KBR14(C) as the policy does not reflect national planning policy or policies set out within the Local Plan.</p> <p>Part C seeks to restrict the types of uses. This contradicts the principles of sustainable development and the core planning principles within the NPPF (Paragraph 17) which supports the promotion of mixed use developments.</p> <p>It should be noted that, given the accessibility and location within the Core Activities Zone, the site is suitable for a variety of uses as set out within the London Plan and the Westminster City Plan. Therefore as drafted, Policy KBR14(C) conflicts with the development plan and fails to support the principles of sustainable development, contrary to Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>We propose that Policy KBR14(C) is redrafted to reflect the core planning principles of the NPPF to deliver mixed use developments through an acceptance at Part C that development could be brought forward for residential led mixed use</p>

Policy Reference	Policy Wording	DIO Comments
		<p>development.</p> <p>Amended wording is set out below:</p> <p><i>Redevelopment of the Hyde Parks Barracks site, unless for military function, should provide a mixture of uses, within a residential led mixed use development providing a minimum of 100 new homes and complementary town centre uses (as defined by the NPPF).</i></p>
<p>Policy KBR14 (D) (The Hyde Park Barracks Land)</p>	<p>Development proposals on the site (including refurbishment, demolition and either partial or full redevelopment and subterranean development) must be justified against the following criteria:</p> <p>a) The height, bulk and massing of any proposals should reflect the scale and character of the local built environment, in consideration of identified views (including those from Hyde Park and Kensington</p>	<p>We object to Policy KBR14(D) as the policy seeks to impose onerous conditions on the development of the Hyde Park Barracks site which conflict with the policies set out within the development plan. Policy KBR14(D) as currently drafted conflicts with Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>Part (a) of KBR14(D) conflicts with the London Plan (Policy 7.4) which, inter alia, requires that design has regard to the pattern and grain of the surrounding area. However, it should be noted that the London Plan does not limit the scale, massing and height of buildings to that of its surroundings. Rather the obligation is to make sure that new development makes a positive contribution to the character of a place.</p> <p>In addition, Policy S28 of the Local Plan states that imaginative modern architecture is encouraged provided it respects Westminster’s heritage and local</p>

Policy Reference	Policy Wording	DIO Comments
	<p>Gardens). It should maintain and enhance neighbouring residential amenity and all other relevant material considerations. The site is not an appropriate location for new tall buildings, and development should not exceed the existing built footprint and maintain existing separation distances between buildings.</p> <p>b) Development must provide permanent public pedestrian routes through the Hyde Park Barracks land, creating permeability within the site in a north-south direction and enhancing views through the MOL to Hyde Park.</p> <p>c) Development should include</p>	<p>distinctiveness.</p> <p>In respect of KBR14(D)(b), there is no evidence to support a policy requiring permanent pedestrian access through Hyde Park Barracks. Any redevelopment proposals would have to meet the requirements for development within Metropolitan Open Land (Paragraph 89 of the NPPF). Paragraph 89 provides that the redevelopment of previously developed sites, which do not have a greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development, should not be considered inappropriate.</p> <p>Therefore, given the site is currently impermeable and not open; there would be no requirement for this should the site be redeveloped.</p> <p>Policy KBR(D)(c) is not justified. The area is not within an area of open space deficiency and therefore there is no requirement for development proposals at the site to provide open space.</p> <p>On the basis of the above, we provide amended wording below:</p> <p><i>Development proposals on the site (including refurbishment, demolition and either partial or full redevelopment and subterranean development) should have regard to must be justified against the following criteria:</i></p>

Policy Reference	Policy Wording	DIO Comments
	<p>the provision of publicly accessible open and green space as part of comprehensive landscaping proposals to enhance the local environment, including tree planting and appropriate softening of the edge of the site, to enhance the openness of the wider MOL designation.</p>	<p><i>a) The pattern and grain of the surrounding area.</i></p> <p><i>b) Maintain neighbouring residential amenity.</i></p> <p><i>c) Preserving and enhancing designated heritage assets.</i></p> <p><i>d) Openness of Metropolitan Open Space.</i></p> <p><i>e) An appropriate provision of semi-public open space.</i></p> <p><i>a) The height, bulk and massing of any proposals should reflect the scale and character of the local built environment, in consideration of identified views (including those from Hyde Park and Kensington Gardens). It should maintain and enhance neighbouring residential amenity and all other relevant material considerations. The site is not an appropriate location for new tall buildings, and development should not exceed the existing built footprint and maintain existing separation distances between buildings.</i></p> <p><i>b) Development must provide permanent public pedestrian routes through the Hyde Park Barracks land, creating permeability within the site in a north-south direction and enhancing views through the MOL to Hyde Park.</i></p> <p><i>c) Development should include the provision of publicly accessible open and</i></p>

Policy Reference	Policy Wording	DIO Comments
		<p>green space as part of comprehensive landscaping proposals to enhance the local environment, including tree planting and appropriate softening of the edge of the site, to enhance the openness of the wider MOL designation.</p>
<p>Policy KBR14 (G) (The Hyde Park Barracks Land)</p>	<p>All access, egress, drop-off and collection (including by taxi or minicab), servicing (including refuse servicing) and deliveries must only take place within buildings located within the site boundary and not on-street.</p>	<p>We object to Policy KBR14 as there is no evidence to support the policy and therefore is not in compliance with Basic Condition A.</p> <p>It is noted that the taxi and minicab operations are regulated by the GLA and not the local planning authority or a neighbourhood forum.</p> <p>In addition, there would be no mechanism to restrict drop-off and collection without an amended traffic regulation order as a condition would not be enforceable. Accordingly, the policy fails the tests set out at Paragraph 206 of the NPPF.</p> <p>Therefore Part G should be deleted.</p>
<p>Policy KBR14 (H) (The Hyde Park</p>	<p>Any residential car parking must be provided on-site and off street, within buildings within the site. Parking proposed for residential use should</p>	<p>We object to KBR14(H) . As drafted Policy KBR14(H) conflicts with the London Plan and Policy KBR31(A) of the Neighbourhood Plan.</p>

Policy Reference	Policy Wording	DIO Comments
Barracks Land)	aim for significantly less than one space per unit. Electric vehicle charging provision above London Plan requirements is encouraged.	<p>We propose the following amendments:</p> <p><i>Any residential car parking must be provided on-site and off street, within buildings within the site. Parking proposed for residential use should aim for significantly less than one space per unit. Electric vehicle charging, as required by the London Plan should be provided. provision above London Plan requirements is encouraged.</i></p>
Paragraph 3.16	Development proposals for the site should be informed by a planning brief or development opportunity framework, drawn up by the City Council in close consultation with local stakeholders and residents, covering all relevant planning issues and other material considerations.	<p>Paragraph 3.16 of the KNP sets out a requirement for a planning brief or development framework to be prepared and adopted by Westminster City Council prior to development proposals being submitted by an applicant.</p> <p>We consider that the content of Paragraph 3.16 should be included within Policy 3.16 rather than in the supporting text.</p> <p>The planning brief should be agreed between WCC and the landowner/developer.</p> <p>Please refer to Appendix 3 for proposed amended wording.</p>
Policy KBR31 (A) (Motor vehicle use)	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	<p>We object to Policy KBR31(A). As currently drafted, Policy KBR31(A) conflicts with the London Plan parking standards. Therefore is not compliant with Basic Condition E.</p> <p>The London Plan seeks to reduce the reliance on motor vehicles in areas of high</p>

Policy Reference	Policy Wording	DIO Comments
	<p>with the exception of designated parking for Blue Badge holders.</p>	<p>public transport accessibility, and in these instances support car free developments.</p> <p>We consider that in light of the above, Policy KBR31(A) should adopt a similar presumption in reducing the reliance on motor vehicles and be updated as follows:</p> <p><i>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.</i></p>

Appendix 2 – Policy KBR13

The character and function of the Metropolitan Open land will be protected from inappropriate development. Construction of new buildings should be considered inappropriate unless:

- the buildings proposed are for agriculture and forestry;
- the development provides appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the proposals seeks extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use(excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- Development proposals will only be acceptable in very special circumstances in line with this and other policies in the development plan.

The re-use of existing buildings that contribute positively to the MOL's character and function will be encouraged where practicable and viable.

Appendix 3 – Policy KBR14

Development at the Hyde Park Barracks site should be informed by a planning brief which is to be agreed with Westminster City Council and the developer/landowner.

Redevelopment of the Hyde Parks Barracks site, unless for military function, should provide a mixture of uses, within a residential led mixed use development providing a minimum of 100 new homes and complementary town centre uses (as defined by the NPPF).

Development proposals on the site (including refurbishment, demolition and either partial or full redevelopment and subterranean development) should have regard to:

- a) The pattern and grain of the surrounding area.
- b) Maintain neighbouring residential amenity.
- c) Preserving and enhancing designated heritage assets.
- d) Openness of Metropolitan Open Space.
- e) An appropriate provision of semi-public open space.

Plant equipment should be located at the basement level of any proposed development. Any proposed roof-level provision of services, plant, machinery or flues must be depicted in any planning application and must be included in accurate visual representations of the proposals against which an application will be assessed.

All access for vehicles (construction and operational) to the site must be via Knightsbridge, South Carriage Drive and Main Roads only.

Any residential car parking must be provided on-site and off street, within buildings within the site. Parking proposed for residential use should aim for one space per unit. Electric vehicle charging, as required by the London Plan should be provided.

From: John Cox
Sent: 13 February 2018 14:32
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Forum Plan

Importance: High

This is a response to the consultation on the submitted Knightsbridge Neighbourhood Forum Plan.

1. "We want people to be able to influence decisions about **new and modified buildings and facilities** in their area". This was the mandate provided by the 2011 Localism Act for establishing Neighbourhood Forums and their remit concerning **Planning policies**.
2. The plan should be an important opportunity to establish the local community interest in enhancing the underlying planning policy imperative to protect and restore the character and heritage features of the area, in regard to buildings, streetscape and natural environment.
3. The plan should play a central and selective role in **focussing major planning policy issues**, particularly the development of the Barracks site, which have considerable potential impact to impair or enhance the character of the designated area and are legitimate local interests of residents and other stakeholders. Lack of selectivity in the plan risks diverting attention from strategic priorities.
4. Westminster City Council has an experienced and well established Planning Authority, and many of the prescriptive policy proposals in the plan risk usurping existing sound policy and practice. Consistency in policy application is essential as is effective building control, and there is a strong case to integrate the processes of planning and building regulation, possibly also with party wall agreements. (This is not covered in the plan but would greatly improve stakeholder's experience). Further the designated area is but part of the more widely recognised Knightsbridge and policy alignment between areas is needed.
5. The Plan as submitted includes policy proposals, important in their own right, eg on health and education, which are not covered by the mandate and risk obscuring the priority planning issues. Policies concerning public transport, cycling and clean air are not in the unique gift of the designated area and vitally require City wide formulation and adoption.
6. Community concerns and interests are very well monitored and represented by established Associations. It is important that the Forum as an additional layer of intervention and potential bureaucracy does not add delay and cost to planning procedures. The scope for ambiguity on policy emerging is a concern. It is vital that residents continue to make representations on planning issues directly to their democratically elected local authority responsible for consultation, determining and implementing policy. Therefore, perhaps the value of continuing the Forum should be reviewed.

John C L Cox CBE
Owner/Resident

From: The Knightsbridge Concierge
Sent: 13 February 2018 14:36
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan - Submission (Regulation 16) Consultation

Dear Sir / Madam,

I am writing with the wish to confirm my support for the Knightsbridge Management Plan. I've been working in the Knightsbridge area for the past few years and take great pride and enjoyment from area.

I believe the plan correctly covers the important areas of air pollution, the cleanliness of the area and most importantly the proposed development of the Barracks. I also support the neighbourhood Stress area around Raphael Street and Knightsbridge Green.

Yours sincerely
Stewart Provins

Concierge – Resident Services
Knightsbridge Residents Management Company Limited

W: www.theknightsbridge.com

From: Lorraine Buckland
Sent: 13 February 2018 16:35
To: Neighbourhood, Planning: WCC
Subject: Re. Consultation on the Knightsbridge Neighbourhood Plan

13 February 2018

Re. Consultation on the Knightsbridge Neighbourhood Plan

I am a local resident living in _____ and wanted to add my full support for the Knightsbridge Neighbourhood Plan, which aims to preserve or improve the character and appearance of the area and reinforce its sense of community. I am particularly interested in the following proposed policies:

- KBR1: Character, design and materials
- KBR2: Commercial frontages, signage and lighting
- KBR4: Public realm and heritage features
- KBR7: Tall buildings
- KBR11: Urban greening
- KBR14: The Hyde Park Barracks
- KBR15: Neighbourhood Stress Area
- KBR22: Household and commercial waste consolidation

I also support the Plan's Part Two – Knightsbridge Management Plan.

The Knightsbridge Business Group

13th February 2018

FAO Sean Walsh
Neighbourhood Planning
Policy and Strategy
Westminster City Council
6th floor, 5 Strand
London WC2N 5HR

By email to neighbourhoodplanning@westminster.gov.uk

Knightsbridge Neighbourhood Forum
Westminster's Regulation 16

The Knightsbridge Business Group (KBG) welcomes the submission of the Draft Neighbourhood Plan (NP), which accurately captures the key planning issues of importance to our members, including around land uses and more day to day management and quality of life issues that are of significant importance to the KBG, and indeed to residents of the Knightsbridge area.

The Community section of the NP covers many of the business related uses and issues of importance to the KBG, and is supported. We support the policy approach towards enhancing the Knightsbridge International Shopping Centre (KBR18), which is one of only two such designated centres in London, illustrating its importance as a retail destination. In hand with this, the KBG supports the approach to the design of commercial and retail frontages set out in KBR2, which should be of a quality and character that is in fitting with the Knightsbridge area.

The balance of land uses is of key importance, with the emphasis on supporting and enhancing the retail offer in the International Shopping Centre being of primary importance. Beyond this, the introduction of night time and early morning uses adjacent to residential areas is acknowledged as something that requires careful consideration and management, while the protection of public houses is also supported under policy KBR19. In addition, the protection and promotion of office uses as set out in KBR21 is supported, as a use that brings diversity to the Knightsbridge area, and supports the introduction or growth of businesses in the area.

Outside of land use issues, the KBG strongly supports the approach taken in the NP towards the enhancement of the public realm and local environment, which will benefit all users of the Knightsbridge area including businesses, residents and visitors. The quality of the built and natural environment is of key importance to the businesses in the area, as are considerations such as air quality and noise, making it an attractive area to work in and visit, and one that is safe to navigate in line with the NP policies. The general upkeep, safety and cleanliness of these spaces is of key importance to businesses, including for example the standard of lighting, pedestrian crossings, CCTV, signage and other considerations.

Knightsbridge Business Group; Secretary: Carol De Juan,

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The Knightsbridge Business Group

Beyond this, the quality of utilities, communications infrastructure and public transport is of paramount importance to supporting the success of businesses, and also more generally towards enhancing London's World City status, as set out in the NP. In hand with this is the importance of effectively managing the waste, servicing and delivery arrangements of businesses and other occupiers requires ongoing review as set out in KBR22.

The management of construction activities, which can have an impact on businesses adjacent to development sites in terms of noise, disturbance and interruption, vehicle movements and other considerations are supported as set out in the NP.

In summary, the KBG supports the land use policies that support the international shopping centre, the office sector, and those that seek to balance the introduction of other uses in Knightsbridge. Beyond this, the group supports the key environmental, public realm and transport policies in the plan, which is of key importance to creating a safe, attractive and successful place for all users of the Knightsbridge area. In addition, the focus on the operation and management of specific uses, on waste and servicing, and also on managing construction activity is supported as day to day issues that have the ability to cause disruption and nuisance if not addressed fully and appropriately, which the NP seeks to do.

Yours faithfully,

For and on behalf of
The Knightsbridge Business Group
Carol De Juan, Secretary.

Belmond Cadogan;The Berkeley;C. Hoare & Co;Cadogan;Chestertons;Child & Child;
Gladwell & Patterson;Grace Belgravia;Grosvenor;Harrods;Harvey Nichols;Jones Lang LaSalle;
Jumeirah Carlton Tower;The Hari;The Knightsbridge;KnightsbridgeEstate;
KnightsbridgeSchool;TheLanesborough;Mandarin Oriental Hyde Park;Miles Commercial;Mosimann's;
Park Tower Casino;The Park Tower Knightsbridge;Pegasi Management Company;

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Household Cavalry Regiment

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From: Anna Birkett
Sent: 13 February 2018 18:11
To: Neighbourhood, Planning: WCC
Subject: Response to the consultation on the draft Knightsbridge Neighbourhood Plan

I am writing to confirm my support for the draft Neighbourhood Plan put forward for consultation by the Knightsbridge Neighbourhood Forum. I am a resident who has had a family home in this area since 1971 and been a full time resident since 1995.

Knightsbridge is an area which has seen significant development and change in the last 10-15 years and much of it has been to the detriment of the amenity of local residents. A fully researched and thought through plan of the kind put forward by the Forum will be most welcome as a means to help manage the future development and management of the area to the benefit of businesses, residents, the cultural occupants and our many visitors.

I particularly support the concept of the Neighbourhood Stress Area as a means of dealing with the rapid and unacceptable decline in the state of our streets due to overcrowding and rubbish as well as in the summer months the nuisance caused by pedicabs. The proliferation of cafes and restaurants in the Brompton Road and Montpelier Street in particular is having a very negative impact on the amenity of local residents all year round. The policy dealing with construction activity is also very welcome as I have had many experience over the last 10 years of 7 day per week noise from construction sites and constant problems of litter and dirt as well as excessive traffic movements in narrow streets of large trucks which cause blocked roads and damage to pavements.

I also strongly support the proposed policy relating to the Hyde Park Barracks which is a unique and key part of our area. Retaining the Household Cavalry and ensuring that any redevelopment of part of that site is carried out with due regard to not increasing the overall size, height, bulk and footprint of buildings is essential to preserve the character of the area and to avoid the mistakes of the recent past when buildings of excessive bulk have been built as replacements for smaller buildings.

I very much hope that the plan is fully adopted and am confident that if it is it will be greatly to the benefit of all the stakeholders in this area.

Your sincerely

Anna Birkett

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Anna Birkett

From: Jane Bradbury
Sent: 13 February 2018 18:28
To: Neighbourhood, Planning: WCC
Subject: Support from the Montpelier Square Garden Association

13 February 2018

To whom it may concern,

As members of the Committee responsible for managing the Montpelier Square Garden Association, vested by the Metropolitan Board of Works under the Towns Protection Act of 1863, we wish to express our support for the Knightsbridge Neighbourhood Plan in so far as it affects Montpelier Square. This includes all the proposals in relation to tree management and planning.

Yours faithfully,

Jane Bradbury

Nicholas Davie-Thornhill

Christopher Didizian

Ali Malek

Janet Marshall

Costas Michaelides

Daniel Quirici