

From: Jane Bradbury
Sent: 13 February 2018 18:34
To: Neighbourhood, Planning: WCC
Subject: Support for the Knightsbridge Neighbourhood Plan

To whom it may concern,

I was very impressed when I read the Knightsbridge Neighbourhood Plan Submission and heartily support it. The proposals will help safeguard our area, prevent tall buildings constructed near Hyde Park, promote green spaces and encourage tree planting and appropriate architecture, and much more. I look forward to being able to vote for this plan.

Your sincerely,

Jane Bradbury

From: Melissa Woolford
13 February 2018 19:53
Sent: Neighbourhood, Planning: WCC
To: Knightsbridge neighbourhood plan
Subject:

Dear Sir/Madam,

I endorse the Knightsbridge neighbourhood plan as a resident and Director of a local cultural institution.

As a mother and resident, I endorse the need to improve the air quality as well as keep the neighbourhood safe by decreasing the speed limit and improving litter collection. It is also incredibly important to develop the public realm in such a way that is smart and safe, aesthetically pleasing and sensitive.

As the Director of the Museum of Architecture (MoA), we are looking for a permanent home in the area, and I am therefore keen to see the growth of cultural organisations in Knightsbridge.

I endorse the use of buildings as pop-ups as MoA has done for past exhibitions that have drawn in both the local community as well as new audiences and therefore monetary benefit for local businesses to the area. We have had incredible support and praise from the community which is very much engaged with their neighbouring cultural institutions and are very interested in building on these relationships in a more permanent way.

I look forward to continue to live and work within the Knightsbridge community under a plan that promotes cultural organisations as active members of the neighbourhood, and supports the best in education for my children, preserving the past and unlocking our understanding of the future for a better tomorrow and years to come.

Best wishes,
Melissa

Melissa Woolford
Founder and Director
www.museumofarchitecture.org

From: Emily Candler
Sent: 13 February 2018 20:26
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan: Exhibition Road Cultural Group Response to Reg 16 Consultation

Regulation 16 Knightsbridge Neighbourhood Plan consultation

The Exhibition Road Cultural Group welcome this opportunity to respond to the Regulation 16 consultation on the Draft Knightsbridge Neighbourhood Plan.

When it was established in 2015, the Knightsbridge Neighbourhood Forum made a commitment to consult widely on ways to protect, preserve and enhance the unique character of the area; support sustainability; and enhance the area's suitability for local institutions and ensure the public realm works well for the high volumes of visitors, staff and students as well as everyone who lives here. We welcomed this collaborative approach, particularly as Westminster City Council had designated the Knightsbridge Neighbourhood Area as a Residential Area, meaning the many large institutions, businesses and organisations within the area do not have a vote on the adoption of the Plan. Over the past three years, the Knightsbridge Neighbourhood Forum has provided a valuable opportunity to bring together residents, institutions and businesses to work together to ensure this area continues to thrive and is a place people enjoy visiting, working, studying and living for generations to come. We welcome the way the Forum has developed the Draft Neighbourhood Plan in extensive consultation with residents, businesses and organisations both within the Neighbourhood Area and in neighbouring Royal Borough of Kensington & Chelsea. This is reflected in the final submission of the Draft Neighbourhood Plan, which comprehensively covers and reflects local planning issues and seeks to balance supporting a thriving and historic cultural quarter and international shopping district, alongside an established residential area.

Individual members of the Exhibition Road Cultural Group may respond in relation to policies that impact upon their estates. This response covers areas relating to the cultural quarter as a whole, specifically policies: KBR26 and KBR27.

The World's First Planned Cultural Quarter

Shared history and mission

The Exhibition Road Cultural Group is a partnership of 18 leading cultural and educational organisations in and around Exhibition Road, South Kensington. Together these organisations comprise the world's first planned cultural quarter, half of which falls within the Knightsbridge Neighbourhood Area.^[1] Created from the legacy of the Great Exhibition of 1851, and affectionately known as "Albertopolis", this cultural quarter was established by the Royal Commission for the Great Exhibition of 1851 for the purpose of "increasing the means of industrial education and extending the influence of science and art upon productive industry". Across its estate of 87 acres in South Kensington, the Royal Commission established three of the world's most popular museums: The Natural History Museum, Victoria and Albert Museum, Science Museum and three colleges dedicated to arts, science and design: Imperial College London, the Royal College of Music and Royal College of Art and the most famous concert venue in the world, the Grade I listed Royal Albert Hall which was created originally as the Central Hall of Arts and Sciences. Over past century and a half, these institutions have been joined by other organisations that share the mission of promoting innovation and learning through the arts and science, including the Goethe Institut, Royal Geographical Society, Institute Français and the Ismaili Centre. The Royal Commission continues to act as landlord for much of the original estate.

Delivering public benefit with global reach

Today, this cultural quarter is thriving and is a success story emulated around the world. Each of the institutions here are world leaders in their respective fields and together they attract over 20 million visits a year and thousands of students from all over the world. True to Prince Albert's founding vision, these are public institutions, open to all and providing public benefit not only to those who visit and study here, but through their research, partnerships and programmes delivering a social and economic impact that has

global reach. The diverse, dynamic and world-renowned activities of these organisations: which include training, outreach, research, teaching, performance, promotion, expertise, design and creation, writing, publishing, entertainment and exhibition underpin the special qualities of this cultural quarter. Innovation, learning and public engagement are as intrinsic to the heritage of this cultural quarter as the impressive architecture of the buildings in which these activities take place.

A Strategic Asset for London

London's cultural, creative and education sectors are central to the city's economic and cultural well-being and as world-renowned centres of excellence, the institutions in this cultural quarter play an extremely important part in London's status as a leading world city. The national and international significance of this area is recognised in the London Plan. Policy 4.5 focuses on London's Visitor Infrastructure and makes provision to "promote, enhance and protect the special characteristics of major clusters of visitor attractions" identified on map 4.2 of which the South Kensington Museum Complex / Royal Albert Hall is one. Policy 4.6 which identifies strategic support for the enhancement of arts, culture, sport and entertainment. It underlines the need to support the continued success of London's diverse range of arts and cultural enterprises and the benefits that they offer to its residents, workers and visitors and designates this cultural quarter as a Strategic Cultural Area (SCA). The new Draft London Plan also includes string support for culture.

Strategic Cultural Area straddles borough and Neighbourhood Area boundary

The cultural quarter created from the legacy of the Great Exhibition of 1851 today straddles a borough boundary, with the northern half in Westminster City Council and southern half in the Royal Borough of Kensington and Chelsea. This borough boundary has created administrative challenges over the years but the two local authorities have worked together to support and enhance a coherent cultural quarter and seamless experience for the millions that visit, as well as those that live, work and study here. This is most evident in the investment in the Exhibition Road public realm scheme that creates a unified surface stretching from South Kensington station to Hyde Park.

The coherence of the whole cultural quarter is recognised in the London Plan by the designation of the cultural quarter as a Strategic Cultural Area (SCA). The boundaries of the two halves of the SCA are defined in the Westminster City Plan and Royal Borough of Kensington & Chelsea Local Plan and are tightly drawn around the historic estate purchased by the Royal Commission for the Great Exhibition of 1851 to develop a cultural quarter. We welcome the recognition in the Knightsbridge Neighbourhood Plan of the importance of maintaining the coherence of the whole cultural quarter across the borough boundary but also the clear explanation that the Plan's policies only relate to the part of the Strategic Cultural Area that is within Westminster. We also welcome the effort the Forum has made effort to encourage institutions and residents in Royal Borough of Kensington and Chelsea, outside the boundary of the Neighbourhood Area, to give comments and ideas throughout the process of developing the Neighbourhood Plan.

Policy KBR1: Character, Design and Materials

We support the proposal that new development and redevelopment of existing buildings should demonstrate high quality, sustainable and inclusive design and respect the relevant Character Area or Conservation Area and welcome that this is not to be interpreted as discouraging original, innovative design and architecture. We note that the "Albertopolis" Character Area is tightly defined in the Policy Map (p77) as the mainly red-brick buildings around the Royal Albert Hall, within the Conservation Area and does not extend the whole cultural area colloquially known as Albertopolis, which extends from the Albert Memorial to the Victoria and Albert Museum. The Albertopolis Character Area includes some buildings, such as the School of Mines (now part of Imperial College London), which do not have a terracotta façade.

Policy KBR24: Residential Mix including to support local workers and students

The cultural, education and research institutions employ many thousands of people on a daily basis and are therefore recognised as important employment generating uses. Informal consultations with local employers have consistently identified the availability of affordable housing for those people who work here as a key issue which threatens to undermine the long-term operation and ongoing success of the institutions. This is a London-wide and complex issue, however with a high density of public sector organisations, charities, educational organisations and hospitality workers this a particularly acute issue for South Kensington. A recent report by Adzuna has found that average wages for jobs in South Kensington

are among the lowest in Central London.^[2] We therefore welcome the aspiration of the Neighbourhood Plan to encourage development that supports needs of local workers, alongside other housing priorities.

Policy KBR26: Existing and New Development within the Strategic Cultural Area

We welcome this policy that seeks to honour the original aims of the Royal Commission and support the cultural and educational identity of this cultural quarter and encourage institutions to thrive, whilst also recognising that the surrounding area has matured into an established and thriving residential area. In an increasingly competitive global environment, continued development, evolution, investment and innovation within each of the organisations is essential if the area is to maintain its identity as a leading centre of learning and innovation in the arts and sciences.

We welcome the support for ancillary development that is not in conflict with other policies within the Neighbourhood Plan. It is not uncommon, across the widest cross-section of publically funded bodies and institutions, for such bodies to explore ways in which income and revenues can be generated to support core services through the diversification of activities. Such moves can enrich and enliven the experience of visiting, working in or living within or nearby such activities. Taking opportunities to make major institutions more outward looking and welcoming can come hand-in-hand with making them more open and welcoming. Early consultation during the preparation of the Neighbourhood Plan identified an issue for local people being the relative dearth of amenities to support local day-to-day life within the Strategic Cultural Area. In view of the significant numbers of people living within the area and its immediate hinterland – be they permanent residents or students – ancillary retailing or other services which will be open to public use has the potential to meet what is considered locally to be a deficiency in provision. These uses should be ancillary to the main cultural or education use and should accord with other policies within the Development Plan.

We welcome the Plan's effort to balance the needs of everyone who uses the area including residents, workers, visitors and students. We note that the Neighbourhood Plan needs to be taken as a whole, with all 42 policies understood as working together. It is appropriate that within the 42 policies there are 2 specific policies that focus on the specific character and use of the Strategic Cultural Area. These policies are clearly set in the context of policies in the Plan protecting residential amenity, and seeking to reduce noise and nuisance.

KBR26 is in general conformity with the Westminster City Plan which recognises that the different parts of Knightsbridge have different functions and characteristics: one of international importance in terms of the arts, culture and education, and the other as an established residential neighbourhood. Westminster's policies seek to ensure that long-standing residential communities, outside of the Strategic Cultural Area, are not lost by encroachment of other uses. Policy S9 directs "new tourism, arts, cultural and educational uses and appropriate town centre uses to the Strategic Cultural Area". It indicates that new commercial uses will not generally be appropriate outside of the Strategic Cultural Area. Policy S22 confirms strategic support for existing tourist attractions and arts and cultural uses in the CAZ and Strategic Cultural Areas. Arts and cultural uses will only be acceptable outside of these core zones where they are of a local context and do not have an adverse impact on residential amenity. We welcome that the Neighbourhood Plan also recognises and supports the distinctive nature of the Strategic Cultural Area and its role with the Central Activities Zone, and that it has a character, purpose and needs that are distinct from the predominantly residential nature of other parts of the Neighbourhood area.

Policy KBR27: Public Realm in the Strategic Cultural Area

We welcome this policy, along with the other policies in the Plan encouraging public realm improvements. Improvements to the public realm around the Royal Albert Hall and Royal Albert Memorial are much needed and the *Re-Imagining Albertopolis* scheme has had strong support from the local community. We welcome the inclusion of this scheme in the list of priorities for use of Community Infrastructure Levy.

We welcome the policy that any temporary and pop-events that require planning permission should be appropriate to the SCA and the mission and activities of the cultural and educational institutions. This is important to maintain the distinct identity of the SCA. This policy reflects and is consistent with neighbouring RBKC's policy for events on Exhibition Road (Key Decision Report: Future Use of Exhibition Road, 2011). In line with this RBKC policy, the Exhibition Road Cultural Group convenes an advisory group bringing together institutions, residents and council officers to review proposals for events in Exhibition

Road. The advisory group seeks to encourage events which contribute to the mission of the cultural and educational organisations and to minimise any disruption to residents, local businesses and neighbouring institutions.

Part Two: Neighbourhood Management Plan

We note that the Neighbourhood Management Plan in appendix 2 does not relate to land use policy and therefore has no statutory basis, but understand that it reflects concerns raised by local at consultation events on the Plan. Its inclusion in the suite of documents accompanying the Plan demonstrates how the Knightsbridge Neighbourhood Forum has sought to engage with the local community and address their concerns and aspirations as broadly as possible. It raises a number of issues that are a helpful starting point for longer-term discussion about the management of the area with the relevant authorities and stakeholders.

We would be happy to provide any further information the Examiner may require and to give oral evidence.

Yours

Emily Candler

Emily Candler
Executive Director
Exhibition Road Cultural Group

APPENDIX

Organisations which come together to form the cultural quarter

(bold indicating the facility falls within the Knightsbridge Neighbourhood Plan area)

- **Royal Albert Hall**
- **Royal Commission for the Exhibition of 1851**
- **Imperial College London**
- **Royal College of Art**
- **Royal College of Music**
- **Royal Geographical Society (with IBG)**
- **Goethe-Institut**
- **Ognisko Polskie**
- Royal Parks: Hyde Park and Kensington Gardens
- Victoria and Albert Museum
- Science Museum
- Natural History Museum
- Institut Français
- Ismaili Centre
- Kensington Palace
- Serpentine Galleries
- South Kensington Estates/Cromwell Place Galleries

Summary of organisations within the cultural quarter

Royal Albert Hall

- The Royal Albert Hall was opened in 1871 by Queen Victoria.
- It is a Grade I list building and one of the world's leading concert venues.
- It is a key element in Prince Albert's so called 'Albertopolis' project conceived following the success of the Great Exhibition of 1851 in order to create a permanent series of facilities for the enlightenment of the public in the area.

- The Hall, with a capacity of 5,544 (reduced from the 8,000 originally envisaged in view of modern day safety standards), hosts around 400 events in the main hall each year with a similar number of smaller events in the Hall's other spaces.

Royal Commission for the Exhibition of 1851

- Established by Queen Victoria and led by the Queen's Consort Prince Albert in 1850 to organise the Great Exhibition of 1851.
- The Commission was made permanent immediately following the Exhibition at which time the commissioners purchased 87 acres of land over which the area's principal cultural, education and research venues were laid out.
- The Commission continues to act as landlord for much of this original estate.
- In the spirit of the Prince Albert's original vision for the area, the Commission is now a grant-making educational trust, providing funding for individuals, companies and organisations, particularly in scientific and technological disciplines with its headquarters accommodated within Imperial College.

Imperial College London

- Imperial College London was founded in 1907 when the Royal College of Science, the Royal School of Mines and the City and Guilds Technical College, which were already on site, merged to form The Imperial College of Science and Technology.
- Imperial College London is now established as one of the world's leading universities with an international reputation for excellence in teaching and research across its core science, engineering, medicine and business disciplines.
- Imperial College London is considered amongst the most innovative universities in Europe and is consistently ranked amongst the world's top ten and Europe's top five universities.
- Imperial is home to approximately 15,000 students and 8,000 staff across its sites and awards over 6,100 degrees each year.

Royal College of Art

- Founded in 1837 as the Government School of Design, the RCA has produced some of the UK's most influential artists and designers including David Hockney, James Dyson and Ridley Scott.
- The RCA was the top ranking Art and Design School globally in 2015 and 2016.
- The RCA has strong links with world-leading museums and galleries including a joint MA with the V&A.
- The only entirely post-graduate art and design university in the world, the College has nearly 1,500 students. College alumni also include the chief officers of major international companies including Burberry, VW, Samsung and Porsche.

Royal College of Music

- The Royal College of Music was founded in 1882 by the then Prince of Wales (later to become Edward VII). It is one of the world's great conservatoires, training gifted musicians from all over the world for international careers as performers, conductors and composers.
- Founded in 1882, the RCM has trained some of the most important figures in British and international music life, including composers such as Holst, Vaughan Williams, Turnage and Britten.
- In the 2016 QS World University Rankings, the RCM was named the top conservatoire for Performing Arts in the United Kingdom and was ranked joint third with the University of Oxford across all Performing Arts institutions worldwide.
- The College emerged from the original National Training School for Music which was part of Prince Albert's original post Great Exhibition vision for the area.

The Royal Geographic Society

- The Royal Geographic Society was founded in 1830 and moved into Lowther Lodge on Exhibition Road in 1913.
- Aims to promote geography as a subject and develop geographical knowledge.
- 200,000 members, students and visitors come to the building each year for talks, events and exhibitions.

Goethe-Institut

- UK centre of the Federal Republic of Germany's international cultural institute

- We promote the study of German abroad and encourage international cultural exchange. A German language and culture institute located along Exhibition Road.
- Offers German language courses to all ages, specialised courses are available for learning specialised skills.

Ognisko Polskie

- Ognisko Polskie - the Polish Hearth is one of London's oldest Polish Clubs which today hosts a variety of theatrical, musical and other cultural events.
- Founded in 1939 to maintain the cohesion of the free Polish community in the United Kingdom during the Second World War, it is a place where Polish culture, history and identity are explored and celebrated.

Emily Candler

Executive Director

Exhibition Road Cultural Group

Discover South Kensington – the home of science, arts and inspiration

www.discoversouthken.com

@southkensington

^[3] Future Use of Exhibition Road, Key Decision Report (2011), Royal Borough of Kensington and Chelsea.

^[1] A list of organisations indicating which are inside and outside the Neighbourhood Area is included as an appendix.

^[2] <https://www.adzuna.co.uk/blog/2017/12/12/tube-stop-salaries-which-stations-have-the-highest-paying-jobs/> and <http://www.dailymail.co.uk/news/article-5227297/Britains-richest-borough-lowest-wages-London.html>

From: Madeline Elsdon
Sent: 13 February 2018 22:55 Neighbourhood,
To: Planning: WCC Consultation on
Subject: Neighbourhood Plan

I am a resident, living in . I support most of the policies submitted in the Knightsbridge Neighbourhood Plan. The Brompton Road and Montpelier Street have become stress areas with the influx of middle eastern cafes, many serving shisha. A monoculture has taken over and the streets have become crowded and littered. This has had a negative impact on the residential environment and change of use should be restricted and consultation should take place.

I do not agree with the policy to make a 20 MPH speed limit. The traffic lights should be adjusted to allow traffic to move on freely. Pedicabs are unsuitable for London streets and should be banned. All traffic lights should have count down numbers for pedestrians giving adequate time for people to cross over three lanes of traffic in the Brompton Road.

The Hyde Park barracks are an integral part of Knightsbridge and should be retained. Any development on the adjacent land should be minimal.

Madeline Elsdon

**Response by Belgravia Neighbourhood Forum
to Westminster City Council's Consultation
regarding Knightsbridge Neighbourhood Plan**

1. Introduction

The Steering Group of the Belgravia Neighbourhood Forum (BNF) wishes to respond to Westminster City Council's consultation regarding the Knightsbridge Neighbourhood Plan (KNP).

We believe that the KNP is of particular relevance to the BNF since a number of the issues covered by it will also be relevant to the area covered by the BNF. We will therefore be paying close attention to the KNP, not least because both KNF and BNF have been designated by WCC as Residential Forums.

2. Comment

We wish to express our clear and strong support for the KNP, which appears to us to be a most thorough and well put together document. It covers a great deal of ground and highlights all the issues of importance in Knightsbridge and we consider that the policies which it is proposing are appropriate and suitable to deal with these issues. We also would support the proposed Neighbourhood Management Plan in Part Two.

3. Specific Policies

There are a number of policies proposed by the KNP which we particularly approve of because, since Knightsbridge borders directly on Belgravia, they will also be of relevance to Belgravia as well as Knightsbridge. For example, the KNP's view that tall buildings are not appropriate in Conservation Areas is relevant to Belgravia, not least because very tall buildings in Knightsbridge are likely to be visible in and impinge upon Belgravia also.

Another clear example would be the KNP's emphasis on healthy air and the reduction of air pollution which is also of great importance to Belgravia. Air pollution knows no boundaries and therefore any steps that are taken to reduce air pollution in Knightsbridge are likely to also help to improve air quality in Belgravia. We would therefore very much support the KNP's comments about promoting electric vehicles and in particular the installation of the necessary infrastructure for electric vehicles, notably charging points.

Again, since Knightsbridge and Belgravia abut on each other and are in many ways one area (as is reflected by the fact that they are both in the same Westminster Council ward), we share and support the KNP's desire that the character of Conservation Areas should be respected, and architectural heritage preserved. Since Knightsbridge and Belgravia can in many ways be regarded as a continuum, it is as important to us that the character of Knightsbridge should be retained and enhanced as it is in the case of Belgravia. In both cases, it is very important that the residential character of these areas is preserved and that they are not subjected to overdevelopment and over-commercialisation with all the noise and stress that these will bring to what are essentially residential areas.

4. Conclusion

In summary, we can say that we feel we have a good understanding of the issues and problems affecting Knightsbridge since we share many of them ourselves. Against this background, we are happy to give our unequivocal support to the KNP and the policies it proposes.

Jeremy C.B.Lucas
Treasurer

For and on behalf of the
Belgravia Neighbourhood Forum

12th February 2018

From: Dyment, Peter
Sent: 14 February 2018 09:07
To: Neighbourhood, Planning: WCC
Subject: Westminster's Regulation 16 Consultation - Proposals concerning Building Indoor Air Quality
Attachments: KBR 35 Healthy Air Policy Comments 0218.docx

Dear Sirs

The opportunity to draw attention to the need for regulation concerning Indoor Air Quality is welcome and timely.

The development of this regulation is necessary for the protection and well-being of people who live and work in UK cities.

We typically spend about 90% of our time inside buildings in cities.

People in our large UK cities such as London are already exposed to the toxic hazard of traffic air pollution. What is less well known is that outside air pollution can penetrate into buildings through doors, windows and ventilation systems.

It will take many years to reduce outdoor air pollution at source. (Fine combustion particles PM1 and NO2)

Last week a new British Standard was published in the UK. BS EN 16798-3:2017. This standard replaces BS EN 13779:2007.

This new standard gives an easy reference table to link WHO maximum pollution exposure levels to indoor and outdoor pollution levels.

From this table is easy to calculate the required minimum air filtration efficiency for ventilation filters to deliver clean air into buildings.

There are also much more accurate recent ISO filter test standards to ensure close to real life filter performance for particles and gases.

For the first time it is now possible to offer guidance by referencing these standards. BS CEN ISO 16890:2016 and BS CEN ISO 10121-2:2013.

For many years I have been involved with other experts developing these standards. Now is the time they should be used to

protect the health of the public at large in polluted cities. I have attached some additional notes for reference.

I fully support this new proposed regulation as does my company.

If any further referencing or details are required please do make contact.

Many thanks

yours faithfully

Peter Dyment

Technical Manager
Camfil Ltd.

Outside air pollution is already a current and severe problem in Knightsbridge as it is in many other central areas of London.

Identifying the outside air polluting contaminants that can damage health is important.

These are principally fine combustion particles known as **PM1**, PM2.5 and PM10. The most damaging is PM1 which is airborne particulate matter 1 micron and below in size. These particles can penetrate into the human body through the lungs and into the bloodstream more effectively than larger particles. **PM1** are toxic when sourced from traffic and the World Health Organisation has labelled traffic emission diesel particles a group 1 carcinogen. The most dangerous health damaging class, to which there is no safe level of exposure.

Apart from particles there are also toxic gases from traffic air pollution. **NO2 nitrogen dioxide** has been identified as an equally health damaging pollutant. The Royal College of Physicians report in 2016 Every breath we take gives details of the negative health effects.

The source of health damaging outdoor source air pollution is principally city traffic but there are also significant contributions from residential boilers and heating systems, power stations, incineration plants and other transport systems such as trains, planes and ships.

Any effective measures that can be applied to reduce air pollution at source will take time because of time taken to debate policy, political inertia and the cost to implement issue.

New low-cost air monitoring capability is now becoming available to the public and environmentally concerned bodies. Increasingly the devices being developed have the capability to log data, use alarms and with set limits can control air cleaning plant in buildings.

Public concern is increasingly being expressed through traditional mainstream media and digital forums. It is important properly tested solutions are provided.

Strategies and Solutions must be provided to protect Public Health in the Short Term. We typically all spend about 90% of our time inside the buildings where we live and work.

Making our Buildings safe havens against air pollution is a strategy that can work. Outside air pollution in the form of fine particles and gases can penetrate into buildings. This level of penetration into buildings when measuring typically falls in the range of 30% to 70%. Penetration depends on factors such as age and air leakage of building envelope. Number of people entering and leaving the building, Windows being open or closed.

Solutions using air cleaning in ventilation systems with air filtration or standalone air purification units. Both solutions that when correctly applied can be very effective.

Recent publication of new technical standards through BSI, CEN and ISO make selection of effective minimal cost air cleaning possible. The standards are BS CEN ISO 16890:2016 performance testing for particle filters, BS CEN ISO 10121-2:2013 performance testing for molecular gas filtration, Eurovent energy rating for filters. Select A or A+ for good performance. BS CEN 16798-3:2017 enables selection of air filters for clean healthy indoor air quality.

Fine Particle and Gas removal efficiency for supply air filter systems.

BS EN ISO 16890:2016 gives the particle removal efficiency of the filter rated to PM1 for the best performing filters. PM1 is the most penetrating and health damaging range of particles and is found in traffic emissions. Each filter product is tested for its efficiency. A well performing filter will have an 85% removal efficiency and is denoted by ePM1 85%, where 'e' stands for filtration

efficiency. A similar well performing filter removal efficiency can be achieved under BS CEN ISO 10121-2:2013 for removal of nitrogen dioxide (NO₂) of at least 85%.

There are new guidance documents titled as standards covering building indoor air quality and air filtration coming from the USA in recent years. Principally Well Building and LEED. While these are not national technical standards bodies such as **BSI, CEN** and **ISO** they do reference many good sources and much of the guidance is sound but should be cross referenced and updated from national technical standards sources. Some of the good points made are that space should be allowed in new build project AHU's for molecular filtration and particle filters with high removal efficiency should be used on building supply air systems.

Supply Air systems should bring clean filtered outside air into the building. Recirculation air also needs to be cleaned as it contains indoor sourced contaminants, usually larger bioparticles and molecular gas contaminants such as VOC's and formaldehyde. Odours can also sometimes be a problem.

Recirculation air can be cleaned by a standalone air purifier where there is no ducted recirculation air system. There are various configurations of molecular gas filter that can be applied depending on the contaminants of concern. An air filtration system with little or no ducting can be very energy efficient.

Ambient outside air pollution levels at location of the building should be recorded or gathered by whatever means possible so that air pollutant concentration levels can be determined. The variation in concentration and levels will determine the filtration efficiency and capacity that is required.

An On-site Assessment of the building is key to optimise existing air plant and apply the most effective clean air solutions in other areas not properly serviced. The chances are that several measures will need to be applied to result in the best overall solution.

Servicing of air filters and monitoring of clean air quality in the building is important to establish that healthy levels of clean air are delivered to building occupants. Proper records should be maintained for external regular inspection.



Sent by email to:

neighbourhoodplanning@westminster.gov.uk



14 February 2018

Knightsbridge Neighbourhood Plan Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water Utilities (Thames Water) regarding the above. Thames Water are the statutory water and sewerage undertaker for the area and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012.

We have the following comments on the Neighbourhood Plan consultation:

General Comments

The Thames Water seeks to work closely with the local authorities to plan for the necessary water and sewerage/wastewater infrastructure to service development in its area in accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

Impact on Infrastructure

Policy KBR25 relates to the reconfiguration of existing residential buildings and supports such proposals where they would result in an increase in the number of dwellings. Such an approach can result in an increase in the foul flows to the sewerage network and Thames Water would advise that such proposals should be accompanied by the retrofitting of sustainable drainage measures to the property in order to ensure that there is a net reduction in peak flows to the sewerage network.

Developers are advised to contact Thames Water at an early stage to discuss water and sewerage infrastructure requirements.

Information for developers on water/wastewater infrastructure can be found on Thames Water’s website at: <http://www.thameswater.co.uk/developers/1319.htm>. Contact can be made with Thames Water Developer Services by:

I trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours sincerely

Richard Hill
Head of Property

From: Francesco Brenta
14 February 2018 10:37
Sent: Neighbourhood, Planning: WCC
To: Simon Birkett;
Cc: Re: Knightsbridge Neighbourhood Plan
Subject:

Dear Sirs,

I write to express my full support of the Knightsbridge Neighbourhood Plan: I particularly support its policies on the Hyde Park Barracks to protect the north view from Montpelier Street by reducing the height of any future development so that its not impacting the Knightsbridge conversation area, an intact streetscape of late Georgian and early Victorian terraced houses.

Furthermore I fully support a new Neighbourhood Stress Area: indeed the corner of Montpelier street and Brompton road has seen an overcrowding of seasonal tourists which has resulted in illegal pedicabs, loitering, noise, rubbish and litter and the reduction of local shops catering for local residents which are gradually be pushed-out by a string of identical looking cafes and shisha bars.

Finally I believe more can be done in terms of healthy air to better comply with World Health Organisation guidelines: indeed we should do more to reduce traffic and support the full pedestrianisation of Exhibition road, Beauchamp place, and limit traffic to residents only in the Montpeliers and Trevors as proposed in a referendum a few years ago.

Best wishes, Francesco Brenta

Orproject

www.orproject.com

From: Claire McLean
Sent: 14 February 2018 11:18
To: Neighbourhood, Planning: WCC
Subject: RE: Knightsbridge Neighbourhood Plan - Regulation 16 Consultation

Dear Neighbourhood Planning Team,

Thank you for this consultation. I can confirm that the Canal & River Trust have no land or waterspace in the Neighbourhood Plan area, and therefore have no comments to make.

Kind regards,

Claire McLean MRTPI | Area Planner | London
Canal & River Trust

Living waterways transform places and enrich lives



Neighbourhoodplanning@westminster.gov.uk

13th February, 2018

Dear Sir

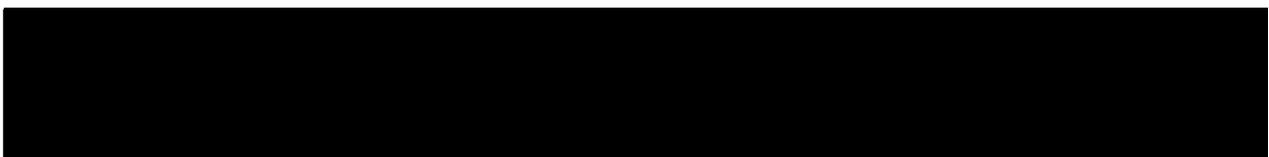
I write on behalf of The Knightsbridge Association. Founded in 1961 it is the local amenity society for the area and is recognised by the City of Westminster and the Royal Borough of Kensington and Chelsea as the consultative body for the area. It has a membership of around 950.

We support both the proposed Knightsbridge Neighbourhood Plan (KNP) and the Knightsbridge Neighbourhood Management Plan (KNMP).

The Plans have been produced by fully engaging with residents, businesses, institutions and Amenity Societies from within and bordering the Forum's registered area. We support the Plan as it recognises the problems that affect Knightsbridge and sets out to tackle them. While we don't feel the necessity to comment on the every policy in detail, we highlight a few that our members are particularly keen to support.

KBR7 Tall Buildings. We are in complete agreement with para A. as Knightsbridge is not an appropriate location for tall buildings. This policy has relevance to:

KBR14. The Hyde Park Barracks Land. We would like to see the retention of the Barracks in whole or in part as it has a long historic association with Knightsbridge. Without controls the site might become just one or more tall blocks of high value under occupied apartments.



Knightsbridge differs from other areas, as it is a recognised international shopping centre with a large influx of visitors, which has to be managed.

KBR15. Neighbourhood Stress Area deals with this comprehensively.

KBR24. Residential Mix. This section seeks to ensure that a balance of accommodation is maintained and enhanced.

KBR35. Healthy Air. At our recent AGM one of the top concerns raised by members was pollution and air quality, so we welcome this policy.

KBR 23 Construction Activity. This has particular relevance to our members, as it is important to manage construction activity since poor control badly affects people living and working in the area.

We support the list of principals and projects to be funded by the Community Infrastructure Levy (CIL) and other developer monies (page 78).

The KNMP, which addresses the matters that aren't in the KNP, such as licensing and street cleansing, but are vital to the benefit of the area, is also welcomed by the Association.

Yours faithfully,

Edward Davies-Gilbert.

Chairman, Planning and Conservation Committee.



KNP81

15 February 2018

Dear Sir/Madam,

I am writing in response to the Knightsbridge Neighbourhood Plan consultation. The Environmental Industries Commission is the leading UK trade body for the environmental services and technologies sector. Our membership covers a broad scope of environmental issues, from air quality, to energy efficiency, to water management. We are particularly active in London, having worked closely with the GLA on the implementation of the original London Emission Zone and the current Ultra Low Emission Zone.

We are pleased to see the focus on sustainability and environmental protection in the Knightsbridge Neighbourhood Plan. We would like to offer our support to the ambition and scope of the Plan and we hope that Westminster Council follows through in implementing this plan. As a historic, famous area of London we would like to see Knightsbridge, and the City of Westminster in general, provide an example to other local authorities in setting out an ambitious local plan with strong sustainability credentials.

We support the Neighbourhood Plan's recognition that the maximisation of energy efficiency in buildings is essential to combating climate change. As the Committee on Climate Change has shown, on a national level improving energy efficiency of our buildings is a crucial part of the carbon reductions needed to meet our legally binding carbon budgets on the way to meet the target of a 80% reduction in carbon emissions by 2050 on 1990 levels.

The Plan's targets for air quality are particularly commendable, especially considering that Knightsbridge is a heavily polluted area of the city, and often greatly exceeds the legal limits of NO₂ and other harmful emissions.

On the NRMM section in Appendix C, we broadly support the Plan's focus on this oft-neglected but highly important aspect of air pollution. We would add however, that our membership strongly advocates that the GLA's standards for NRMM are not ambitious enough, they are equivalent to current Euro 3 standards for NO_x emissions, and are far weaker than the Euro 2 standards for particulate matter. Hence we would urge local authorities in London to aim not only to meet GLA NRMM standards, but look to exceed them.



We would add a further point that was not raised in the Neighbourhood Plan. This refers to the toxic emissions produced by Transport Refrigeration Units (TRUS), for instance those used by supermarket delivery vans. These units exploit a loophole in regulations meaning they are not subject to normal vehicle emission standards, leading to the use of highly polluting red diesel. There are zero-emission alternatives currently available. We would urge that the Knightsbridge and the City of Westminster as a whole should make sure that TRUs are covered in air quality plans.

In general, we strongly support the Knightsbridge Neighbourhood Plan and its commendable environmental credentials. We hope that Westminster City Council, working with its neighbourhoods can be a national leader in sustainable local governance.

Yours sincerely,

Matthew Farrow
Executive Director



Knightsbridge Neighbourhood Plan 2017 – 2037

Part One: Knightsbridge Neighbourhood Plan

The Licensed Taxi Drivers Association (LTDA) has served as the professional and authoritative voice of London's taxi drivers for over 50 years. We are committed to ensuring that our members' voices are heard, protecting the interests of the taxi trade and maintaining the high professional standards of the industry.

Knightsbridge is an area of strategic significance in London, being a key shopping area and tourist destination, attracting large numbers of visitors every day. The LTDA supports proposals made in both the 'Knightsbridge Neighbourhood Plan' and the 'Neighbourhood Management Plan'. We particularly welcome the importance the Plan places on tackling air quality and the commitments made to future proof a sustainable transport network.

Knightsbridge's public spaces and utilities

Policy KBR30: Assessing significant transport impacts of development proposals

The LTDA welcomes the policy that a detailed transport assessment must be carried out on all development proposals that are likely to have significant transport impacts. The Plan was right to first mention air quality as a key consideration in any future proposals. We were also pleased to see that disabled access would have to be given consideration.

Taxis provide a crucial lifeline for many individuals with restricted mobility, as the only form of fully accessible public transport on London's roads. The unique door-to-door service provided by taxis is of particular importance to disabled passengers. Therefore it is important that taxi drivers are consulted during the planning process of any development proposals.

Policy KBR32: Electric vehicle infrastructure

The LTDA strongly supports the objective of ensuring that electric charging infrastructure is future proofed. This will be crucial in reducing emissions from transport, being one of the biggest contributors to poor air quality in London.

In particular we welcome the proposal that all Level 1-3 developments should contribute towards the installation of future proofed rapid electric charging points at locations suitable for taxis. Since 1st January this year, all new black cabs licensed in London are required by TfL be zero emissions capable (ZEC). London's taxi drivers require rapid charging infrastructure that is accessible, widespread and affordable. For every minute a taxi driver is off the road, they are losing potential income. Westminster City Council must ensure that dedicated, affordable and easily accessible charge points are available for taxi drivers in Knightsbridge. This will be important in encouraging drivers to switch to the new ZEC cab.

Policy KBR33: Public transport

In order to clean up the air in Knightsbridge, it is essential that active and public modes of transport are encouraged over private car use. Taxis are an essential part of the public

transport mix, especially for those with mobility issues. Although other forms of public transport may be able to provide accessible journey options, taxis are the only form of public transport that can take passengers directly to their destination, rather than near to their destination as is often the case with buses and trains.

We support this policy to encourage proposals that improve the efficiency of mass transit systems, including improving access to tube stations. The council should support measures to guarantee taxi access to Knightsbridge and South Kensington stations through the introduction of further taxi ranks and drop-off points. The ready availability of taxis around stations would allow visitors to be transported conveniently and safely to their desired destinations. This service is particularly important for those with accessibility issues.

Knightsbridge's environment and people

Policy KBR35: Healthy air

We welcome the objective of ensuring healthy air which is fit to breathe. One of the worst places to breathe in London's polluted air is stuck in traffic, behind the wheel of a cab. The taxi trade is doing its bit to reduce emissions; however we are concerned about the negative impact that rapidly rising numbers of private hire vehicles (PHVs) are having on our air.

Over the past few years the number of PHVs operating in areas such as Knightsbridge has dramatically increased, having a negative impact on congestion and the associated rising levels of air pollution. PHVs should be encouraged to make the same commitment to transitioning to ZEC vehicles as black cabs have. Currently PHVs are not required to be ZEC until 2023.

Policy KBR42: Sustainable development and involving people

The plan recognised that sustainable development and environmental protection is achieved when people are fully engaged in policies and decision making affecting the environment. We support the proposal that developers should be encouraged to consult with the local affected community. This should include local residents and local businesses and trades with the relevant expertise. In the case of taxis, the trade should be consulted on access to taxi ranks and the rapid charging infrastructure needed to support local drivers.

Part Two: Neighbourhood Management Plan

Knightsbridge's public spaces and utilities

Action 66: Implement 'rapid' 30 minute electric charging for taxis.

The LTDA wholly supports the action for Westminster City Council to implement rapid electric charging for taxis by 2018. This is particularly important given that the new ZEC cab is already on the streets and is now the only new cab available to buy in London that meets



TfL's requirements. Delivering a network of accessible and fairly priced rapid chargers will be crucial in encouraging drivers to switch to the ZEC model.

TfL originally committed to install 75 rapid chargepoints in London by the end of 2017 but this target was missed. TfL now expects more than 100 taxi-only rapid charge points to be in operation by March, and 150 by the end of the year. Whilst more and more of such points are popping up all over London we welcome any efforts in this Plan to help meet these targets.

From: Maggie Baldwin
Sent: 14 February 2018 12:58
To: Neighbourhood, Planning: WCC KNIGHTSBRIDGE
Subject: NEIGHBOURHOOD FORUM

Dear Sirs

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

Yours sincerely
Margaret Baldwin [Mrs]

From: Jeremy Lacey
Sent: 14 February 2018 13:17
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

Dear Sirs,

I am writing in support of the Knightsbridge Neighbourhood Plan. Chelsfield is an active developer, involved in a number of high profile schemes in London, notably, the K1 development which is bounded by Sloane Street, Brompton Road, Hooper's Court and Basil Street. Although this development forms part of the Royal Borough of Kensington & Chelsea, as opposed to Westminster, it is located on the boundary between the two Boroughs and is central to Knightsbridge. The efforts made within the Plan to develop the planning policy and influence the management of the neighbourhood is likely to have a positive impact on one of the most iconic locations both nationally and globally and is welcomed. Specific comments on a selection of policies are considered below:

Policy KBR2 - Commercial Frontages, Signage & Lighting

The use of high quality signage is supported and will enhance the special character of Knightsbridge. It is important that any such proposals respect the original architectural detail and bring a uniformity and cohesiveness to retail parades, especially within the International Centre which attracts tourists from around the world.

Policy KBR41- Healthy People

Good urban development can provide health benefits. This was an important consideration during the detailed design stage of our development in Knightsbridge, especially in relation to the residential element (35 apartments). We have worked hard to create a noise oasis by way of a secluded courtyard in the middle of a very built up environment. We have also looked to improve public realm generally which will also contribute to people's wellbeing, especially in high density urban areas such as Knightsbridge.

Policy KBR8 – Pedestrian Movement along, across and adjacent to main roads.

This policy is particularly welcome. It is extremely important that, where possible, development proposals seek to improve pedestrian movement along main roads in Knightsbridge. This is something that Chelsfield have been actively promoting, having already extended the pavement width between Hooper's Court and Harrods. As part of the K1 development, the pavement adjacent to the development will also be widened providing an enhanced pedestrian experience, and importantly, providing a better landing area outside the proposed new tube entrance.

Policy KBR 10 – Roofscapes and Balconies

With reference to new developments, this policy states that, where possible, plant should be located within basement, or concealed within the roof area. Generally, plant is best located on the roof of developments, as opposed to deep basements. Whilst it is noted that plant should not have a detrimental impact on the roofscape which contributes to the character of the neighbourhood, care needs to be taken

in relation to the design of any screening as this can result in the plant becoming less efficient and having to work harder to perform its function which can affect the energy profile of the building. T

Policy KBR – KBR37 Retrofitting historic buildings for energy efficiency

The sensitive retrofitting of the energy efficiency measures in historic buildings is supported. From a Developers perspective, there are often conflicts between the requirements to preserve and enhance the heritage value of a building (particularly if Listed) and complying with planning conditions to improve the overall energy efficiency. In terms of residential development, the benchmark is generally to comply with the Code for sustainable homes level 4 (equivalent). Notably, we have experienced conflicts between acoustic requirements and energy efficiency. For example, to meet acoustic performance, it is often necessary to have secondary glazing, or worse still even fixed panes. This can result in the need for increased mechanical ventilation which has an impact on the energy profile of the building. Unless there is close collaboration between the LPA and the developer to ensure an optimised solution is achieved, there may be opportunities wasted to improve the energy profile of heritage assets and create better quality, more sustainable apartments.

This plan is well considered and has been subject to extensive consultation with stakeholders and residents. On balance, we are generally supportive of the policies and, if adopted, believe they will go a long way to achieving the forum’s vision and values for Knightsbridge to become the best place to live, work study and visit. The policies and the management actions are reflective of the desire to preserve or improve the character and appearance of Knightsbridge and this is welcomed.

Yours sincerely

Jeremy

Jeremy Lacey

Chelsfield UNITED KINGDOM

From: Andrew Taylor
Sent: 14 February 2018 13:18
To: Neighbourhood, Planning: WCC
Cc: Rebecca Aiken
Subject: Knightsbridge Neighbourhood Plan - Consultation

Dear Sir / Madam,

With respect to the Knightsbridge Neighbourhood Plan, I am pleased to confirm broad support of the Plan's vision, values and objectives.

Please inform me of any public hearing that may be convened and notify me of the Council's final decision.

Thank you.

Kind Regards,

Andrew Taylor, *Owner's Representative and Project Director*
Peninsula London Hotel Management Services Limited



From: Ray Dyer
Sent: 14 February 2018 13:33
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

I agree with most of it but feel I must point out that Montpelier Street has been made a dumping ground for anything not wanted elsewhere. It is primarily a residential street and should remain so. But it has Rubbish piled up on the corner with Brompton Road continuously, we have a Boris Bike station, a Taxi Rank, a Motorbike Bay and now a Flower Stall which residents objected to but it made no difference. We have had for many years a very respected Italian restaurant, The Montpeliano, where they hose down the street daily and there has been no trouble with rubbish disposal and it has always made an effort to be part of the community but now there are two cafes, one of which is not a problem but the other contravenes all aspects of its licence but it is still open till very late and smoking Shesha pipes inside and then there is the Fish and Chip shop on the other side of the road that is hardly in keeping with Knightsbridge. Please could the licensing people consider the type of licence issued before there is trouble not afterwards and please could we return Montpelier Street to its former glory.

I am sure you will do everything you can to preserve Knightsbridge, I agree with your remarks about the Barracks

Ray C Dyer



Knightsbridge Neighbourhood Plan consultation Natural History Museum response

February 2017

1. Introduction

The Natural History Museum welcomes the opportunity to respond to the consultation on the draft Knightsbridge Neighbourhood Plan.

Although the Museum falls geographically outside the boundaries of the Neighbourhood Area to which the Plan applies, we are closely connected to our surrounding communities and are impacted by a number of the draft proposals.

Our comments in this response focus predominantly on Policies KBR26 and KBR27, relating to the Strategic Cultural Area (SCA), given their relevance to the Museum and its activities.

We would in particular like to note our appreciation for the efforts of the Knightsbridge Neighbourhood Forum (KNF) to consult organisations, residents and people working in the area adjacent to the 'Neighbourhood Area' throughout the development of this draft Plan. The special character of the area surrounding Knightsbridge and South Kensington is not restricted to set boundaries. The collaborative approach of KNF in bringing together residents, institutions and businesses from across Westminster City Council and the Royal Borough of Kensington and Chelsea (RBKC) has been welcome and reflective of the shared character of the area.

We offer this submission as an independent, and supplementary, response to that of the Exhibition Road Cultural Group, of which the Museum is a member.

2. About the Museum

The Natural History Museum (the Museum) welcomes more than 4.5 million visitors each year who come to enjoy our galleries, events, educational activities and to see our scientists in action. We are the UK's top science attraction and the fourth most visited overall.

We are a world-leading science research centre. Through our collection of more than 80 million natural science specimens, which underpins everything we do, and our 350 scientists, whose expertise spans climate change to neglected tropical disease, the Museum leads pioneering research programmes to address global scientific challenges. We work in partnership – nationally and internationally – to help unlock answers to the big issues facing humanity and the planet.

3. Contributions of culture, education and research

Knightsbridge and its surrounding areas are home to many world-leading cultural, education and research institutions, united in their purpose to promote innovation and learning through the arts and science. The Natural History Museum is proud of our place within this thriving and unrivalled cultural quarter. The unique combination of iconic institutions and the communities of residents, visitors and workers in this area ensure a nationally and globally renowned cultural offer, that's firmly grounded in its responsibilities and shared history with the local community.

We welcome the recognition within the draft Plan of the value of this unique combination to the surrounding area, in particular the acknowledgement that: *“The existing cultural, education and research uses within the Strategic Cultural Area (SCA) are the primary elements which combine to create the Area’s special character”*.

It is particularly welcome that the Plan acknowledges that the contribution of such institutions to the area goes beyond physical presence within the townscape and is rooted in the “uses and activities” of people working in, teaching in, learning in and visiting the area. Innovation, learning and public engagement are as intrinsic to the heritage of this cultural quarter as the impressive architecture of the buildings in which these activities take place. The role played in the area by staff, students, visitors and residents to encourage and sustain an atmosphere of shared culture and learning is critical to the special character that this area enjoys.

We also share the Plan’s reflection that this cultural quarter is a strategic asset for London and, indeed, the UK more widely. It is central to the country’s international reputation in science and the arts, and the economic contribution linked to the millions of annual visitors from across the city, the country and beyond.

The Museum supports the vision within the draft Plan that protection of the area’s unique cultural, educational and research-based heritage should continue to be a primary consideration of future development in the area. We strongly support the inclusion in the draft Plan of two specific policies that focus upon the Strategic Cultural Area, which complement and cohere with its wider tranche of policies for the wider Neighbourhood area: KBR26 and KBR27

4. Coherence of the Strategic Cultural Area

The Strategic Cultural Area crosses boundaries, with a northern portion in Westminster City Council and a southern portion in the Royal Borough of Kensington and Chelsea. Despite this boundary, it is important that the cultural quarter remains a coherent area for residents, visitors and institutions. The two local authorities that share this responsibility have worked together to support such coherence.

It is therefore welcome that the draft Plan similarly recognises the importance of maintaining coherence, whilst acknowledging that its proposals only relate to the northern portion of the SCA, which lies within the Neighbourhood Area. This is particularly extant in the place given within the draft Plan to the conservation and promotion of the ambitions of the Great Exhibition of 1851, and the Commission. We support the policy to honour the Commission’s original aims within the northern part of the SCA, as a means to preserve and promote the cultural and educational identity of this cultural quarter. We are also satisfied that the policies to protect and support thriving cultural and educational organisations in the northern half of the SCA are in line with RBKC policies for the southern half of the SCA.

As such, we believe that policy KBR26 finds an important balance between allowing innovation and development within an area that must inevitably continue to evolve to enhance its reputation as a leading centre of learning, arts and science, and that is an established residential neighbourhood.

Similarly, we support the consideration that KNF have given to the overall coherence of the area in requiring temporary and pop-up events to cohere with the SCA’s purpose, as per policy KBR27. This is important to maintain the distinct identity of the SCA, and reflects neighbouring RBKC’s policy for events on Exhibition Road. As exists within the process for such events in RBKC, it will be important to ensure a coherent process to review proposals for events in Exhibition Road that promote the SCA’s purpose and minimise disruption to residents, local businesses and institutions.

5. Balancing the neighbourhood's needs

Policies KBR26 and KBR27 both acknowledge and balance the needs of the Neighbourhood Area and surrounding areas in a considerate and important way. As has been noted throughout the response, the strength of this area lies in the diversity of people, communities and institutions it comprises. These policies therefore identify opportunities to support development along principles that will bring shared benefit to the area and the residents, workers, students, visitors and institutions within it.

Within KBR27, there is recognition of the importance of public realm improvements and progressing associated development of 'Albertopolis'. The policy specifically focuses on public realm improvement of the SCA that is within the KNP's remit, in the vicinity of the Royal Albert Hall. The Museum welcomes this policy and, in particular, we broadly support the principles for public realm improvements that underpin it: "enhancing" the operations and "physical links" between institutions in the area; "foster[ing] more collaborative forms of working", and "improv[ing] access to the area's venues for visitors, employees and residents".

The Museum shares these principles. The Museum is embarking upon a transformation of its outside spaces, including plans to better connect our Grounds with the wider urban realm of Exhibition Road. Driven by the Museum's mission to connect and engage people through science and nature, this major development of our Grounds shares principles of improving accessibility, fostering collaboration, enhancing the public realm and creating physical links across the area. Our plans to achieve this include creating a more porous welcome to the Museum and an inviting civic space, and promoting a biodiversity-rich space within a highly urbanised environment. The currently crowded streetscape will become a beautiful introduction to the Exhibition Road cultural quarter, with improved integration of the Museum's grounds with the public realm becoming a focal point in which visitors and residents can enjoy the spectacular surroundings.

Policy KBR26 also provides support for ancillary development that would specifically "help to broaden the appeal and promote the remits of the cultural, education and research organisations", and where "they do not adversely impact on the special character of the area". The Museum supports this as a policy that will enable the range of cultural, educational and research organisations that fall within the SCA in the Neighbourhood Area to explore opportunities to generate income and revenues, diversify their activities, and innovate the ways in which they make the space around them more welcoming and open for residents, visitors and staff. This policy also provides opportunity for such institutions to further support day-to-day life in the area through, for example, diversification of amenities. Such developments, of course, should clearly be ancillary to the main cultural, educational or research use of institutions in the area and complement wider policies relevant to Knightsbridge, to Westminster and RBKC, and to London.

The Museum supports the opportunities that such policies offer for the area to develop and innovate to meet the diverse needs of residents, visitors, students, staff and institutions. We welcome the Plan's consideration of balancing the needs of everyone using the area.

For further information, please contact: **Alexander Lee**, Government Relations Manager



Knightsbridge Neighbourhood Plan - Submission (Regulation 16) Consultation

Submission 14/02/18

Cundall is an international multidisciplinary engineering consultancy operating in 21 countries around the world. We have been established in London for over 35 years and deliver building design for a wide range of public and private clients. Cundall supports the proposals in the Knightsbridge Neighbourhood Plan.

In particular we commend:

Page 60 / KBR 32 . This encourages the development of infrastructure for electric vehicles and Clause E highlights a serious issue of reinforcing electrical infrastructure to support the provision of rapid charging stations which will place a heavy demand on existing capacity.

Page 65 / KBR 35. Air quality is a serious issue across London and this policy is focused on improving air quality not just limiting harm. In particular it references WHO guidelines which are specifically focused on preventing damage to health and are more demanding than UK minimum standards. Furthermore, there is an emphasis on delivering low concentrations of harmful particulates inside buildings which generally have been largely ignored. Finally it very sensibly highlights the need to check the air quality associated with external drinking and dining establishments.

Page 68 / KBR 36. The importance of renewable and low carbon systems is raised in this policy. In particular the issue of optimum efficiency is raised in relation to the correct operation of heating and cooling systems. It also encourages the consideration of battery storage which will be essential for the simultaneous charging of electric cars.

A significant improvement over the current London Plan is the requirement to use CIBSE TM54 methodology to assess carbon emission as opposed to Part L NCM. The latter bears little relationship to reality as it ignores energy use in evening time and weekends as well as many energy uses within the building such as lifts, external lighting and security. This was widely misconstrued as a performance gap when in fact the calculations were never intended to be used to predict energy consumption.

Page 74 / KBR 41. The emphasis on public health is welcome. Acoustics and noise has a significant impact on peoples health and well being in built up environments. The focus on achieving full scoring in BREEAM on air quality and energy is welcomed with the caveat that the current BREEAM considers Part L calculations and it will be the next revision that will start to address actual energy consumption.

14 February 2018

Gary Lloyd MRICS MSc BA (Hons)
Head of Property

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

Knightsbridge Neighbourhood Plan 2017-2037 Submission Version

Thank you for the opportunity to comment on the submission of the Knightsbridge Neighbourhood Plan (KNP) in line with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

As an interested stakeholder, Imperial College London generally supports the objectives of the Knightsbridge Neighbourhood Plan. Imperial College London is a major landowner within and adjoining the neighbourhood area, and has a keen interest in the planning and development of the area covered by the Knightsbridge Neighbourhood Plan.

The Exhibition Road Cultural Group (ERCG), of which Imperial College London is a member and contributor, is making a detailed response to the Regulation 16 Consultation. Imperial College London wishes to unilaterally add the following:

Policy KBR7

Part B of Policy KBR7 states:

“B. 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:

- 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 Green or Royal Parks Conservation Areas;

d. significant or important views, both strategic and local, including townscape views and historic skyline features;

e. the view north along Montpelier Street (identified in Policy KBR5); or

f. the setting or openness of open spaces including Local Green Spaces or Metropolitan Open Land.”

ICL welcomes the inclusion of parts a) to f) in this policy, against which the impact of tall building proposals will be assessed.

However, while it is considered reasonable to protect the historic environment, it is not considered appropriate that this should be used to limit the aims of delivering sustainable development. Instead Westminster City Council and this policy should optimise the development potential of previously developed land, while balancing the benefits of development against potential harm. It is suggested that tall buildings that contribute positively to the character and distinctiveness, and take opportunities to enhance the character and appearance of the Conservation Area and its setting, should be permitted.

Taking the above issues into account, Imperial College London seeks to ensure that policy is effective and consistent with regional (GLA) and local (Westminster) policy, and that it does not unnecessarily restrict development (i.e. tall buildings), where it may otherwise be appropriate subject to meeting specified criteria, high quality design and the benefits outweighing any identified harm.

It is clear from regional and local policy that the neighbourhood plan area is not an appropriate location for tall buildings (e.g. buildings over 30m). The policy should reinforce this, but also allow a level of flexibility to facilitate appropriate sustainable development. It is therefore a key issue to address in respect of the intention of the policy and in light of the sub-objective, care being needed to ensure that the policy is consistent with both the London Plan and emerging Westminster City Management Plan.

Policies Map

Please note that the policies map on page 77 identifies Imperial College Road as a local road (shaded light blue), when it is, in fact, a private road.

Yours sincerely,

Gary Lloyd
Head of Property

Planning and Borough Development

Executive Director Planning and Borough Development

Graham Stallwood



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

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

14 February 2018
Please ask for: Chris Turner

Dear Mr Walsh,

Comments on submission version of the of the Knightsbridge Neighbourhood Plan

Thank you for giving the Royal Borough of Kensington and Chelsea the opportunity to comment on the submission (Regulation 16) version of the Knightsbridge Neighbourhood Plan (KNP).

The Council notes that the KNP is explicit in stating that it is made up of three parts: the "Neighbourhood Plan"; the "Knightsbridge Management Plan"; and the "Knightsbridge Evidence Base". (Summary, page 4 of part 1.)

Area of influence

Part two of the KNP, the Knightsbridge Management Plan, includes discussion of what is described as the KNP's "wider area of influence." Much of this area lies within Westminster, and as such, is of no concern to the Royal Borough. However, the "area of influence" includes a parcel of land to the south of Brompton Road - the Harrods department store. This lies within Kensington and Chelsea.

This is of concern as paragraph 2.9 of part 2 of the KNP states that, whilst areas beyond the Neighbourhood Area boundary are not subject to the policies within the Plan, "the Forum reserves the right to comment on applications within the wider area of interest or more widely".

A Neighbourhood Forum, cannot claim any jurisdiction or influence over any area which does not lie within the Neighbourhood Plan area. This is undemocratic and, in all likelihood, unlawful. It is essential that the policies and contents of the Plan, and its supporting documents, relate to the defined Neighbourhood Area only.

Email:

Web: www.rbkc.gov.uk

The Forum may wish to be consulted on applications which lie outside the KNP area. The Neighbourhood Planning Act (2017) is clear in this regard. It states that a local planning authority must notify the neighbourhood forum of “*any relevant planning application*” (section 2 (7)). A relevant planning application is one which “*relates to land in the neighbourhood area*” (2(3E)) It is not one which relates to a property/ land which is adjoining the Neighbourhood Plan area or in a specified “area of influence.”

As such, if the KNP, and its supporting documents, retain the concept of an “area of interest”, the area must be redrawn to remove any land within the Royal Borough.

The removal of any references to a wider ‘area of interest’, or the redrawing of the boundary, 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 formulation of our Local Plan. Similarly, the Council does, and will continue to, consult Westminster City Council on planning applications within the Royal Borough, where appropriate.

Policy KBR18: Retail uses in the International Shopping Centre

The Neighbourhood Plan includes a policy which intends to support A1 uses within the Knightsbridge International Centre. This should be amended to note that the policy only relates to that part of the International Centre which lies within the Neighbourhood Area. This amendment could be within the policy itself or within the supporting text.

Policy KBR26: Existing and new development within the Strategic Cultural Area

Policy KBR27: Public Realm in the Strategic Cultural Area

The Council recognises that the policies intend to ensure that a balance is reached between the need of the cultural institutions within the SCA and the amenities of established residents. This is welcomed as the Council recognise the importance of the SCA in the contribution of London as a “World City”. However, the policies should be amended to recognise that the amenity of residents adjoining as well as within the Neighbourhood Area are properly addressed. This is essential as an intensification of commercial activity has the potential to have a negative impact on those who live close by. This impact would be beyond the designated “neighbourhood stress areas”. For clarity this reference should be added to both Policies KBR26 and KBR27.

Policy KBR28: Enabling Active Travel

This policy considers how new development should provide new or improve existing infrastructure to support and to encourage more cycling and walking. It references Appendix D which includes a number of initiatives to help achieve this aim. These are set out in more detail within the Actions table in the Neighbourhood Management Plan.

It is essential that these initiatives relate to sites within the KNP area only. Actions 52 and 53 are particularly problematical. The promotion of a segregated cycle track along Queen’s Gate, greenways along Exhibition Road and Quietways for cyclists is not appropriate. These initiatives relate to land which lies outside the Neighbourhood Plan area. As such they will have implications of those living within Kensington and Chelsea without giving these residents a chance to vote on the ultimate adoption of the Plan.

The Neighbourhood Management Plan: Management Actions

This document contains a number of actions which relate to areas which lie outside the Neighbourhood Area. This is not appropriate and those actions which relate to land outside the Neighbourhood Area must be removed.

In particular:

Actions 18, 30 and 31. It is not for the Neighbourhood Forum to become involved in this Borough's licencing regime.

Action 33. Whilst this Borough has initiatives to stop rubbish dumping, these will be carried out within the Royal Borough only, and not within WCC and the Neighbourhood Plan area.

Subject to the above, the Council supports the KNP and looks forward to collaborating with the Forum and the City of Westminster to continue to improve Knightsbridge.

Please note that the Council would like to participate in a public hearing if any part of Kensington and Chelsea remains within the KNP's "area of influence", or if the KNP seeks to influence development within this borough. I hope that these comments will be addressed.

Yours sincerely,

Jonathan Wade
Head of Forward Planning

From: Martyn Cooper
Sent: 14 February 2018 15:49
To: Neighbourhood, Planning: WCC Russell
Cc: Beattie; Dymont, Peter
Subject: Ref: Knightsbridge Neighbourhood Plan

Dear Sirs

The Federation of Environmental Trade Associations (FETA) is an umbrella group representing six trade associations. Many of our members have a keen interest in air quality, and in particular, indoor air quality (IAQ).

With reference to Policy KNR 35: Healthy Air, we would fully support the aims of the plan in improving indoor air quality in new and existing buildings. This is, of course closely linked with outdoor air pollution, as improving one will lead to improvement in the other.

FETA has recently formed a working group on IAQ with membership from a wide range of interested companies, and is keen to work with government to develop definitions, standards and measurements related to this subject.

Kind regards

Martyn Cooper MInstR
COMMERCIAL MANAGER



Federation of Environmental Trade Associations



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Knightsbridge Neighbourhood Plan Consultation (Regulation 16)

The Royal Albert Hall is pleased to provide comment on and response to the Knightsbridge Neighbourhood Plan 2017 – 2037, as prepared by the Knightsbridge Neighbourhood Forum.

The Royal Albert Hall is one of the world's most iconic venues, created as part of the vision of Prince Albert for 'Albertopolis', a thriving quarter in London which today still houses many of the nation's finest institutions of culture and education. The Hall's commitment to the promotion of the arts and sciences is as strong today as it was when the Hall opened in 1871.

We welcome the considered approaches of the London Plan, Westminster City Council Plan and Knightsbridge Neighbourhood Plan and in particular the recognition afforded to institutions within Albertopolis as strategic assets for London. The Royal Albert Hall is one of many centres within the Strategic Cultural Area which play a pivotal part in the capital's economic and cultural well-being, offering a diverse range of performance, education, entertainment, outreach, exhibition and expertise to residents, workers and national and international visitors alike.

We support the Knightsbridge Neighbourhood Plan's recognition of the fine balance between cultural, residential and retail priorities and how they are all inter-dependent in maintaining a thriving community. We note that the 42 policies within the Plan need to be taken as a whole so that, for example, specific policies which focus on the protection of the residential amenity need to be set in the context of those which are centred more specifically on the Strategic Cultural Area (KBR26 & 27), and vice versa.

Policy KBR26: Existing and New Development within the Strategic Cultural Area

The Royal Albert Hall is a charity with a two-fold purpose: to promote the Arts and Sciences; and, to preserve and enhance our Grade 1 listed building, which is held in trust for the nation. We constantly strive to achieve these aims by realising our vision to inspire artists and audiences worldwide and create life-enriching unforgettable experiences for everyone. We are committed to inspiring more and more people to enjoy the Hall than ever before; our programme has grown to the point where we currently host more than 380 events in the main auditorium each year, more than 700 events in other spaces and welcome more than 60,000 people on guided tours of the building. This commitment to our charitable purposes and the continual regeneration of the vision of Prince Albert is achieved with no regular central government funding; we mainly rely on generating income from our business operations to generate an appropriate level of operating surplus each year to reinvest in the achievement of our core charitable aims.. In a competitive environment (in the local SCA, as well as across the capital and nationally), it is essential that we are able to continue to provide experiences and facilities which enhance the visitor experience. Therefore any future ancillary developments inside the Hall or in the footprint of its immediate external surrounds would seek to support Policy KBR26 (C) by broadening the appeal of the Hall to a wider audience and by ultimately increasing our income which funds our charitable objectives. Such ancillary developments would seek to promote the Basic Conditions by conformity with the London and Westminster Plans which strive to manage London's heritage and environment, and support and enhance London's cultural and creative sectors and their contribution to the city's economic and social success.



Policy KBR27: Public Realm in the Strategic Cultural Area

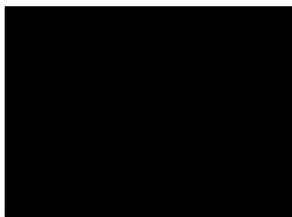
The Royal Albert Hall strongly supports Policy KBR27 (A) which recognises the opportunity to improve the public realm around the Hall, celebrate its unique setting, and connect the cultural and recreational facilities of the Hall and Kensington Gardens. The Hall is working with renowned architects and various stakeholders to realise the 'Re-Imagining Albertopolis' vision to deliver public realm improvement, enhanced access to the Hall and its immediate environs, and incorporated security by design for residents, staff and visitors alike.

The Hall continues to provide a carefully managed programme of activities and events in keeping with Policy KBR27 (B). We participate in the Exhibition Road Cultural Group advisory group to review proposals for events in Exhibition Road, in line with RBKC's policy for events on Exhibition Road. In keeping with the distinct purpose of the Hall as an iconic event venue we also manage our own specific programme of events (inside the building and occasionally in the immediate surrounds) with particular sensitivity to the impact on the residential amenity. This distinction between coordinated temporary event programming across the Strategic Cultural Area and specific programming relating to the Hall as an iconic venue in its own right is essential to the Basic Conditions and in particular to conformity with Policy 4.6 of the London Plan.

Part Two: Neighbourhood Management Plan

The Royal Albert Hall notes that the Neighbourhood Management Plan has no statutory basis and exists to separate policies from actions. As such we recognise that the Management Plan suggests actions which are open to longer-term discussion as ways of supporting the delivery of the Neighbourhood Plan.

The Royal Albert Hall would welcome the opportunity to provide further information to the Examiner, give oral evidence and participate in a public hearing if there is one. Please notify the Hall of the Council's final decision in relation to the Plan.



Craig Hassall AM
Chief Executive
Royal Albert Hall



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

By email only to neighbourhoodplanning@westminster.gov.uk

14 February 2018

Dear Sir / Madam

**Knightsbridge Neighbourhood Plan
Representations on behalf of Westminster Property Association**

I am writing on behalf of the Westminster Property Association to respond to the Regulation 16 consultation version of the Knightsbridge Neighbourhood Plan. We have enclosed a copy of our membership list with this letter. WPA welcome the opportunity to continue to be involved in the evolution of this plan.

We would ask that this letter is read in conjunction with our more detailed response to the Regulation 14 consultation, a copy of which we have also enclosed. As set out within that letter, WPA has not sought to comment in detail on detailed local policy proposals and has sought to focus upon more strategic matters with the potential to affect the relationship of the neighbourhood area with the wider City or which raise issues of general compliance or compatibility with other plans.

We recognise that a number of changes have been made to the draft plan since the previous consultation. In general, the changes made have been helpful and we welcome them but, nevertheless, a number of areas of concern remain which I have set out below.

Growth

We remain concerned that the plan is not pro-growth, and supports less development than that in strategic policy (the relevant policies of the City Plan and London Plan). We are concerned that this may particularly be the case respect of Hyde Park Barracks. The plan does not clearly demonstrate how Knightsbridge will contribute to meeting the City's broader growth targets.

The Plan continues to seek to prevent changes of use away from office uses across the area (Policy KBR21); this is significantly more restrictive than the approach adopted in strategic policy, which only seeks to prevent the conversion of offices to residential use within the Core CAZ. The Plan's support for new Class B1 offices is welcome.

The plan does not appear to strike an appropriate balance social and environmental aspects of sustainability on the one side, and economic aspects on the other. We note that the proposed plan continues to propose the introduction of a Neighbourhood Stress Area which would introduce a more restrictive approach on non-residential uses than set out in strategic policy.

Cumulative impact / complexity

The draft plan continues to seek to impose significant additional burdens – in terms of both cost and procedural / information requirements – on both developers and the City Council (in terms of development management resourcing and enforcing).

In particular:

1. We remain concerned that complex arrangements regarding construction management continue to be proposed (Policy KBR23). These are inconsistent with the well-understood framework established by the City Council in the Code of Construction Practice and its associated requirements for construction management plans, proportionate to the scale and type of development, to be agreed prior to the start of construction;
2. Policy KBR34 would require developers to demonstrate utility capacity at planning stage. This would impose onerous additional requirements on developers when there is an obligation to provide it such capacity, subject to detailed subsequent discussions with the utility companies involved;
3. We recognise that changes have been made to policies relating to environmental performance and sustainability. Where these have addressed areas of concern raised in our previous response these are welcome but we remain concerned about the complexity of the proposed policy framework and, especially, where it does not distinguish between larger and smaller development proposals. This particularly relates to air quality and renewable energy which are strategic, rather than local, issues and which may be more appropriately addressed in City / London-wide policy.

Prescriptive Relevance to planning

In some cases, the proposed policies may go beyond that which can be controlled through the planning system and are potentially too restrictive / prescriptive, particularly in relation to design.

For example:

1. Policies KBR4 and KBR32, as proposed, relate to improvements to the public highway such as the removal of utilities cabinets and installation of cycle hire and electric charging facilities. Whilst these may be desirable, alterations to highways are generally not within the control of developers and we are concerned this may be undeliverable;
2. Policy KBR11 set out very detailed requirements regarding urban greening which may not be achievable in all cases and which may be more appropriate as guidance;
3. KBR28 requires “new development” to provide new or improved active transport infrastructure. Many small scale “developments” (ie, alterations for which planning permission is required) will not be of a size to provide new or improved infrastructure;
4. KBR36 suggest that development should avoid the use of any fossil fuels. It has not been shown that this is deliverable;
5. KBR40 goes beyond strategic policy and national guidance regarding drainage and flood risk;
6. KBR42 encourages consultation and discussion. This is best practice and to be encouraged, but is not appropriate for inclusion as a planning policy to guide landowners and developers as to when proposals will be acceptable.

It is vital that policies relate to the proposed use of land rather than procedural requirements as to how applications are to be determined, which remains the responsibility of the City Council. For example, stipulating the content required in Transport Assessments may not be appropriate (Policy KBR30).

Conclusion

WPA welcomes the opportunity for continued engagement in the production of the Neighbourhood Plan and the changes that have been made to the Submission version following previous comments. Nevertheless, WPA does have some continued concerns over areas of non-compliance with strategic policy, the complexity of the plan and areas in which it appears to stray into setting out procedural requirements rather than town planning policy.

I trust that these comments, along with WPA's previous detailed response, will be passed to the Examiner for her/his consideration. Should you have any queries or wish to discuss this response further, please do contact me.

Yours sincerely

Charles Begley

Executive Director, Westminster Property Association

Enc: WPA membership list
WPA response to the Regulation 14 consultation (15.02.17)



Westminster Property Association

List of WPA members 2018

<i>3D Reid</i>	<i>Barton Willmore LLP</i>	<i>Caneparo Associates Limited</i>
<i>8build</i>	<i>BDG Sparkes Porter LLP</i>	<i>Capco Covent Garden</i>
<i>Ableprop</i>	<i>BDO LLP</i>	<i>Cavendish Communications</i>
<i>Academy Consulting Solutions Ltd</i>	<i>BDP</i>	<i>CBRE Ltd</i>
<i>AECOM</i>	<i>Belgrave Communications</i>	<i>Charles Russell Speechlys</i>
<i>AKT II</i>	<i>Berkeley Group</i>	<i>Child Graddon Lewis Ltd</i>
<i>Alchemi Group</i>	<i>Berners-Allsopp Estate</i>	<i>Chiltern Firehouse</i>
<i>Allford Hall Monaghan Morris</i>	<i>Berwin Leighton Paisner</i>	<i>Church Commissioners</i>
<i>Allsop LLP</i>	<i>Bidwells</i>	<i>CityWest Homes Limited</i>
<i>Almacantar</i>	<i>Bircham Dyson Bell LLP</i>	<i>Clivedale Ventures Ltd</i>
<i>Amazon Property</i>	<i>Blackstone</i>	<i>Cluttons LLP</i>
<i>Amshold Group Ltd</i>	<i>BMO Real Estate</i>	<i>CMS Cameron McKenna Nabarro Olswang LLP</i>
<i>Anquila Corporation c/o London & Oriental</i>	<i>BNP Paribas Real Estate</i>	<i>Colliers International</i>
<i>Arcadis LLP</i>	<i>Boodle Hatfield</i>	<i>Comm Comm UK Limited</i>
<i>Argent</i>	<i>Bouygues UK</i>	<i>Core Five</i>
<i>Artichoke</i>	<i>Brecher</i>	<i>Coverdale Barclay Ltd</i>
<i>Arup</i>	<i>Brimelow McSweeney Architects Ltd</i>	<i>Craig Ewan</i>
<i>Ash Mill Developments Ltd</i>	<i>British Land</i>	<i>Cratus Communications</i>
<i>Ashurst</i>	<i>Brookfield</i>	<i>Crosstree Real Estate Partners</i>
<i>Astrea Asset Management Ltd</i>	<i>Buckley Gray Yeoman</i>	<i>Curtin&Co</i>
<i>Aukett Swanke</i>	<i>Built Environment Communications Group (BECG)</i>	<i>Cushman & Wakefield LLP</i>
<i>Aviva Investors</i>	<i>Burgess Salmon LLP</i>	<i>D2 Private Ltd</i>
<i>Balfour Beatty</i>	<i>Buro Four</i>	<i>DAC Beachcroft LLP</i>
<i>BAM UK Ltd</i>	<i>Cadogan Estate</i>	<i>Daniel Rinsler & Co</i>
<i>Barr Gazetas</i>	<i>Campbell Architects</i>	<i>Daniel Watney LLP</i>
		<i>Darling Associates</i>



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<i>Delancey Real Estate Asset Management Ltd</i>	<i>Gascoyne Holdings Ltd</i>	<i>JLL</i>
<i>Deloitte Real Estate</i>	<i>Gerald Eve LLP</i>	<i>JM Architects</i>
<i>Dendy Byrne</i>	<i>GL Hearn</i>	<i>John Robertson Architects</i>
<i>Derwent London PLC</i>	<i>Gleeds</i>	<i>Keystone Law</i>
<i>DLA Architects</i>	<i>GMS Estates Ltd</i>	<i>Knight Frank LLP</i>
<i>DLA Piper UK LLP</i>	<i>GN2 LLP</i>	<i>Knight Harwood</i>
<i>Dolphin Living</i>	<i>Grafton Advisors</i>	<i>Kohn Pedersen Fox Associates (International) PA</i>
<i>Dominvs Group Ltd</i>	<i>Great Portland Estates PLC</i>	<i>Lancer Property Asset Management Ltd</i>
<i>DP 9 Ltd</i>	<i>Greater London Properties</i>	<i>Landmass</i>
<i>Dukelease Properties Ltd</i>	<i>Grosvenor</i>	<i>Landsec</i>
<i>Elliott Wood</i>	<i>Grosvenor Securities Ltd</i>	<i>Langham Estate Management Ltd</i>
<i>Emrys Architects</i>	<i>Grove End Housing</i>	<i>LaSalle Investment Management</i>
<i>EPR Architects Ltd</i>	<i>GVA</i>	<i>Legal & General Property</i>
<i>Equals Consulting</i>	<i>H Planning</i>	<i>Levy Real Estate LLP</i>
<i>European Land</i>	<i>Hadley Property Group</i>	<i>Lifschutz Davidson Sandilands</i>
<i>Eversheds Sutherland</i>	<i>HB Reavis UK Ltd</i>	<i>Linklaters LLP</i>
<i>Exemplar Properties Ltd</i>	<i>Heyne Tillett Steel</i>	<i>Lockton Real Estate</i>
<i>Eyre Estate</i>	<i>Hines UK Ltd</i>	<i>Lodha Developers UK Ltd</i>
<i>Faithful+Gould</i>	<i>Hoare Lea</i>	<i>Loftus Family Property</i>
<i>Farrer & Co LLP</i>	<i>HOK Cube Architects</i>	<i>London Communications Agency</i>
<i>Fathom Architects</i>	<i>Howard de Walden Estates Ltd</i>	<i>London School of Economics and Political Science</i>
<i>Feilden+Mawson LLP</i>	<i>Howard Kennedy</i>	<i>Lothbury Investment Management</i>
<i>Flanagan Lawrence</i>	<i>Iceni Projects Limited</i>	
<i>Four Communications</i>	<i>Indigo Planning</i>	
<i>Freeths LLP</i>	<i>ISG PLC</i>	
<i>FTI Consulting</i>	<i>iWS Invest</i>	
<i>Galliford Try Building</i>	<i>Jackson Coles LLP</i>	



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<i>Make Architects</i>	<i>Pell Frischmann</i>	<i>Shaftesbury PLC</i>
<i>Malcolm Hollis LLP</i>	<i>Pellings</i>	<i>SHH Architects</i>
<i>Maples Teesdale LLP</i>	<i>Pemberton Greenish</i>	<i>Signet Planning</i>
<i>MATT Architecture</i>	<i>PGIM</i>	<i>Simon Bowden Architecture</i>
<i>McLaren Construction Ltd</i>	<i>Pilbrow & Partners</i>	<i>Skanska UK</i>
<i>Meinhardt (UK) Ltd</i>	<i>PIRO Architects</i>	<i>Soho Estates Ltd</i>
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<i>Momentum Transport Planning</i>	<i>Potter Raper Partnership</i>	<i>Stanhope PLC</i>
<i>Monmouth Dean</i>	<i>Price and Myers LLP</i>	<i>Steer Davies Gleave</i>
<i>Montagu Evans LLP</i>	<i>PSP Investments Europe LP</i>	<i>Stiff+TrevillionArchitects</i>
<i>Morgan Sindall</i>	<i>Publica Associates Ltd</i>	<i>Stow Securities PLC</i>
<i>MMSR Architects</i>	<i>Qatari Diar</i>	<i>TateHindle Ltd</i>
<i>Muxworthy LLP</i>	<i>Quantem Consulting LLP</i>	<i>Taylor Wimpey Central London</i>
<i>Nash Bond</i>	<i>Quod</i>	<i>The Crown Estate</i>
<i>National Planning Forum</i>	<i>RadcliffesLeBrasseur</i>	<i>The Mercer's Company</i>
<i>Norges Bank Real Estate Management</i>	<i>REDEVCO</i>	<i>The Portman Estate</i>
<i>Norton Rose Fulbright LLP</i>	<i>Regal London</i>	<i>Thomas & Thomas Partners LLP</i>
<i>O and H Properties Limited</i>	<i>Remarkable Group</i>	<i>Tishman Speyer</i>
<i>Oliver Burns</i>	<i>Residential Land</i>	<i>TP Bennett</i>
<i>Osborne</i>	<i>Ridgeford Developments Ltd</i>	<i>Trehearne Architects</i>
<i>Oxford Properties</i>	<i>Robert Bird Group</i>	<i>Tuckerman</i>
<i>PCW Planning and Development</i>	<i>Rolfe Judd</i>	
	<i>RPS Group</i>	
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Westminster Property Association

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Westbrook Partners

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Winckworth Sherwood

Woods Bagot

Wragge Lawrence Graham

LLP

WSP

YardNine

Zaha Hadid Architects

Chris Bowden
Troy Navigus Partnership

By email only to consultation@knightsbridgeforum.org

15 February 2017

Dear Sir

Knightsbridge Neighbourhood Plan: Response on behalf of Westminster Property Association

I am writing on behalf of Westminster Property Association to respond to the draft submission version of the Knightsbridge Neighbourhood Plan. Westminster Property Association represents property owners, developers, investors and advisors active within the City of Westminster and I have enclosed a copy of our current membership list with this letter.

WPA welcomes the opportunity to respond to the emerging Neighbourhood Plan. There is a considerable amount of locally specific detail within the Plan. In broad terms, WPA recognises the clear expression of local priorities and concerns contained within the draft Plan. This will contribute to shaping development proposals to respond better to well-understood local priorities.

WPA has not generally commented on detailed local policy proposals. Our comments are restricted to wider, more strategic matters with the potential to affect the relationship of the Neighbourhood Area with the wider City, or which raise potential issues of general compliance, or compatibility with other plans.

Relationship with the CAZ

The Neighbourhood Plan should establish Knightsbridge more clearly as a key part of the Central Activities Zone. This is a key, determining, land use designation which establishes, in broad terms, the range of uses that are appropriate in principle in the area.

The Strategic Cultural Area, particular built heritage, and collection of world-class institutions that characterise Knightsbridge illustrate the particular importance of the area to the Central Activities Zone. The Plan should acknowledge this more clearly.

For example:

- i. Paragraph ii.22 - it is important to acknowledge that, as part of the CAZ, the area has a strategic economic role, not merely a local one;
- ii. Paragraph iii.5(i) describes the area as “residential”; whilst the area has a significant residential component it is important that it is understood to be – and treated by planning policy – as a key contributor to the character of the CAZ and, therefore, more than purely residential;
- iii. Likewise, iii.5(ii) refers to both the retail and SCA districts but does not refer to inclusion within wider CAZ.

Strategic context

The City Plan, and the adopted London Plan, both set ambitious targets for the growth of the City. This includes delivering at least 1,068 new homes per year, and floorspace for approximately 58,000 new jobs (774,000sqm B1 office floorspace) from 2016/17 to 2036/37.¹ The majority of the new jobs are likely to be in office and employment accommodation accommodated within the Core CAZ.

WPA is concerned that the Neighbourhood Plan does not address how the Neighbourhood Area envisages contributing towards meeting these targets. It is important that the Neighbourhood Plan does seek to accommodate the area's share of the strategic growth target of the City, to direct the area's growth.

You will be aware that the Government has proposed introducing additional protections for Neighbourhood Plans where they have met their share of the area's housing target, even where the local authority's local plan does not provide for an adequate housing supply.

This is consistent with Paragraph 16 of the NPPF, which states that neighbourhoods should:

“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development.”

For example, whilst the draft Plan does not clearly direct its share of the quantum of development required within the area, it does contain proposed policies which, taken in isolation, would appear to introduce additional constraints upon development capacity.

For example, Policy KBR1 would require that proposed developments **“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...”**. KBR11 takes a similar approach to rooftop extensions. WPA is concerned that the Plan does not demonstrate how this will be achievable whilst still contributing to delivering the area's share of the City's overall targets.

To this end, we suggest that the approach to tall buildings is amended, to align it with that of the London Plan. The London Plan definition of tall buildings, that is, buildings “substantially” taller than their surroundings, rather than significantly. Larger buildings are likely to be necessary to accommodate growth in Westminster. In most cases larger buildings will not be “tall buildings” as is commonly understood and to which both Policy KBR7 and London Plan 7.7 relate. The Neighbourhood Plan should not seek to impose criteria that relate to tall buildings on buildings which may simply be higher than their surroundings.

Scope of applications

The Plan provides a clear expression of design elements, and other features such as elements of the public realm, particularly valued by the neighbourhood area. This is welcome and will provide useful, detailed, guidance to developers and property owners.

Some elements, particularly aspects of improvements to the public realm, are not directly within developers' control. We therefore welcome the fact that policies are positively worded, supporting proposals that would lead to such improvements but without requiring new development to deliver directly this type of improvement to the public realm, as this would not be achievable.

There are other aspects of detail with which WPA has some concerns, relating to the treatment of planning applications by the City Council. For example:

¹ London Plan Policy 3.3 and City Plan Policy S20.

1. Paragraph 3.5 indicates that the City Council is expected to agree the methodology for assessing noise and trip generation with the Forum prior to the submission of a planning application and refuse planning permission where such agreement is not given; and
2. Paragraph 3.6 indicates that the City Council should agree the local of townscape views with the Forum and, likewise, refuse permission where such agreement is not given.

The emerging Plan should reflect the Forum's role as a plan-making body. The forum, whilst it will be consulted on planning applications, will not determine them, nor does it have any formal locus to direct the procedural approach taken by the City Council to the determination of applications, beyond establishing a local tier of development plan policy. Elements of the Plan which attempt to specify how the City Council should, practically, go about determining applications, such as these paragraphs, should be removed.

Metropolitan Open Land and Hyde Park Barracks

WPA recognises the particular sensitivity of MOL policy to the Neighbourhood Area.

We suggest that Policy KBR14 should be positively worded, indicating that planning permission should be granted where the various criteria are satisfied. The interrelationship between Policies KBR14 and KBR15 is unclear and we suggest that this is reviewed; the two appear to be addressing the same policy area. KBR44(B) also appears to duplicate part of these policies.

It may be appropriate to consider the approach taken to Hyde Park Barracks, as a potential strategic site, in the context of the area's need to address its share of the City Plan's strategic development needs, especially if the retention/reversion of the Barracks to parkland is sought. Part (C) of Policy KBR16 is also inconsistent with CAZ policy which is clear that a range of land uses are acceptable in principle within the CAZ; it would be for an applicant bringing a development forward to demonstrate that it would be acceptable against other development plan policies. Policy KBR16 should not prejudice the outcome of that assessment.

Office Accommodation

WPA welcomes the support given for new office development at Policy KBR25 and the acknowledgement of the wider economic role of Knightsbridge.

KBR25 (B) and (C) take a significantly more restrictive approach to the conversion of office accommodation to other uses than within adopted local plan policy. Policy S20 of the City Plan does not prevent the conversion of offices to uses, apart from residential, within the Core CAZ. Conversion to uses, such as retail, hotel or institutional use, is acceptable in principle. This flexibility in the range of land uses acceptable in principle within the CAZ is a key strategic land use policy. The range of uses present within the Knightsbridge area illustrates the importance of flexibility in land use policy. The Neighbourhood Plan should not seek to constrain this. We are concerned that this is an area of non-conformity.

Neighbourhood Stress Area

The Plan seeks to create a Neighbourhood Stress Area. Within the Stress Area, Policy KBR17 and KBR18 would require a more restrictive approach to the location of entertainment uses, including daytime/evening entertainment uses such as restaurants and cafes. The approach set out would be more restrictive than provided for by Policies TACE8-TACE10 of the adopted UDP, which already set criteria against which such proposals should be considered.

Assessing cafes and restaurants, and other daytime/early evening uses, against the same criteria as late night entertainment uses, is not appropriate and does not reflect the range of uses caught within the

“Entertainment” definition. KBR18 refers to night-time and early-morning uses, although KBR18(C) then seeks to control a range of daytime, evening and night-time uses. It would prevent cafés and restaurants on all Local Roads. This would prevent such development in a significant part of the Neighbourhood Area.

Paragraph 184 of the NPPF states that **“Neighbourhood plans and orders should not promote less development than set out in the Local Plan.”** Introducing a Stress Area designation, a more restrictive policy approach within it, and restrictions on Local Roads would promote less development than within the City Plan. We are concerned that this is an area of non-conformity. The extension of Stress Areas should be considered at a strategic, City-wide, level.

Construction Management

There are some matters of detail relating to construction management with which WPA is concerned. The City Council has recently revised the Code of Construction Practice to ensure that there is a comprehensive and robust approach to managing construction effects across the City.

A requirement for a Knightsbridge Construction Management Plan (CMP), in addition to a Westminster CMP, would introduce additional complexity and duplication. No evidence is provided to justify the introduction of a policy requirement for a Knightsbridge CMP in addition to a Westminster CMP. This would add time, cost and delay to development. Policy KBR27 acknowledges that in some cases the Knightsbridge CMP would be more restrictive than the Westminster CMP.

This policy would not promote the development of the area and is consistent with wider policies and plans. It would impose significant additional cost and complexity on minor development proposals, beyond those set out the City Council’s Code of Construction Practice.

The implementation, monitoring and enforcement of a second, parallel, CMP mechanism would require additional resourcing but it is not clear from where this will be supplied. It would not be reasonable to subject developers to two, parallel sets of monitoring charges. It would be disproportionate for such charges to be secured through s106, especially for smaller developments where s106 would not, currently, be required. It would impose significant additional resourcing requirements on the City Council. Were a similar approach to be adopted elsewhere in the City, the problem would be compounded with applicants required to submit complex, detailed CMPs for almost all forms of development. These would vary in scope from location to location. This is unnecessary.

For the avoidance of doubt, CIL contributions could not be used to fund construction monitoring, as construction monitoring is not within the definition of “infrastructure”, on which CIL is required to be spent.

Infrastructure, energy and air quality

Policy KBR40 would require developers to demonstrate utility capacity at planning stage. Utility providers (particularly water, gas, sewage and electricity) are under an obligation to provide services. Whilst forward planning of infrastructure provision, insofar as the regulatory regime enables it, is to be welcomed, it should not be a town planning requirement.

This would impose onerous additional requirements on developers, at application stage, to demonstrate infrastructure capacity when there is an obligation to provide it, subject to detailed subsequent discussions with the utility companies involved. Attempting to establish this capacity at planning stage is not necessary and would be unduly restrictive.

WPA supports developing a long-term, comprehensive Infrastructure Investment Plan for London to accelerate the provision of new infrastructure for development.² WPA particularly supports increasing the availability of superfast broadband, through wireless and fixed-line technology and supports new targets on telecommunication providers to deliver new services.

WPA supports efforts to reduce air pollution. This is why it has called on the Mayor to **“encourage reductions in all harmful emissions from vehicles and buildings, particularly CO₂ and NOx.”**³ This is best achieved by clearly understood, City- or London-wide strategic policy that can be applied consistently across development.

WPA objects to Policy KBR41 as drafted. It is unclear as to whether Part A relates to air quality or climate change. It is not **“drafted with sufficient clarity that a decision maker can apply it consistently.”**⁴ The term **“the health of the air”** is not defined, not are the implications of the Paris Agreement for planning decision making on air quality set out.

Part B would impose very onerous assessment requirements upon the City Council and would go substantially beyond existing policy. No evidence has been supplied to demonstrate that these proposals are achievable. This includes demonstrating that zero local / total emissions to air are practical and demonstrating that this is practical when associated vehicle emissions are included. Securing the effect of the development and the maintenance of its equipment throughout the lifespan of the development would not be enforceable and so could not be secured through a s106 planning obligations.

Aspects of the proposed policy wording are unclear. This includes the difference between **“zero local emissions to air now”** and **“zero total emissions to air by 2020”** and the reference to permitting development, where WHO guidelines are met, when justified **“by the principle of sustainable development as understood in International Law.”**

Policy KBR41 does not provide a clear framework for planning decision making and adopts a significantly more restrictive approach to development than strategic policy. No evidence has been supplied to demonstrate that it is achievable.

Likewise, WPA is concerned that Policy KBR42 is very significantly more restrictive than strategic policy within London Plan Policies 5.2 and 5.7. It objects to it, as drafted.

No evidence has been supplied to demonstrate that it is feasible to require all development to obtain 100% of its energy from renewable sources by 2020. Electricity, in particular, will continue to be grid-supplied (as is implicitly recognised by the policy which accepts some limits on the target on on-site renewable energy). Local planning policy should not, therefore, exclude new developments from being able access competitive grid-supplied energy in favour of renewable-only suppliers. The associated costs of this – even if technically feasible – would impose a very significant additional cost.

This is a matter best addressed at a strategic level; no evidence has been supplied to demonstrate this approach to grid-supplied energy is either necessary at a local level, or feasible.

Parts B(c) and B(e) would prevent the use of gas, including for residential occupiers to cook with and to heat their homes. This is not justified. It is not internally consistent with Policy KBR40 B(b), which requires developers to plan for an incoming gas supply.

The requirement for at least 25% of energy needs to be generated on-site by 2020, rising to 50% by 2025%, has not been supported by a robust evidence base. Whilst development in Westminster regularly

² WPA/CPA Manifesto for the Mayor, p.4

³ Ibid., p.5

⁴ Planning Practice Guidance, Neighbourhood Planning, Para 041 Reference ID: 41-041-20140306

meets or exceeds challenging carbon reduction targets, the proportion of energy generated on-site from renewable sources is generally low. This is because underground constraints and the capacity of the aquifers limit the potential for ground-source heat pumps, average wind speeds in central London are relatively low, and roofspace available for PV panels is constrained. Achieving these targets on-site is not likely to be possible without radical changes to the design of buildings, which would be contrary to adopted and emerging Neighbourhood Plan design policies. No evidence has been supplied to demonstrate that these are feasible.

We are also concerned that KBR47 would seek to make health a material consideration in all planning decisions. Health may, or may not, be a material consideration depending on the development proposed. The Plan should not prejudge the determination of any application by specifying which factors should be treated as material. For example, alterations to a shopfront are unlikely to have health implications. Mitigation of vector borne disease should not be included as a policy requirement; this is unnecessary in ensuring that development responds to climate change and reduces the urban heat island effect.

The City Council's adopted Policy S28 requires exemplary standards of sustainable design. New strategic development in Westminster generally achieves Outstanding or Excellent BREEAM scores. Where the highest score is not achieved, in order to comply with policy, it is necessary to demonstrate that other credits cannot be achieved. Requiring an Outstanding BREEAM score would be more restrictive. This would raise an area of non-compliance.

Summary

In summary, WPA welcomes the expression of local priorities contained within the draft Plan. These will provide clear guidance to developers and landowners.

WPA considers that the plan should demonstrate more clearly how the development of the Knightsbridge Neighbourhood Area will contribute to delivering the wider housing and economic growth objectives of the City, particularly given the inclusion of the area within the CAZ and the particular importance of its rich mix of uses. This would assist in demonstrating how the plan will support, rather than constrain, the right type of development.

WPA is concerned that there are areas of non-conformity, particularly relating to the protection of office floorspace and the introduction of Stress Areas. In other areas, WPA is concerned that the Plan attempts to go beyond development plan policy into specifying procedural matters relating to the determination of an application, or subsequent enforcement. This includes noise, views and the implementation of more detailed construction management arrangements. WPA has serious concerns that the proposed policies on air quality and renewable energy are unclear, impractical and not supported by an evidence base. WPA is concerned that they would act as a very significant additional constraint on development.

We trust that this is a helpful response, but should you have any queries relating to it please do not hesitate to contact me.

Yours faithfully

Charles Begley
Executive Director, WPA

From: Victoria Bankes Price
Sent: 14 February 2018 16:26
To: Neighbourhood, Planning: WCC
Subject: Woodland Trust Response to the Westminster Neighbourhood Plan

Dear Sir / Madam

Thank you very much for consulting the Woodland Trust on the Westminster neighbourhood plan, we very much appreciate the opportunity. Neighbourhood planning as an important mechanism for embedding trees into local communities, as such we are very supportive of the policies set out in the plan.

We welcome the way that trees are at the heart of the plan, that they are recognised as central to the special character of Westminster and that this is reflected throughout the plan. Most notable is the consideration of succession planting and tree disease.

We view the Westminster Plan Policy KBR39: Trees as a best practice example that once made we will share with other neighbourhood forums and parishes. My only comment (which is only for clarity and in no way impacts the soundness of the plan) is that the numbering of this policy could be improved to ensure it can be referenced effectively, using a mixture of number and letters would be clearer than just using upper and lower case letters as at present.

If you have any queries regarding our submission please do not hesitate to get in touch.

Best wishes

Victoria

Victoria Bankes Price
Planning Advisor



WOODLAND
TRUST

Stand up for trees

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

Our ref: CR-0396
14 February 2018

neighbourhoodplanning@westminster.gov.uk

To whom it may concern

I am writing in my capacity as a Green Party Member of the London Assembly to respond to Westminster City Council's (WCC) consultation on the Submission Version of the Knightsbridge Neighbourhood Plan (Neighbourhood Plan) produced by the Knightsbridge Neighbourhood Forum (Neighbourhood Forum).

I support the Neighbourhood Plan and am very pleased to see a Neighbourhood Forum in the City of Westminster producing such a comprehensive plan and one that proposes practical steps to achieve truly sustainable objectives.

My specific further comments include:

1. Alignment of policies to the United Nations' Sustainable Development Goals (SDGs) and other essential outcomes

The Neighbourhood Plan is the first local plan that I am aware of that makes a serious effort to align itself to relevant SDGs and proposes practical pathways (policies and neighbourhood actions) to achieve these and other important outcomes. For instance mitigation and adaptation to climate change. In contrast, the draft New London Plan seems, with a number of exceptions, to be focused on incremental steps as part of a tick box approach, rather than achievement of clear and meaningful end points. I will be asking the Mayor of London to do better. Please see my Mayors Question:

http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_297519



2. Neighbourhood Planning in the London Plan and forthcoming Westminster City Plan

The Neighbourhood Forum is clearly seeking to make the most of its powers under national legislation and guidance. I am concerned therefore that the Westminster City Plan, in its Regulation 18 notice, may seek to curtail or not support fully respectively neighbourhood planning in London. Either or both would be a mistake and so I urge WCC when considering the Neighbourhood Plan and its own new Revised City Plan to empower not curtail neighbourhood forums in pursuing their aims. I will be following up also with the Mayor of London. Please see my Mayors Question:

http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_297523

3. KBR23: Construction activity

Construction activity is necessary but well known to be a major source of congestion, air pollution, noise and road traffic collisions including deaths. I support the Neighbourhood Forum's approach in KBR23 to 'require' significant developments to address certain issues. However, while I support the proposals in Appendix C to address these issues on a case-by-case basis, I encourage the Planning Examiner to tighten the application of the Appendix C requirements so that they are all 'required' on a 'best efforts' basis unless a developer can demonstrate convincingly that a particular standard or procedure is technically impractical or not relevant. A robust approach is needed particularly in the Central Activities Zone which includes the Knightsbridge Neighbourhood Area.

4. KBR35: Healthy Air

This policy seeks laudably to address local air pollution and greenhouse gas emissions together to protect health and the climate. Impressively, key elements of it seem to have been copied subsequently by the Mayor of London in the Air Quality policy of his draft New London Plan e.g. so that both policies align to requirements in Directive 2008/50/EC on ambient air quality and cleaner air for Europe. It is also excellent to see that KBR35 proposes steps to improve indoor air quality. I support strongly this whole policy. If anything, KBR35 should be significantly tighter (and certainly not weaker) by requiring more of developers sooner given the seriousness of the 'air' problems in the Central Activities Zone.

5. KBR36: Renewable energy

The Neighbourhood Plan does much better than the draft New London Plan at setting a pathway to encourage a shift to energy efficiency and renewable energy to mitigate climate change. In particular, the Neighbourhood Plan bites the bullets of needing to address: local air quality; the refurbishment of properties as well as new development; and the total energy needs of buildings (instead of assuming simplistically, as the Mayor does, that the Government will decarbonise the national grid at an adequate pace). Impressively, the Neighbourhood Plan proposes to address these issues in a realistic and deliverable way. I will be asking the Mayor to do better. Please see my Mayors Question:

http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_297521



6. KBR39: Trees

The Neighbourhood Plan rightly identifies the vital role of trees in the urban forest in London and the risks of pests, disease, climate change and failure to stagger the planting of new trees. Its Tree Policy and Tree Management Plans seem an excellent and practical way to preserve and enhance the urban forest at no significant cost.

7. Objective 7.0 — Enable active travel and personal mobility

I strongly support objective 7 to enable active travel and personal mobility, in particular the aspiration for motor vehicle-free streets at 7.14. Given this objective, I am surprised that policy KBR14 on the Hyde Park Barracks land H, allows for so much car parking. “Less than one space per unit” is still a lot of car parking. In a central London location with excellent public transport I would expect any new development to be car free.

8. KBR42: Sustainable development and involving people

It is excellent to see the Neighbourhood Plan encouraging sustainable development so explicitly and seeking to implement the spirit and letter of the Aarhus Convention in its proposed Knightsbridge Community Engagement Protocol in Appendix F. As with the 'Construction activity' policy and Appendix C, the clarity it offers will assist the local community, developers, planning officers and others to improve local decision making in a consistent and practical and therefore time and cost saving manner.

9. Developer contributions (page 78)

The Neighbourhood Plan offers a systematic approach to address serious, systemic and likely increasing problems. I support this approach, which combines principles and specific projects, and active community engagement in such matters.

Part Two

While I also support the Neighbourhood Forum's Neighbourhood Management Plan (Part Two), I would encourage the Forum to be bolder in several areas e.g. by supporting the banning of diesel vehicles soon in London and identifying more measures to address urgently the terrible record of Brompton Road and Knightsbridge for deaths and injuries from road traffic collisions.

I support this Neighbourhood Plan and encourage the Neighbourhood Forum to achieve its 20 year 'vision'.

Yours sincerely

Caroline Russell AM



From: Andrew Meads
Sent: 14 February 2018 16:35
To: Neighbourhood, Planning: WCC
Subject: Knightsbridge Neighbourhood Plan

To Whom it may concern

I have worked on and off in the Knightsbridge area at both the Royal Albert Hall and now here at The Knightsbridge and would like to express my full support for the Knightsbridge Neighbourhood Forum Plan and the Neighbourhood Management plan.

My main points of concern are the massive reduction in air quality in the area over the last few years and the issues surrounding the Hyde Park Barracks and there much needed presents in the area and long standing history and association with the area.

All the proposals in the plan are aimed at protecting and preserving the area for future generations to come.

Kind regards
Andrew

Andrew Meads
Head of Service Quality
Knightsbridge Residents Management Company Limited

W: www.theknightsbridge.com

ICE London response to the Knightsbridge Neighbourhood Plan

February 2018

On behalf of the London region of the Institution of Civil Engineers, please find our submission regarding the Knightsbridge Neighbourhood Plan. ICE London supports the aims of the Knightsbridge Neighbourhood Plan, and this document highlights some key issues from the Plan which are to be welcomed.

Construction Activity

ICE London strongly supports the principle that construction activity must adhere to good practice regarding air pollution. We believe that a Construction Logistics Plan should be introduced as part of every development planning submission, which embeds good air quality as a key part of Health and Safety assessments.

We agree the construction sector must take a greater responsibility for site emissions and to tackle them through better planning and logistics, with mechanisms such as Air Quality Dust Risk Assessments. Working with the Considerate Constructors Scheme can help support sites to undertake the appropriate monitoring and ensure good air quality management, helping to improve the air quality for all.

Construction standards, procedures, and planning

ICE London agrees with the proposal for 'air quality tool box talks' to raise awareness and the need for contractors and suppliers to comply fully with the Considerate Constructors Scheme latest guidelines.

A zero emissions approach to building should be taken. We are encouraged to see the promotion of good practice of air quality included in this plan, something the ICE has called for as part of our Air Quality Taskforce, which reported in 2017.

Travel

ICE London supports a number of the other policies included in the proposal, including the enabling of active travel. With the upgrading or installation of new infrastructure, the needs of pedestrians and cyclists must be considered to support the wider aims of active travel across the capital.

ICE London are encouraged by the inclusion of zero emission last mile services. This is in line with our own support for vehicle consolidation centres, and is critical to achieving cleaner air targets.

Utilities and communications infrastructure

The policies for electric vehicle infrastructure are strongly supported by ICE London. The inclusion of electric vehicle charging points – both on and off street – as part of new developments should be encouraged. The need to future-proof developments to include rapid charge points is an essential element, and we are pleased to see this included within the Plan.

We also welcome the input regarding utilities and communications infrastructure. Planning must be considered – particularly when additional charge points for electric vehicles are adopted – and how this impacts the wider electricity grid.

Air Quality Taskforce

Published in late 2017, our *Engineering Cleaner Air* report outlined ways in which the industry can help support a move towards cleaner air for all. A summary, including a link to the report can be found [here](#).

The report supports much of the aims outlined in the Knightsbridge Neighbourhood Plan including:

- Promoting good practice air quality planning policy in Neighbourhood Plans to help reduce air pollutant emissions across the capital
- A commitment to vehicle consolidation centres (whereby vehicles consolidate their loads at a centre near the delivery point). This should be done by investing in new consolidation centres, including construction, and ‘last mile’ deliveries
- Supporting pedestrianised routes in a strategic manner
- Embedding a zero emission approach to building planning
- Seek to become a world leading city in electric vehicle usage, whilst taking action to prepare for the growing burden on the electricity grid
- Support a Construction Logistics Plan as part of every development planning submission to embed good air quality

About the ICE

ICE London supports and represents over 9,000 members living and working in the capital.

As a professional body, the Institution of Civil Engineers shares knowledge and actively promotes civil engineering by working with industry, schools, universities, local government and the media.

Celebrating our 200th anniversary, the ICE was established as a learned society in 1818, and provides a voice for civil engineering, continuing professional development and promoting best practice throughout the industry. ICE produces reports, provides thought leadership and develops infrastructure policy to better inform decision makers across the world.

/ENDS

BROMPTON ASSOCIATION

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

Dear Sir/Madam

Knightsbridge Neighbourhood Plan 2017-2037 Submission Version and Supporting Documents

The Brompton Association is a local civic amenity society and registered charity that seeks to protect and enhance the character of the local area. The Association was established in 1973 when the first Conservation Areas were designated in RBKC including the designation of the Brompton Conservation Area. Since 1973 the Conservation Areas in the neighbourhood have been extended to include South Kensington Tube Station. The area of the national museums and Exhibition Road also fall within the Brompton Association's area of operation. We work closely with neighbouring associations such as the Knightsbridge Association and Onslow Neighbourhood Association. However, in relation to the development of the Knightsbridge Neighbourhood Plan (KNP) we have found it extremely difficult to get our views across to those responsible in the Knightsbridge Neighbourhood Forum (KNF) for generating the plan. We have attended meetings and made representations but despite this we find that our views have not been given due weight.

It is for this reason that we now write to set out our concerns. Fundamentally, we **object** to those aspects of the plan which are intended, in our view quite deliberately, to set the policy scene for a geographical area well beyond the boundaries of the KNF which is entirely within Westminster, not RBKC. This is a particular issue with the parts of the KNP that deal with the cultural institutions along Exhibition Road. The majority of these, including the three national museums, are not in Westminster but in RBKC. It is quite wrong, in our view, for the KNP to refer to the area of Exhibition Road that is in Westminster (ie the area of the road to the north of Imperial College) as the Strategic Cultural Quarter and thus deliberately to blur the boundaries by referring to the national museums which lie well to the south. The area north of Imperial College is very largely residential in character – as is most of the area covered by the KNP.

Residents in RBKC will have no vote on the KNP and it is thus undemocratic for policies to be included in the KNP that could affect the amenity of residents living beyond the KNP boundary.

There is in our view a serious lack of balance in the current KNP document. Insufficient care has been taken in describing the character of the area accurately – which is varied and as already mentioned is largely residential. As a result there is a lack of emphasis on the need to protect residential amenity, particularly in the sections which deal with Exhibition Road and the cultural quarter. As such, the document does not sit in harmony with the Westminster City Plan or the London Plan. This is extremely concerning.

When we were first consulted about the KNP we were advised by those running the KNP that its preparation could be helpful in making reference to the whole of Exhibition Road down to and including South Kensington Tube Station. We pointed out then that this was not appropriate and that the KNP needed to restrict itself to its Westminster boundaries. We have continued to make this point but we are still faced now with a document that we consider to be fundamentally unsatisfactory because this point has been consistently ignored. The present document is very long and unwieldy but within the text there are statements which cause us serious concern because boundaries are being blurred and because in Exhibition Road undue emphasis is being placed on promoting the cultural institutions as opposed to protecting residential amenity..

We have seen the detailed representations which have been made by the Prince's Gate Residents' Association in their letter of February 2nd and we concur with Jane Whewell's view that the KNP document is unbalanced. The emphasis on pedestrianisation, on encouraging student accommodation and accommodation for workers at the cultural institutions and on encouraging more cultural and educational uses is very one-sided and simply not appropriate. To recommend that development should be "guided by Prince Albert's ambitions for the Area" is also inappropriate given that well over 150 years on the area has developed into a dense residential neighbourhood.

The KNP supports ancillary developments within "the Strategic Cultural Area which help broaden the appeal and promote the remit of cultural, education and research organisations" but does not specify what these developments might be. This is the kind of sweeping statement that pervades the KNP documentation and it is not appropriate. In terms of the use of Exhibition Road for events, there is an agreed Key Decision Policy (see RBKC's Key Decision Report of September 26th 2011) which remains in force which governs the number and duration of events organised by the cultural institutions in Exhibition Road and provides for local consultation. This document should have been properly referenced and properly reflected in the KNP. This policy document acknowledges that the northern part of Exhibition Road (ie within Westminster and thus within the boundary of the KNP) is unlikely to be suitable for temporary and pop-up events due to its residential character. Yet the KNP does not reflect this and sections of the KNP text which refer to events in Exhibition Road do not provide the same level of protection for residents' amenity as is provided in other sections of KNP text where consideration is given to the need to protect residents' amenity eg. along other major roads.

We recognise that a great deal of work has gone into the preparation of the KNP and there is much that can be commended but there remain areas of profound concern. It is the blurring of the boundary that most concerns us and following on from this the implied assumption that the KNP is a suitable vehicle to make sweeping policies that should be applied to the whole of Exhibition Road and which unduly favour the cultural institutions over and above residential amenity.

Exhibition Road is not the South Bank. It is dense residential neighbourhood and it is deeply worrying that despite this Association and others making this point on several occasions direct to members of the KNF and urging that the KNF confine itself to its own Westminster boundaries and focus on the residential character of its area, the KNF has consistently failed to do this.

We urge you to take our concerns seriously. If you would like further information please let us know. Please also advise us what the next steps are and if there is to be a public hearing this Association would welcome the opportunity to present its concerns more fully.

Yours faithfully,

Sophie Andreae DSG, FSA, IHBC

Chair, Brompton Association

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Andrew Barry-Purcell
Place and Investment Policy Manager
Westminster City Council
6th Floor
5, The Strand
London WC2N 5HR

Our ref: LDF33/LDD36/BS

Date: 14 February 2018

Sent via email to neighbourhoodplanning@westminster.gov.uk

Dear Andrew

Re: Knightsbridge Neighbourhood Plan Submission Consultation

Thank you for consulting the Mayor of London on the Knightsbridge Neighbourhood Plan Submission version. As you are aware, all Development Plan Documents in London including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the NPPF also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Development Plan for the Knightsbridge Neighbourhood Area includes the London Plan, the Westminster City Plan and all the Development Plan Documents (DPD) adopted by Westminster Council.

The GLA provided comment on the pre-submission version of the Knightsbridge Neighbourhood Plan in a letter dated 23 February 2017 sent to Simon Birkett, Chair of the Knightsbridge Neighbourhood Forum.

The Mayor is of the opinion that the Knightsbridge Neighbourhood Plan is in conformity with the London Plan. The Mayor has delegated authority to me to respond on his behalf and his representations are set out below. TfL's comments, which I endorse, are attached as Annex 1.

The London Plan

You will be aware that the Mayor published his draft London Plan for consultation on 1st December 2017. It is anticipated that the Examination in Public of the draft London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Westminster's Development Plan and contain, where relevant, the most up-to-date policies. The Knightsbridge Neighbourhood Plan (KNP) is required to be in general conformity with both the Westminster's City Plan as well as the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan is a material consideration in planning decisions, and gains weight as it moves towards publication.

The Mayor recognises that the KNP is at submission stage and the draft KNP was prepared prior to the publication of the draft London Plan. In light of this, the Knightsbridge Neighbourhood Forum should consider whether an early review of the KNP is required to take account of any changes to strategic policies in the draft London Plan that affect the Knightsbridge Neighbourhood Area, such as the Central Activities Zone, Town Centres and housing delivery.

Neighbourhood Plans

Neighbourhood planning is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. Overly restrictive policies can prevent development and are contrary to the National Planning Policy Framework (NPPF) which has a presumption in favour of sustainable development (NPPF paragraph 14). The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. It is felt that the KNP could go further in setting a clear positive vision for promoting growth in the Plan area and to help meet the strategic needs of both the Westminster City Plan and the London Plan.

General comment

The Mayor is pleased to see that his detailed comments made at the pre-submission stage have been considered and issues regarding the Central Activities Zone in particular, have been addressed.

Housing

Proposed Policy KBR24: Residential Mix including to support local workers and students is welcomed, particularly its support for accommodation to meet the needs of students and employees studying and working in the area. However, in our previous letter, we raised the issue that there was no explicit reference to how the KNP will help Westminster meet and exceed its London Plan housing target of 1,068 units per annum. The potential to deliver additional housing should be explored.

The draft London Plan includes a new housing target for delivering housing through small sites (below 0.25 hectares). Westminster's small sites completions 10-year target is 5,290 or 529 per annum. The KNP could potentially meet a proportion of this target.

Urban Greening

The inclusion of proposed Policy KBR11: Urban Greening is welcomed, particularly for enhancing biodiversity and mitigating the urban island heat effect.

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

This policy could be written more clearly. It is not clear whether there is a distinction between "the amenity of residents..." in A. a. and "environmental amenity" in A. b. It is also unclear what is meant by "demonstrating that individually and cumulatively there are no significant adverse effects on...c. cumulative impacts...".

Protection of public houses

Proposed Policy KBR19: Protection of public houses is welcomed and is in line with the London Plan Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services, and paragraphs 4.48 and 4.48A the latter which refers to the important role that London's public houses can play in the social fabric of communities. In addition, the KNP pubs policy is aligned with the draft new London Plan Policy HC7 Protecting public houses.

Office Uses

Proposed Policy KBR21: office uses is supported particularly as the Plan area is located within the CAZ where office uses should be protected. Draft London Plan Policy E1 Offices requires boroughs to consult upon and introduce Article 4 Directions to ensure viable office locations are not

undermined by office to residential permitted development rights and therefore part D) of the proposed policy is welcomed.

Air Quality

The Mayor supports the objectives of the KNP to improve air quality as this is a priority for him. The Mayor has set out his approach to improving air quality in his draft London Plan and draft London Environment Strategy.

Some of the wording of proposed Policy KBR35: Healthy Air could be clearer, particularly references to environmental standards in part B and what is expected from developers in part F. It should be noted that in line with the NPPF, policies must be deliverable over the plan period.

If you would like to discuss any of the representations in more detail, please contact Br anne tolper [REDACTED]

ours sincerely

Juliemma McLaughlin
Chief Planner

cc Tony Devenish, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Annex 1

Transport for London (TfL) comments

Page 21 POLICY KBR2: COMMERCIAL FRONTAGES, SIGNAGE AND LIGHTING

Support policy h. (signage on the public pavement). Signs/advert boards placed on the highway can cause obstruction to pedestrians and wheelchair users.

Page 22 POLICY KBR4: PUBLIC REALM AND HERITAGE FEATURES

Welcome the citation of TfL Streetscape Guidance and inclusion of a hyperlink to the Streets Toolkit.

Page 26 POLICY KBR8: PEDESTRIAN MOVEMENT ALONG, ACROSS AND ADJACENT TO MAIN ROADS

Welcome the acknowledgement of TfL as highway/approval authority for the major roads in the Neighbourhood Area.

Page 27 POLICY KBR9: ADVERTISING

Welcome specific policy support for controlling advertising, including on phone kiosks, where it would obstruct pedestrian routes. This is a particular issue in central London.

Page 34 POLICY KBR14: THE HYDE PARK BARRACKS LAND

Welcome the requirement that car parking for residential use should *'aim for significantly less than one space per unit'*. However, suggest this goes further to specifically support 'car-free' (bar Blue Badge) development. This is in line with emerging draft new London Plan policy, would support policies elsewhere in the plan that seek to reduce traffic congestion and improve air quality, and would be more consistent with Policy KBR 31 A (motor vehicle use).

Pages 55/56 POLICY KBR28: ENABLING ACTIVE TRAVEL/POLICY KBR29: PEDESTRIANS WITHIN THE MOVEMENT HIERARCHY

Support these policies, which are in line with the Mayor's 'Healthy Streets Approach'.

Page 56 POLICY KBR31: MOTOR VEHICLE USE

Support the encouragement of car free (bar Blue Badge) development and freight consolidation. As the draft Plan points out elsewhere, congestion, particularly on the major road network, is a key issue. Car free development is clearly desirable so as not to exacerbate this.

Page 60 POLICY KBR32: ELECTRIC VEHICLE INFRASTRUCTURE

Part C mentions 'electric cycle hire'. No such scheme currently exists yet in London, so perhaps the supporting text could clarify this policy?

Page 87 Appendix C — Knightsbridge construction standards and procedures C3.3

Welcome the requirement for construction vehicles to be Silver or Gold level Fleet Operator Recognition Scheme (FORS) accredited, and to have the latest applicable Direct Vision Standard. High levels of cycling and pedestrian activity in the area means that construction vehicle safety is a key consideration.

Page 91 Appendix D — Walking and cycling priorities and projects

D2.0 a. mentions Superhighway CS10. The cycle superhighway along South Carriage Drive, which has already been implemented, is the East-West Cycle Superhighway, or CS3. CS10 no longer exists as a named project on the TfL website.