



Neighbourhood Planning  
Policy and Strategy  
Westminster City Council  
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**Submission to Knightsbridge Neighbourhood Plan  
Consultation**

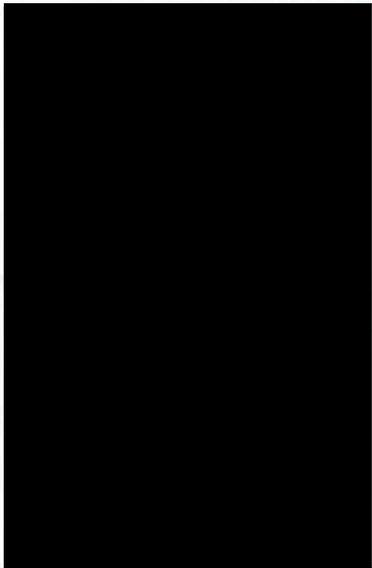
Dear Sir/Madam,

DriveNow is a flexible car sharing service from BMWi and MINI that has already proved to be successful in North East London, since launching in December 2014, as well as 13 cities across Europe. We are responding to the consultation on the Knightsbridge Neighbourhood Plan.

We support policy KBR31 of Knightsbridge Neighbourhood Plan to reduce overall vehicle usage and to incentivise low emission vehicles. Developments in this area of central London do not require parking for vehicles, with the exception of blue-badge holders, due to density of public transport and existing access to vehicles in residential areas through car club/car sharing schemes.

Car clubs schemes that operate currently in London remove 10 private vehicles (Carplus Survey 2016/17) on the road for every vehicle added through the scheme. This not only removes older more polluting private vehicles from the roads, but also reduces the vehicle mileage driven by residents by 781 miles (Carplus Survey 2016/17). Car clubs are also much cleaner vehicles than the existing residential fleet. DriveNow's current fleet includes 16% BMW i3 battery electric vehicles (BEVs) and 84% Euro 6 petrol vehicles. This compares to the national fleet of motor vehicles which is 38% diesel (Department for Transport).

To further increase the proportion of electric vehicles in car club fleets that operate in the Knightsbridge neighbourhood, extensive and open access electric charging infrastructure is essential. We support policy KBR32 on electric vehicle



[REDACTED]

infrastructure. A commitment to open access charging points in future level 1 to 3 developments is essential as this will encourage the highest utilisation of the points and reduce overall street clutter from electric charging points. The introduction of rapid 30 minute or faster and 2 hours or faster charging points in new developments will enable DriveNow to increase the proportion of electric vehicles within its fleet from the current 16%.

Actions set out in the Knightsbridge Neighbourhood Plan part 2 will make a significant contribution to the policy aims set out above in part 1 of the plan. In particular, action 61 for allowing car club vehicles into up to 1 in 8 resident's parking spaces will enable significant reductions in private vehicle usage not only in the Knightsbridge area but also Westminster borough as a whole. Action 65 to introduce 2 hour or faster charging points in the plan area residents parking bays will enable DriveNow to meet its aim of 80% of our fleet to be electric by 2025.

This represents our whole response to the Knightsbridge Neighbourhood Plan Consultation. Please do not hesitate to contact me on [REDACTED] or via email at [REDACTED] if you have any questions or would like any further information.

I look forward to hearing from you.

Yours sincerely,

[REDACTED]

James Taylor  
Managing Director  
DriveNow UK Ltd.



**Neighbourhood Planning, Policy and Strategy**  
**Westminster City Council**  
**6<sup>th</sup> Floor**  
**5 The Strand**  
**London**  
**WC2N 5HR.**

12 February 2018

Dear Sir or Madam,

**Knightsbridge Neighbourhood Plan 2017-2037 ('the Plan')**

We welcome and are generally very supportive of the Plan which seeks to preserve the unique character of Knightsbridge.

**PART I**

**P24, Policy KBR7: Tall Buildings**

There is a presumption against tall buildings, which we support, but we note that there is scope for planners to approve tall buildings in exceptional cases. In the past, The Royal Parks has objected to certain planning applications bordering Hyde Park and Kensington Gardens, notably along South Carriage Drive in Hyde Park, where we have felt that a proposed building would be excessively tall and consequently would have a detrimental impact upon views from within Hyde Park (listed grade I in English Heritage's Register of Parks and Gardens). In certain cases our views are taken on board (usually where there is a widespread negative response) but increasingly it seems that our comments are overlooked.

We firmly believe that it is important to keep the open sky around the parks uninterrupted above the line of the tree canopy to provide a separation of green space from the surrounding metropolis. In addition, large glazed areas lit in winter or eye-catching roof colours can impinge upon the open sky space, to the detriment of the parks.

**P32, Policy KBR13: Metropolitan Open Land**

We understand that this policy is intended to apply to Kensington Gardens, Hyde Park and to the Hyde Park Barracks site. While we generally applaud restrictions upon development within Metropolitan Open Land except in very special circumstances, we would not wish such limitations to impinge upon our ability for example to enhance or replace existing buildings for the benefit of park visitors and to achieve our charitable objectives.

**P34, Policy KBR14: The Hyde Park Barracks Land**

While we would welcome the removal of the tower from the skyline, we note that this Plan supports imposing restrictions on the use of the Hyde Park Barracks site as barracks or for residential accommodation. We understand that there are no definite proposals for this site so it is difficult to gauge whether those restrictions are too onerous.

**P51, Policy KBR26: Existing and new development within the strategic cultural area**

**P52, Paragraph 6.5** – The Albert Memorial is located within Kensington Gardens. Please note that the gates to Kensington Gardens are locked at dusk and consequently are not accessible during the hours of darkness.

**P53, Policy KBR27: Public realm in the strategic cultural area**

Improved links between the Albert Hall and the Albert Memorial have been on our wish list for some time so we very much welcome this policy. However, any improvements to the public realm to provide better links

between the Memorial and the Albert Hall would need to be respectful of the Albert Memorial's grade I listed status and its setting within Kensington Gardens, a grade I listed landscape.

**P65, Policy KBR35: Healthy air**

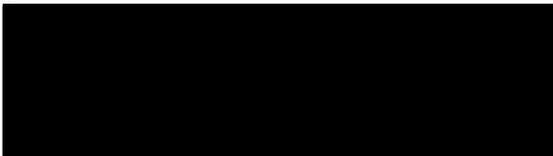
Measures to support sustainable transport and reduce congestion should be encouraged.

**P24 and 25, Policy KBR39: Trees**

We echo the comments of the Friends of Hyde Park and Kensington Gardens. We have a small team of highly qualified and experienced arboriculturalists who manage the tree stock in The Royal Parks, with the ability to call upon consultants and contractors as necessary. We actively manage the trees in accordance with park management plans and tree strategies.

Finally, thank you for the opportunity of commenting upon the Plan. I should be grateful if you would please notify us of Westminster City Council's final decision in relation to the Plan.

Yours faithfully,



Jane Arthur  
Estates Management Branch





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12<sup>th</sup> February 2018

**BY EMAIL**

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

Dear Sir/Madam,

**DRAFT Knightsbridge Neighbourhood Plan - 199 Knightsbridge Consultation Response**

The Knightsbridge Residents Management Company (KRMC) welcomes this opportunity to respond to the Regulation 16 consultation on the submitted Draft Knightsbridge Neighbourhood Plan, which runs until 14<sup>th</sup> February 2018 following its submission to Westminster Council in December 2017.

We are aware that the Knightsbridge Neighbourhood Forum (KNF) have developed the Draft Neighbourhood Plan in close consultation with a range of stakeholders in the Knightsbridge area, and have engaged in detailed discussions with the City Council and other key parties in the lead up to the submission. This is reflected in the final submission of the Draft Neighbourhood Plan, which comprehensively covers and reflects local planning issues and the concerns of residents, businesses and those visiting the area, and as such is supported by the KRMC. It builds on established Local Plan policy, adding local insight and detail on a range of issues of interest to residents of the Knightsbridge Apartments.

**About KMRC and 199 Knightsbridge**

The Knightsbridge Residents Management Company represents the residents of 199 Knightsbridge (also known as the Knightsbridge Apartments), which is a residential building in a key location opposite the Hyde Park Barracks and a short distance from Hyde Park and Knightsbridge London Underground Station. The building was designed by the renowned architects Squire and Partners, completed in 2005 and comprises 205 apartments, mews houses and penthouses. As such the residents of the Knightsbridge Apartments have a keen interest in the Draft Neighbourhood Plan and a number of the policy areas, including issues that directly impact the building, but also the wider Knightsbridge area and community.





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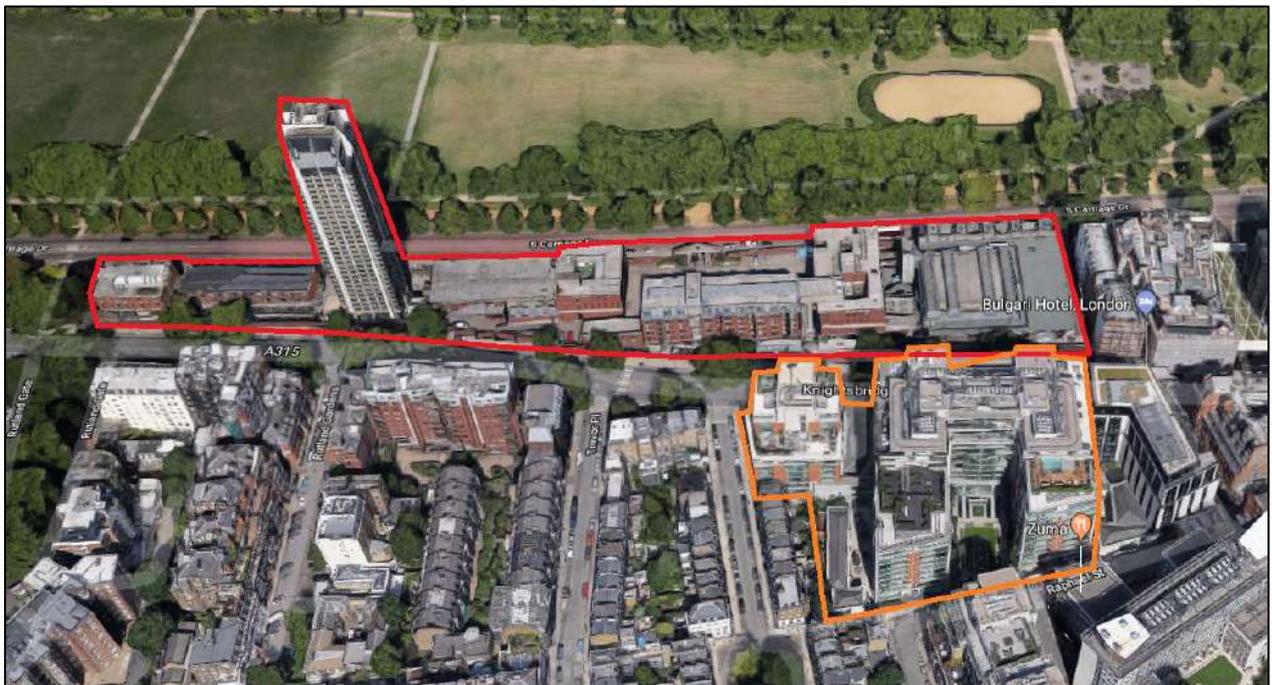
### **The Draft Knightsbridge Neighbourhood Plan**

The KRMC welcomes and supports the Draft Knightsbridge Neighbourhood Plan, which covers key planning issues that will directly affect residents of the Knightsbridge Apartments, but also more general issues that are of concern to residents, which affect the Knightsbridge area more general and quality of life. What follows are the key policies and topic areas that are of particular importance to residents of the Knightsbridge Apartments, which goes beyond our in-principle support for the plan.

### **The Hyde Park Barracks**

The KMRC supports the inclusion of a policy specific to the Hyde Park Barracks ('the Barracks'), and the approach taken towards addressing and assessing the potential full or partial redevelopment of the site. As set out earlier in this letter, 199 Knightsbridge is located directly opposite the eastern end of the Barracks and as such would be directly affected by the partial or full redevelopment of the site. This policy focuses on the designated proposals site as set out in Westminster's adopted City Plan, however is also of relevance to the area to the west of this (included in the image below), which also forms part of the Barracks land providing accommodation and other functions.

**Figure 1: Hyde Park Barracks (red), Knightsbridge Apartments (orange)**



While it is unclear when the Barracks will come forward for development (and in what form), it is allocated in Westminster's City Plan as a Strategic Housing Site of importance for the delivery of the City Plan. You may be aware of the ongoing press coverage that the site is receiving, and it has been identified in Property Week as one of the five development sites to watch in 2018.





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It is therefore essential for the City Council, and for the residents of the Knightsbridge Apartments and the wider Knightsbridge Area, that there is a planning policy in place that will act as a framework to guide any future planning applications for the site. Unlike other strategic sites in the City, the Barracks does not benefit from a planning brief or development opportunity framework, which would set out the context of the site and surrounding area, and then key planning priorities for the site including preferred land uses, design considerations, approaches to height, bulk and massing, open space and other key considerations.

In the absence of such a framework (which the Draft NP also advocates), we support the approach taken in policy KBR14, which seeks to address the partial or full redevelopment of the site, while setting out a number of considerations for future planning applications on the site, supplementing the existing Local Plan policy framework that would apply to any applications. Of paramount importance to our residents is the impact of any proposals on the current standard of residential amenity enjoyed by residents of 199 Knightsbridge. The Barracks at present is a self-contained use, comprising predominantly low to mid rise buildings (with the obvious exception of the existing tower on the western end of the site), and as such has little impact on the day to day lives of our residents. As such we support the retention of the barracks use on the site, be that in full or on part of the site. Should the site come forward as a genuine redevelopment opportunity, it should be undertaken in an appropriate manner in consideration of neighbouring residents, the history of the site and the character of the Knightsbridge area.

The potential redevelopment of the site represents a great opportunity to deliver significant benefits to the Knightsbridge area and Westminster through future applications. These benefits could take the form of housing delivery, and the potential for applications to include the provision of open space and public realm improvements as part of proposals, create routes through to Hyde Park which are currently lacking and would also provide enhanced views of the park, additional planting and greening, and the support of sustainable transport modes amongst others.

### **Views and tall buildings**

Particularly in the context of the future of the Hyde Park Barracks, but also more generally across Knightsbridge, we also support the policy approach on protecting views, and on tall buildings (KBR7). We support the analysis of the LUC report, which comprehensively identifies important local views across the Knightsbridge area. We are concerned about the potential introduction of further tall buildings on the Hyde Park Barracks site, due to potential impacts on the amenity, views and outlook of our residents. As set out above, any application proposals should protect existing residential amenity and be appropriate in terms of their height, bulk and massing in this context, and in the context of the surrounding built environment. As you will see from the image below taken from Hyde Park, it is clear that many of our north facing residents benefit from an open outlook over the existing barracks buildings to Hyde Park, which for many was a key driver for choosing 199 Knightsbridge as their place to live.





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**Figure 2: 199 Knightsbridge viewed from Hyde Park**



### **Public Realm and Pedestrian Movement**

The Knightsbridge Apartments also supports the provisions in the NP around pedestrian movement and the public realm across Knightsbridge. There are a number of roads around 199 Knightsbridge where pedestrian priority and the pedestrian environment would benefit from enhancement, particularly around the local roads to the rear of the buildings including Lancelot Place, Raphael Street and Knightsbridge Green. These local routes are frequently used and heavily congested by servicing and other vehicles, diluting the attractiveness of the pedestrian environment. In addition, the footways around the nearby junction of Knightsbridge and Brompton Road would benefit from enhancement and widening, to provide enhanced crossing options at a currently convoluted junction for pedestrians.

### **Greening**

The policy priority for urban greening (KBR11) is supported, and should be integral to development proposals, as it is within 199 Knightsbridge. This will have benefits in terms of sustainability, the provision of habitats and biodiversity, and also in terms of air quality and the wellbeing of residents. Again associated to the potential development of Hyde Park Barracks, this would present the opportunity for significant greening, and the provision of both public and private open space between Knightsbridge and Hyde Park, on what is designated Metropolitan Open Land, thereby enhancing this designation.





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### **Night time economy**

The approach towards a neighbourhood stress area (KBR15) and the night time economy (KBR16) is supported. While it is appropriate to have an appropriate range of uses in the town centre, we take a close interest in the protection of retail uses, and actively monitor applications for changes of use, or unauthorised changes of use, often making representations to the Council where appropriate. This is because of the potential impact of night time uses on the living conditions of residents in the Knightsbridge area. As a diverse area including the International Shopping Centre, Strategic Cultural Area, these functions often sit alongside residential uses with the potential to impact on residential amenity.

As such, changes of use, hours of operation and other management considerations are of a keen interest to residents, making the proposed policies all the more relevant, as does the concept of having a neighbourhood stress area as proposed in policy KBR15, which seeks to address a number of these concerns around management and operation, as does policy KBR16 around night time and early morning uses. At the same time, we do support the protection of existing public houses as set out in policy KBR19, which serve residential and visitor populations and have been a long-established feature of the area.

### **Construction Activity**

The impact of construction works is a key concern of residents of the Knightsbridge Apartments. As you may be aware, we frequently make representations around Construction Management Plans and Logistics Plans for neighbouring developments, which is important given the constricted highways network that exists between Knightsbridge and Brompton Road in a predominantly residential part of the area, making the management of construction vehicles of paramount importance. We welcome the City Council's efforts with the comprehensive, recently adopted Code of Construction Practice, but would support the amendment of working hours to exclude noisy Saturday working as set out in the NP under policy KBR23. This would be a benefit for the amenity and quality of life of residents in the Knightsbridge Area.

### **Sustainable City and Environment**

We support the provisions that seek to encourage the delivery of electric vehicle infrastructure in the area under policy KBR32, and fully support the chapter of the NP on Knightsbridge's Environment and People. Quality of life and environmental improvement is of paramount importance for residents. Within this, air quality is a key area of concern, which links to numerous other policies around for example encouraging electric vehicles, tree planting and greening, traffic management, and the general policy around healthy people which is fully supported.

### **Supporting Documents**

In addition to the main Development Plan document, we support the Neighbourhood Management Plan as a starting point for engagement and delivery of key actions and priorities relating to specific policies set out in the Development Plan. It sets out a number of key performance indicators and ongoing actions to monitor the success and implementation of policies, while also setting out the need for cooperation between agencies to deliver these objectives.





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In addition, the additional documents including the sustainability reports and supporting evidence base comprehensively sets out the context of the Knightsbridge area and information that has gone into the development plan policies, and is supported.

Summary

In summary, KMRC supports the ambition and scope of the Draft Knightsbridge Neighbourhood Plan, which is an accurate reflection of the key planning issues for the area, in the context of its character and function and the priorities of those living, working and visiting the area. It acts as an appropriate further level of detail to Westminster's adopted local plan, adding value and a further layer of policy that reflects Knightsbridge and its functions on all scales, be that internationally with regards to its retail, arts and cultural and educational offer, down to its local function as a long established residential community.

The key policy areas supported by KMRC and of most relevance to our residents relate to the Hyde Park Barracks site, which is located opposite the Knightsbridge Apartments, particularly relating to its potential full or partial development in the future. It represents a significant opportunity for the Knightsbridge area and Westminster more generally to deliver a number of benefits, but also a potential threat to the residential amenity currently afforded to residents of the Knightsbridge Apartments. As such, the policy for the site is supported, representing an appropriate framework for the determination of future applications on the site.

More generally, KMRC support the objectives of the plan in relation to place making and the creation of a more sustainable city, including the policies on air quality, the natural environment and open space, trees, the provision of utilities and pedestrian movement. In addition, the focus on construction management is welcomed, particularly given the potential for the redevelopment of Hyde Park Barracks to come forward at some point in the near future, in addition to the policies around improving the general environment of Knightsbridge in terms of priorities for future change, and day to day management.

I trust this letter is of use in considering the Draft Knightsbridge Neighbourhood Plan.

Yours sincerely



Chris Barrass  
Managing Director  
**Knightsbridge Company Residents Management Company Ltd**

