

# KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

Hugh Seaborn  
Chief Executive  
Cadogan Estates  
10 Duke of York Square  
London SW3 4LY

By email

23 June 2021

Dear Hugh

## **Brompton Road BID**

Thank you for inviting the Knightsbridge Neighbourhood Forum (“Forum”, “KNF” or “Neighbourhood Forum”) to comment on the Brompton Road Partnership’s (“BID’s”) draft Business Plan. Congratulations on progressing so far and keeping broadly to timetable.

I have consulted Forum colleagues on the draft Business Plan and Arup’s Strategic Vision.

In summary, the Forum is pleased to confirm its support, in principle, for the Brompton Road BID subject to a number of important caveats in relation to Arup’s Strategic Vision where it conflicts with objectives, policies or actions in the Knightsbridge Neighbourhood Plan (“KNP”, “Neighbourhood Plan” or the “Plan”) and/or the Knightsbridge Management Plan (“KMP” or “Management Plan”).

Please focus the BID’s activities on the Knightsbridge International Centre (“KIC”) and understand the concerns of residents particularly about activities outside that area or adjacent to it. If we can get this subtle balance right now, as the KNP has done by seeking ‘win-win-wins’ for residents, businesses and cultural institutions, there is every opportunity to transform Knightsbridge positively over the short, medium and long-term.

We are keen to see the BID established and would warmly welcome frequent dialogue between us so that the Knightsbridge community can work together towards common objectives.

We have a number of specific comments below.

## **Strategic issues**

### ***1. Knightsbridge International Centre***

The Forum supports the BID area being focused on the KIC with the small extension westbound to the eastern end of the Hyde Park Barracks i.e. Brompton Road and Knightsbridge (the road).

## **2. *Investment in the BID area***

The Forum encourages you to set high ambitions for preserving and enhancing the international reputation and status of the KIC. Please therefore benchmark your objectives to match or exceed, in relative terms, the investment and effort going into the transformation of the West End International Centre<sup>1</sup>. The Northbank BID has also done well e.g. Aldwych. Other successful BIDs set a high bar for Knightsbridge. Possible ‘pools’ of investment include grants, the Mayor of London, RBKC, TfL and Westminster (e.g. neighbourhood and strategic funds from the Community Infrastructure Levy).

## **3. *‘High end’ not ‘high-end luxury retail’ per se***

COVID-19, recent changes to the planning system (e.g. Class E) and applications for ‘Certificates of lawful use or development’ to convert shops to restaurants suggest that the vision for the area should be ‘high end’ generally (including luxury hotels) rather than ‘high end luxury retail’ *per se*. Even before COVID-19 hit, the old Burberry store was seeking permission to convert to a 714 seat restaurant. In any event, property owners will have a vital role to play in influencing the direction of the commercial activities. In the Forum’s opinion, the KIC will not fulfil its potential if it consists of a handful of large retail stores surrounded by a sea of cafes and restaurants.

## **4. *Offices have largely disappeared from the Westminster side of the BID***

The Westminster side of the BID area has lost all of its large office spaces other than 1 Knightsbridge Green, which recently lost JWT as an anchor tenant. This reinforces point 3 above.

## **5. *Environment***

The Forum wholeheartedly supports the Business Plan’s emphasis on achieving Net Zero and other environmental priorities. Strategic priorities need to include: achieving zero air emissions from buildings as soon as possible and in any event between 2030 and 2040; protecting and restoring biodiversity; and adaptation to climate change e.g. energy, flooding, greening and urban heat island effects. Well-maintained planters would be a good start but much more greening is needed. Westminster is consulting on its Environment SPD until Monday 28 June.

## **6. *Public realm***

The Forum supports proposals to improve the public realm as has been done successfully elsewhere e.g. in Pavilion Road. Knightsbridge Green represents one important opportunity.

## **7. *Transport***

There are many transport-related problems to address in the Knightsbridge area. These include:

- a. air pollution (including from buildings);
- b. congestion;

---

<sup>1</sup> <https://www.westminster.gov.uk/unveiling-our-plans-iconic-oxford-circus>

- c. Knightsbridge underground station (and Hyde Park Corner) being exit-only when the Winter Wonderland is operating. This raises questions about the viability of increased footfall in the area, particularly if new restaurants or cafes continue to replace retail.
- d. the seven day a week closure of South Carriage Drive, the need for segregated cycling and pedestrian space on the Broad Walk and increased space for vehicles northbound in Park Lane;
- e. reducing risk for all road users in William Street i.e. cyclists, pedestrians and vehicles;
- f. noise from motorbikes and supercars;
- g. there is no obvious space for segregated cycling in Brompton Road;
- h. a record of almost weekly road traffic collisions causing damage or injuring or killing people. This means that changes to railings and crossings must be well thought-through;
- i. hazard from scooters, bicycles and other devices particularly on pavements;
- j. there may be opportunities, as in other areas, to explore the ‘take-over’ of some parking space or loading bays for green space; and
- k. the closing of Brompton Road for events is likely to be challenging.

All these issues need to be addressed with urgency or as priorities.

#### **8. *Hyde Park Barracks and Knightsbridge Green***

Please keep track of possible development at the Hyde Park Barracks, 1 Knightsbridge Green and other large sites.

#### **9. *Planning and licensing***

I am sure you are keeping abreast of the fast-moving changes in the Westminster, RBKC, London and national planning policies and rules including licensing. As a statutory planning body, the Forum takes the lead in a number of these areas and would welcome the opportunity to align efforts with the BID.

### **Residential support for the BID**

#### **10. *Residential priorities for the Knightsbridge Neighbourhood Area (“KNA”)***

The Forum’s public consultations, experience and Neighbourhood Plan show that residents are keen to see improvements in the KIC but would oppose efforts to achieve this at the expense of residential amenity, particularly outside the KIC.

While the Forum has a slightly broader remit, constituency and perspective, it is important to emphasise that it fully supports the above stance by residents. The Forum is unlikely to support and may oppose proposals that conflict with the objectives, policies and/or actions in the KNP and KMP affecting the KNA. Please see section 13 below.

We encourage the BID therefore to understand and support these priorities and the balance struck in the KNP so that everyone’s efforts can be fully aligned from the start.

#### **11. *Knightsbridge Neighbourhood Plan***

The KNF is a residential neighbourhood forum, as required by Westminster, but businesses and cultural institutions have a strong voice including on the Forum’s Board.

As you know, the Neighbourhood Plan was ‘made’ (i.e. adopted) on 12 December 2018 after several years’ work and obtaining 93.0% support in the referendum. You contributed to our success.

The Plan was produced after extensive consultation and an Examination. A key element of the Neighbourhood Plan is the balance it strikes between encouraging commercial activity and improvements in the KIC and the protection of residential amenity outside and adjacent to it. This is articulated in Objective 4.0 (Promote the sense of community) and more particularly in Sub-objective 4.1 which states:

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

In planning policy terms this balance is achieved primarily through three policies:

Policy KBR17: Retail uses in the International [Shopping] Centre which includes:

*The International Shopping Centre (ISC) is a fundamental part of the character that defines Knightsbridge. Development proposals with the ISC... should seek to enhance the ISC’s international reputation and standing through the provision of new retail uses and high quality design.*

This is balanced by Policies KBR14 and KBR15 which are ‘Mitigating the impact of commercial development’ and ‘Night-time and early morning uses in or adjacent to residential areas’ respectively.

Policy KBR14C includes:

*The intensification of retail (Class A) or entertainment uses outside of the International Shopping Area or Strategic Cultural Area must demonstrate no adverse impact on residential amenity.*

The KNP, overwhelmingly backed in the referendum, is generally supportive of activity in the precisely defined KIC and provides robust protection of residential amenity, particularly outside it.

Policies KBR18 and KBR19 offer strong support for public houses and community uses, subject to caveats.

The KNP supports temporary and pop-up activities, subject to a number of caveats, in the Strategic Cultural Area (see Policy KBR26) in the western end of the KNA.

The Forum is keen to encourage better connection between the cultural institutions and museums and the KIC in branding, communication and physically (see Sections 7 and 13 of this letter).

## 12. ‘Namos’

As you may know, the Namos planning application in Montpelier Street<sup>2</sup> prompted over 250 objections with many highlighting the KNP’s requirement to demonstrate no adverse impact on

---

<sup>2</sup> <https://idoxpa.westminster.gov.uk/online-applications/applicationDetails.do?keyVal=QK1F2URPKRY00&activeTab=summary>

residential amenity (see Policies KBR14C and KBR15C)<sup>3</sup>. The Knightsbridge Association obtained a robust opinion from a leading QC to support this interpretation of the KNP. All three related planning applications were refused at the Planning Sub-Committee on 22 June 2021<sup>4</sup>.

Importantly, two other planning applications<sup>5</sup> and <sup>6</sup> considered at the same Planning Sub-Committee meeting raised ‘Class E’ issues and Westminster’s reports proposed up to 25 planning conditions including Servicing and Operational Management Plans, covers and hours of use etc.

### **13. Arup’s Strategic Vision for the BID**

Thank you for sending us a revised final version of Arup’s Strategic Vision for the BID (dated 28 January 2021).

Arup’s Strategic Vision is excellent in many ways. However, I flagged a number of concerns when commenting on a draft report dated 19 October 2020 on 10 and 11 November 2020. I would like to reiterate a number of them here.

In addition to the KNP, the Knightsbridge Management Plan (KMP)<sup>7</sup> identified a large number of priorities including many requested by residents. While many have been completed, partly or fully, a number are inevitably ongoing e.g. the need to keep the area clean and safe.

Important or ongoing priorities and concerns for residents include:

- a. Keenness to preserve and enhance the status of the KIC and address the tattiness and collateral impacts of the changing commercial activities in it.
- b. Complying with legal limits and the latest World Health Organisation guidelines for air quality.
- c. Addressing noise and speeding from motorcycles and supercars.
- d. Encouraging drivers, cyclists and pedestrians travelling to or through Knightsbridge to use the arterial roads not residential streets. Rat-running is a problem in some streets.
- e. Using wayfinding to encourage the large numbers of tourists and others visiting the area by public transport or on foot to move between South Kensington, Knightsbridge and Hyde Park Corner along arterial roads rather than loiter in residential areas.
- f. Concerns about café monoculture and crowded and filthy pavements.
- g. Residents have long opposed proposals for the commercialisation of public space including pavements and side streets e.g. street stalls, markets or pop up activities as proposed by RBKC for Montpelier Street. A number of small existing commercial units at the south end of Montpelier Street and near Knightsbridge Green are a constant source of problems and have required dramatic intervention at times e.g. by the Metropolitan Police. Limited exceptions for temporary and pop-up activities are included in Policy KBR26 of the KNP.
- h. Addressing problems with minicabs using resident and other parking space as a ‘staging area’ and anti-social behaviour.

---

3

[https://www.knightsbridgeforum.org/media//documents/knp\\_made\\_version\\_december\\_2018\\_131218\\_website.pdf](https://www.knightsbridgeforum.org/media//documents/knp_made_version_december_2018_131218_website.pdf)

<sup>4</sup> <https://committees.westminster.gov.uk/ieListDocuments.aspx?Cid=167&Mid=5650&Ver=4>

<sup>5</sup> <https://committees.westminster.gov.uk/documents/s42512/ITEM%2002%20-%20QUEENS%20COURT%20QUEENSWAY%20LONDON%20W2%204QN.pdf>

<sup>6</sup> <https://committees.westminster.gov.uk/documents/s42520/ITEM%2010%20-%201-3%20MOUNT%20STREET%20LONDON%20W1K%203NB.pdf>

<sup>7</sup> [https://www.knightsbridgeforum.org/media//documents/kmp\\_december\\_2018\\_141218\\_website.pdf](https://www.knightsbridgeforum.org/media//documents/kmp_december_2018_141218_website.pdf)

- i. Addressing problems caused by taxis in side streets.
- j. Not extending Sunday opening hours.
- k. Removing litter bins from residential areas – which attract illegal dumping of rubbish and pests like a magnet – and opposing new seating in the residential areas to reduce anti-social behaviour.
- l. Encouraging the responsible use of private garden squares, roof terraces and other private outside space by their owners. This includes discouraging larger groups of visitors.

In general, residents consider there is too much ‘connection’ between residential areas and Brompton Road and Knightsbridge (i.e. the road), in particular collateral impacts from commercial activities and tourists, rather than ‘not enough’.

A number of these points conflict with proposals in Arup’s Strategic Vision, as do others in sections 3 and 7 of this letter, and illustrate areas of potential conflict between the Forum and BID. We are keen to avoid conflict by being clear about residential “red lines”, priorities and concerns, many of which are shared by the Forum.

## **Governance**

### ***14. BID governance***

The Forum supports the Knightsbridge Association’s request for them to represent residents through a seat on the BID board (as they requested in July 2019) and recommends that this is enshrined in the constitution of the BID.

We are unclear how the legal and governance arrangements of the Brompton Road BID Board will work if its role is to focus only on the delivery and fulfilment of objectives set by a Strategy Board and Company above it. Is this similar to the structure used by the Heart of London Business Alliance within one borough?

## **Other issues**

- 15. The Forum would welcome the opportunity to work with the BID to identify priority projects that could transform the KIC and wider KNA including addressing the matters raised in this letter.
- 16. Please number the pages of the Business Plan. There a small number of typos which I am sure your team will spot e.g. cataclysm.

In summary, the Forum is pleased to confirm its support, in principle, for the Brompton Road BID subject to a number of important caveats in relation to Arup’s Strategic Vision (see Section 13 above). As you will understand, the Forum is unlikely to support and may oppose proposals that conflict with the objectives, policies and/or actions in the KNP and/or the KMP affecting the KNA. We are keen to ensure that there is no misunderstanding of our position on these issues before you finalise your governance arrangements and Business Plan and commence your ballot processes.

Good luck with next steps. The Forum is keen to see the BID established and would warmly welcome frequent dialogue between us so that the Knightsbridge community can work together towards common objectives and the short, medium and long-term improvement of Knightsbridge. There is no shortage of opportunities!

Yours sincerely

Simon Birkett  
Chair  
Knightsbridge Neighbourhood Forum