## KNIGHTSBRIDGE NEIGHBOURHOOD FORUM









# Knightsbridge Neighbourhood Plan 2017 – 2037

Strategic Environmental Assessment Screening Report

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**Appendix:** Statutory Designations

## 1 INTRODUCTION

- 1.1 This screening report is designed to determine whether or not the content of the Knightsbridge Neighbourhood Plan (the KNP, Neighbourhood Plan or Plan) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- **1.2** The Neighbourhood Plan covers a 20-year period from 2017 to 2037.
- **1.3** The designated Knightsbridge Neighbourhood Area (the Area, KNA or Neighbourhood Area) is shown in Figure 1.1.

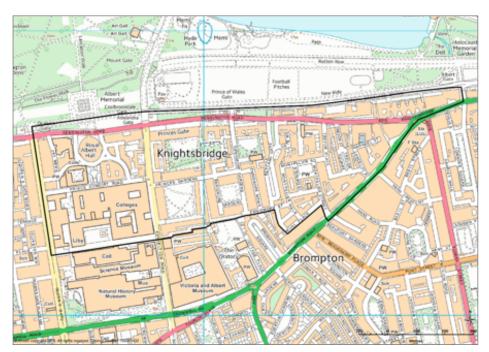


Figure 1.1: Knightsbridge Neighbourhood Area

- 1.4 The purpose of the Knightsbridge Neighbourhood Plan is to provide for the sustainable development of Knightsbridge and to make it the best residential and cultural place in London in which to live, work, study and visit. It seeks to do this through a range of objectives and policies that sit under five themes:
  - Character
  - Community
  - Culture and education
  - Public spaces and utilities
  - Healthy environment and healthy people

#### **1.5** The objectives are:

#### Character

- 1.0 Enhance the special character of Knightsbridge including its architecture, heritage, townscape and trees while recognising its status internationally as a prime residential neighbourhood and centre for retail, culture and education
- 2.0 Improve the public realm and enhance and restore heritage features
- 3.0 Protect and enhance Hyde Park and Kensington Gardens Metropolitan Open Land (MOL) including the Hyde Park Barracks land.

#### Community

- 4.0 Promote the sense of community
- 5.0 Protect and enhance existing residential amenity and mix

#### **Culture and education**

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

#### Public spaces and utilities

- 7.0 Enable active travel and personal mobility
- 8.0 Encourage superb public transport
- 9.0 Encourage superb utilities and communications infrastructure

## Healthy environment and healthy people

- 10.0 Be an exemplar in sustainable city living by complying fully with international laws, standards, guidelines and best practice
- 1.6 The legislative background set out below outlines the regulations that require this screening exercise. Section 4, provides a screening assessment of the likely significant environmental effects of the Neighbourhood Plan and whether there is the need for an SEA.

## 2 LEGISLATIVE BACKGROUND

- 2.1 European Union Directive 200142/EC requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) require that this is determined by a screening process, which should use a specified set of criteria (set out in Schedule 1 of the Regulations). The results of this process must be set out in an SEA Screening Statement, which must be publicly available.
- 2.2 In accordance with Regulation 9 of the SEA Regulations 2004, the Knightsbridge Neighbourhood Forum (the qualifying body) (the Forum, KNF or Neighbourhood Forum) has requested Westminster City Council (WCC), as the responsible authority, to consider whether an environmental report on the emerging Knightsbridge Neighbourhood Plan is required due to significant environmental effects. In making this determination, WCC should have regard to Schedule 1 of the Regulations.
- 2.3 The draft Neighbourhood Plan has completed the pre-submission stage and further consultation with relevant statutory consultees is being undertaken by the Forum. In line with the advice contained within the National Planning Policy Framework (NPPF), Planning Practice Guidance, the plan's potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. The Forum is therefore consulting the statutory consultees (Historic England/Natural England/Environment Agency) and Westminster City Council on whether an environmental report/SEA is required.
- An SEA can be required in some limited situations where a sustainability appraisal is not needed; Neighbourhood Planning is one of these situations. Sustainability Appraisals (SAs) may incorporate the requirements of the Strategic Environmental Assessment Regulations, which implement the requirements of the 'Strategic Environmental Assessment Directive' on the assessment of the effects of certain plans and programmes on the environment.
- 2.5 A sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues and it is good practice to do one to understand how a plan is to deliver sustainable development. However, NPPF Planning Practice Guidance states that there is no legal requirement for a neighbourhood plan to undertake a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. It is down to the qualifying body to demonstrate whether its plan is likely to have significant environmental effects. This is the purpose of this SEA Screening Report.

## 3 CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS REFERRED TO IN ARTICLE 3(5) OF DIRECTIVE 2001/42/EC

- 3.1 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below:
  - 1. The characteristics of plans and programmes, having regard, in particular, to:
  - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
  - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
  - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
  - environmental problems relevant to the plan or programme,
  - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to wastemanagement or water protection).
  - 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
  - the probability, duration, frequency and reversibility of the effects,
  - the cumulative nature of the effects,
  - the trans-boundary nature of the effects,
  - the risks to human health or the environment (e.g. due to accidents),
  - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
  - the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage,
  - exceeded environmental quality standards or limit values,
  - intensive land-use,
  - the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive 2001/42/EC

## 4 AREA CHARACTERISTICS

**4.1** This section summarises the range of issues that must be considered as part of the SEA screening process.

## Area, population and health

- **4.2** The Neighbourhood Area covers a total of approximately 52 hectares or 0.52 square kilometres.
- 4.3 The 2011 Census recorded a population of just below 4,700 usual residents. Levels of deprivation are extremely low and overall health is good, as shown in Figure 4.1.

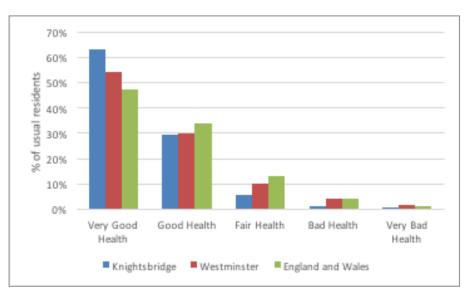


Figure 4.1: General health levels, 2011

Source: 2011 Census

#### **Biodiversity, Flora and Fauna**

- 4.4 Westminster borough has a diverse ecology which is also present in the Neighbourhood Area and the area that surrounds it, particularly Hyde Park. Priority species include:
  - Birds: House Sparrow (breeding), Tawny Owl (breeding)
  - Invertebrates: Buttoned Snout Moth
  - Mammals: bats (all species), hedgehogs
- 4.5 Habitats include open spaces (including the Garden Squares), neighbouring Hyde Park and Kensington Gardens, standing open water (in the neighbouring Serpentine), veteran trees, built environment and private gardens.
- **4.6** Figure 4.2 shows that, within the Neighbourhood Area, there are some areas of deciduous woodland, being some of the garden squares. These are priority habitats, as are the other small squares to the south and east of the Area.
- 4.7 Adjacent to the boundary of the Neighbourhood Plan area, Hyde Park is a Woodpasture and Parkland BAP Priority Habitat.

**4.8** Tree Sparrows, Redshanks and Yellow Wagtail birds have their habitats close to but not in the Neighbourhood Area.



Figure 4.2: Biodiversity features in and close to the Neighbourhood Area

Source: MAGIC, DEFRA

- 4.9 The neighbouring Hyde Park, as well as the green spaces in the Neighbourhood Plan Area, provide valuable functions in terms of accommodating wildlife and have a role in ameliorating pollution.
- **4.10** However, the majority of the Neighbourhood Area is considered to be deficient in access to biodiversity<sup>1</sup>.

#### Soil

**4.11** There is no agricultural land in or in close proximity to the Neighbourhood Area.

#### Water

- **4.12** The Neighbourhood Area is not in or close to flood zones 2 or 3.
- 4.13 As shown in Figure 4.3, part of the Neighbourhood Area is within a Groundwater Source Protection Zone. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk.

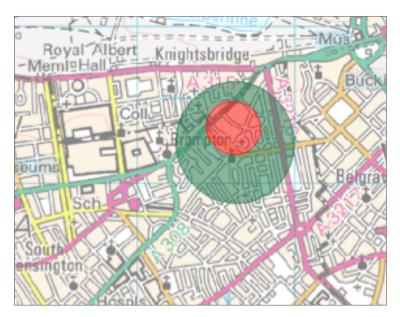


Figure 4.3: Groundwater source protection zone

Source: Environment Agency (red = inner zone, green = outer zone)

#### **Air**

- **4.14** Westminster has some of the poorest air quality in the United Kingdom with concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>2.5</sub> and PM<sub>10</sub>) regularly exceeding guidelines which are set by the World Health Organisation (WHO) to protect human health. As a result, the whole of Westminster, including the Neighbourhood Area, has been designated an Air Quality Management Area.
- Figure 4.4 illustrates the extent of air pollution across the Neighbourhood Area. Levels along Brompton Road, Knightsbridge, Kensington Gore and Kensington Road and at Scotch House Corner clearly significantly exceeded the WHO's guideline of 40 micrograms per cubic metre (ug/m³) for annual mean NO₂ in 2013.
- 4.16 Annual mean and hourly concentrations of NO<sub>2</sub> in Brompton Road also far exceed the limit values in the Air Quality Standards Regulations 2010 and Directive 2008/50/EC on ambient air quality and cleaner air for Europe which have been in legislation since 1999 to be achieved by 1 January 2010. For example, annual mean concentrations of NO<sub>2</sub> in Brompton Road were 80 micrograms per cubic metre (ug/m³) in the year ended 31 December 2016 compared with the legal limit of 40 ug/m³. In addition, there were 262 exceedances of the NO<sub>2</sub> hourly limit value in the same period compared with the legal limit of 18².



Figure 4.4: Modelled annual mean  ${
m NO_2}$  air pollution, 2013 Source: London Air Quality Network, used with permission from the GLA and TfL

#### **Material assets**

**4.17** There is no existing or historic landfill in or close to the area and no mining activity.

## **Cultural heritage**

- **4.18** The Neighbourhood Area has 175 listed buildings or structures, as shown in Figure 4.5. The split of these buildings is as follows:
  - Grade I 2 buildings/structures
  - Grade II 169 buildings/structures
  - Grade II\* 4 buildings/structures



Figure 4.5: Listed buildings Source: MAGIC, DEFRA

- 4.19 None of these buildings are on the register of Buildings at Risk. The two Grade I listed buildings are the Holy Trinity Church on Prince Consort Road and the Royal Albert Hall. There are a number of listed buildings close the Neighbourhood Area boundary but none are on the register of Buildings at Risk.
- **4.20** Much of the area is covered by the four Conservation Areas shown in Figure 4.6.

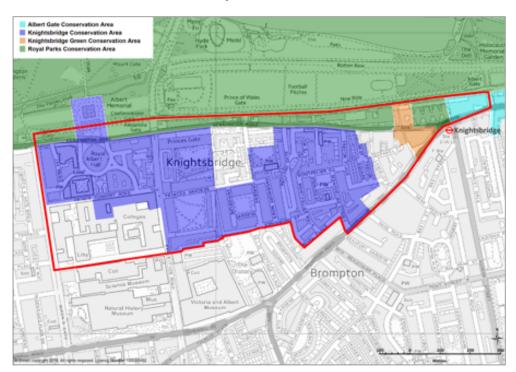


Figure 4.6: Conservation Areas

N.B. A small part of the Royal Parks Conservation Area (not shown) also within the northern boundary of the Neighbourhood Plan Area

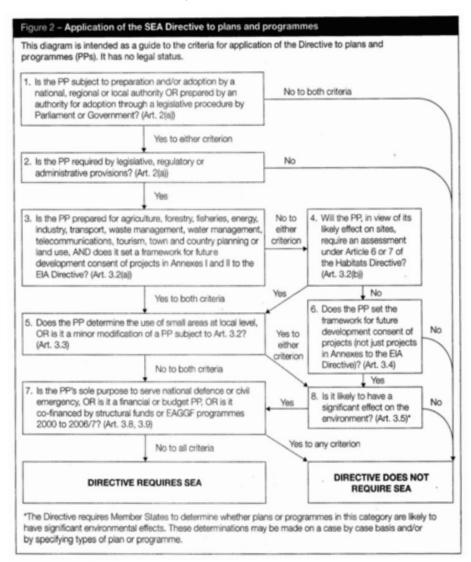
- 4.21 The Neighbourhood Area adjoins other nationally important assets including Hyde Park and Kensington Gardens, which are Grade I registered parks and gardens and also several Grade I listed buildings such as the Victoria and Albert Museum.
- 4.22 The Neighbourhood Area has no archaeological records but Hyde Park is registered as a Heritage Environmental Record (HER) due to the presence of a 17th century fair. In addition, Hyde Park/Kensington Gardens is registered as an Archaeological Priority Area (APA 2.3) and there is part of the Kensington and Chelsea Cemeteries APA to the south of the Neighbourhood Area (APA 2.5).

#### Landscape

**4.23** The Neighbourhood Area is in the Inner London National Character Area (NCA). Hyde Park is identified as a notable feature but nothing specifically within the Neighbourhood Area.

## 5 ASSESSMENT

5.1 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required:



The table below assesses in broad terms whether the Neighbourhood Plan will require a full SEA. The questions below are drawn from the previous diagram which sets out how the SEA Directive should be applied.

Stage	Y/N	Reason
1. Is the Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation and adoption of the Plan is allowed under The Town and Country Planning Act 1990 as amended by the Localism Act 2011 and the Neighbourhood Planning Act 2017. The Plan is being prepared by Knightsbridge Neighbourhood Forum (as the 'relevant body') and will be 'made' by Westminster City Council as the local authority subject to passing an independent examination and community referendum. The preparation of neighbourhood plans is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 (as amended) and the Neighbourhood Planning (referendums) Regulations 2012.
2. Is the Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	Whilst the Neighbourhood Plan is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will if 'made', forming part of the statutory Development Plan for the Borough. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether a full SEA is required under the Directive.
3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	Neighbourhood plans can cover some of the topics identified in this list and they could set the framework for development of a scale that would fall under Annex II of the EIA Directive. However for neighbourhood plans, developments which fall under Annex I of the EIA Directive are 'excluded development' as set out in Section 61k of the Town and Country Planning Act 1990 (as amended by the Localism Act).
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	A screening assessment for a Habitats Regulations Assessment (HRA) has been prepared separately. An HRA Screening Report prepared on the April 2017 draft of the Plan was sent to WCC and Natural England. Both parties stated that, in their opinion, an HRA was not needed. Revisions to the Plan have resulted in an update to the HRA Screening Report and this is being re-consulted on with Natural England and WCC. However, the opinion in the updated HRA Screening Report that an HRA is not required is still the same.
5. Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The Plan identifies specific uses for the Hyde Park Barracks land within the Neighbourhood Area, including housing, retail, employment and community uses. This site is already identified as a Strategic Housing Site in the Westminster City Plan.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	The Neighbourhood Plan is to be used by Westminster City Council in helping determine future planning applications. The Neighbourhood Plan however focuses on shaping how development comes forward.

Stage	Y/N	Reason
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	The environmental designations have been identified further in the Knightsbridge baseline information in Section 4 and in the Appendix, which includes maps, distances and vulnerability.
		The Plan is not considered to have significant effects on the environment. Any likely effects are related to the objectives of the Plan in respect of generally protecting and enhancing the Neighbourhood Area and are not considered to be significant. The assessment of likely effects is shown in Table 5.1.

## Assessment of likely significant effects

- Under criterion 8 of the assessment in the table above, it was concluded that a Neighbourhood Plan may have a significant effect on the environment depending on the proposals within it and that a case by case assessment was required. The criteria for undertaking such an assessment are drawn from Article 3.5 of the SEA Directive and set out in Section 3 of this report. Table 5.1 outlines the results of this assessment.
- 5.4 It should be noted that, where a policy in the Plan (notated with the prefix 'KBR') is not specifically identified in Table 5.1, it has been assessed as not having an environmental effect.

Table 5.1: Assessment of likelihood of significant effects on the environment

#### Significant effect criteria

#### **Assessment**

1. The characteristics of the plans, having regard to:

a. the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources; The Plan provides a framework for development on the Hyde Park Barracks land (KBR14), a Strategic Housing Site allocated in the Westminster City Plan. Specifically, the policy addresses the scale of development, seeking to ensure that the bulk, height and mass of development is in keeping with the surrounding area and does not have an unacceptable effect on the adjacent Hyde Park and Kensington Gardens, these being registered parks and gardens. Overall, development is likely to have a negative effect in respect of these matters but this is not considered to be significant. This is because the effect of strategic residential development on the Hyde Park Barracks site has been assessed through the Sustainability Appraisal of the Westminster City Plan which includes the Barracks a Strategic Housing Site.

The Neighbourhood Plan also guides development within the Neighbourhood Stress Area (Policy KBR15), the International Shopping Centre (KBR18) and the Strategic Cultural Area (KBR26 and 27), and at 1 Knightsbridge Green (KBR21) and along 'Local Roads' (KBR29). It therefore sets the framework for the nature of development projects in these locations which will have positive effects, although these are not likely to be significant. This is because the amount of development is likely to be small.

There is therefore the potential for both positive and negative effects on the environment resulting from proposals and projects identified in the Plan. However, neither the positive effects nor the negative effects are considered likely to be significant. This is particularly the case given that the Plan does not allocate any specific sites for development.

b. the degree to which the plan influences other plans and programmes including those in a hierarchy; A neighbourhood plan must be in general conformity with the strategic policies of the City Plan for the London Borough of Westminster and the London Plan. It does not influence other plans.

Due to the fact that it does not directly influence any other plans or programmes, the Plan is unlikely to have a significant positive environmental effect or a significant negative environmental effect on the implementation of those plans or programmes.

#### Significant effect criteria

c. the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development;

#### **Assessment**

A neighbourhood plan is required to contribute to the achievement of sustainable development and therefore the likelihood of significant effects on the environment should be minimised through the policy framework.

The Plan includes policies that seek to positively address a number of environmental aspects of sustainable development. The natural environment – specifically biodiversity, air pollution and the protection of natural resources – is addressed through the encouragement of urban greening (KBR11), protection of local green spaces (KBR12), encouraging the minimisation of motor vehicle use (KBR31), promoting electric vehicle infrastructure (KBR32), minimisation of air pollution (KBR35), maximisation of renewable energy (KBR36), retrofitting of historic buildings for energy efficiency (KBR37), enhancing the natural environment (KBR38), protection and management of trees (KBR39) and sustainable use of water resources (KBR40). All these policies will have positive effects but the limited scale of development means that these will not be significant.

The Plan has a positive effect on the heritage environment through policies that address character, design and materials (KBR1), boundary railings and walls (KBR3), public realm and heritage features (KBR4) and local buildings and structures of merit (KBR6). The limited scale of development means that these will not be significant.

The Plan also has a positive effect on human (social) aspects of the environment through policies that address noise – healthy people (KBR41) and night-time and early morning uses in or adjacent to residential areas (KBR16) – and general amenity within an urban environment – neighbourhood stress area (KBR15). The limited scale of development means that these will not be significant.

These policies are considered to have a positive effect on the Neighbourhood Area's environment (natural, heritage and human aspects of the environment) in terms of promoting sustainable development. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant.

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### Significant effect criteria **Assessment** Development as a result of the policy for the Hyde Park Barracks (KBR14) could result in a number of different uses which could have a negative effect on the environment. The redevelopment of the site could increase the built area and therefore have a negative effect on biodiversity although this is unlikely to be significant because the immediate surroundings of the existing built up area are not identified as being rich in species or habitats. Any negative effect on biodiversity could also be contributed to by increased footfall through the site, although the presence of existing pedestrian routes between Hyde Park/Kensington Gardens and the Neighbourhood Area close to the site mean this is unlikely to be significant in terms of its additional effect. Possible negative effects such as noise, air pollution and habitat loss are required by KBR14 to be judged on their effect on the tranquillity of the Neighbourhood Area's Metropolitan Open Land (MOL) which ensures that any detrimental environmental effects are mitigated. The development of more energy efficient buildings than presently exist on the site would have positive environmental effects although the scale of growth is such that this is unlikely to be significant in terms of the effect on the environment. It is considered that the Neighbourhood Plan policies relating to redevelopment of the Hyde Park Barracks land are likely to have both positive effects and negative effects on the environment of the Neighbourhood Area and the adjacent Hyde Park/ Kensington Gardens but neither of these types of effect are likely to be significant. Such matters have already been considered through the sustainability appraisal of the Westminster City Plan and the Neighbourhood Plan does not identify any other additional uses. The environmental effect of some proposals within the Plan d. environmental problems relevant are likely to be negative but such effects are not likely to be to the plan; significant due to the scale of development proposed – only the policies relating to the Hyde Park Barracks land (KBR14) and 1 Knightsbridge Green (KBR21) address development at specific sites and both are below the Environmental Impact Assessment Regulations thresholds for urban development projects. Moreover, the principle of strategic residential development on the Hyde Park Barracks site has been established by its identification in the Westminster City Plan as a Strategic Housing Site. Policy KBR14 ensures that the bulk, height and mass of development is in keeping with the surrounding area and does not have a significant negative effect on the adjacent Hyde Park and Kensington Gardens, these being registered parks and gardens. It is considered that the policies relating to redevelopment of the Hyde Park Barracks land will have a negative effect on the environment of the Neighbourhood Area and the adjacent Hyde Park/Kensington Gardens but this effect is not likely to be significant. Continued on next page...

#### Significant effect criteria **Assessment** Any existing environmental problems could be tackled through the implementation of the Neighbourhood Plan and there are a number of policies which seek to do this and thereby have a positive environmental effect - encouragement of urban greening (KBR11), designation of local green spaces (KBR12), encouraging the minimisation of motor vehicle use (KBR31), promoting electric vehicle infrastructure (KBR32), minimisation of air pollution (KBR35), maximisation of renewable energy (KBR36), retrofitting of historic buildings for energy efficiency (KBR37), enhancing the natural environment (KBR38), protection and management of trees (KBR39) and sustainable use of water resources (KBR40). However, the likely scale of development in the Neighbourhood Area means that such effects are not likely to be significant. These policies are considered to have a positive effect on the environment of the Neighbourhood Area in terms of addressing environmental problems. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant. The Neighbourhood Plan has to be in conformity with the e. the relevance of the plan or City Plan and London Plan. The City Plan and London Plan programme for the implementation both have regard to European Union (EU) legislation on the of Community legislation on environment and therefore the Neighbourhood Plan already the environment (e.g. plans and meets the requirements of this legislation. programmes linked to wastemanagement or water protection). The Neighbourhood Plan, in its preparation, has taken into account the following EU legislation and strategies: • EU Habitats and Conservation of Wild Birds Directives (92/43/EEC and 79/409/EEC) • EU Water Framework Directive (2000/60/EC) • EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC) • EU Waste Directive (2008/98/EC) • EU Thematic Strategy on Air Pollution Europe 2020: A strategy for smart, sustainable and inclusive Many of the policies in the Neighbourhood Plan will make a positive contribution towards the achievement of the targets in this legislation and these strategies, so therefore will have a positive environmental effect. This particularly includes policies on household and commercial waste consolidation (KBR22), motor vehicle use (KBR31), electric vehicle infrastructure (KBR32), utilities infrastructure (KBR34), healthy air (KBR35), minimisation of air pollution (KBR35), maximisation of renewable energy (KBR36), retrofitting of historic buildings for energy efficiency (KBR37), enhancing the natural environment (KBR38), protection and management of trees (KBR39) and sustainable use of water resources (KBR40). However, the likely scale of development in the Area means that such positive effects are not likely to be significant.

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Significant effect criteria	Assessment
	The policies in the Plan are likely to have a positive effect on the environment of the Neighbourhood Area in terms of their contribution towards the implementation of Community legislation on the environment. However, this effect is not likely to be significant. This is particularly the case given the size of the area and the likely scale of new development.
2 Characteristics of the effects an	nd of the area likely to be affected, having regard, in particular, to:

a. the probability, duration, frequency and reversibility of the effects,

Development is proposed within the Plan and therefore there will be some negative effects of environmental change that will take place. All of this development is likely to be on previously developed land so there will be no loss of green space or agricultural land - therefore any negative effects will not be significant. Policy KBR12 will protect existing local green spaces in the Neighbourhood Area. In addition, policies relating to urban greening (KBR11) and enhancing the natural environment (KBR38) seek to incorporate biodiversity features into new development with the intention of enhancing the local environment and thereby having a positive effect. Such positive effects are not likely to be significant.

The Plan is considered to have both positive effects and negative effects on the environment of the Neighbourhood Area in terms of the probability, duration, frequency and reversibility of the effects. However, given the size of the area and the limited likely scale of new development, none of these types of effect are considered likely to be significant.

Development on the Hyde Park Barracks land (KBR14) could intensify the use of the site compared with the existing use. Redevelopment, based on the requirements of the policy, would increase the footfall through the site - and particularly to Hyde Park and Kensington Gardens - although the overall negative environmental effect on biodiversity compared with the existing use is not likely to be significant. Other types of use would also increase footfall but would be associated with new built development on the site. Any possible negative effects such as noise, air pollution and habitat loss are required by KBR14 to be judged on their effect on the tranquillity of the Neighbourhood Area's MOL which would mean that the probability, duration and frequency of any negative environmental effects would not be significant.

It is considered that the Neighbourhood Plan's policies relating to redevelopment of the Hyde Park Barracks are likely to have a negative effect on the environment of the Neighbourhood Area and the adjacent Hyde Park/ Kensington Gardens in terms of the probability, duration, frequency and reversibility of the effect. However, the scale of development and the need for development proposals to protect the tranquillity of the Neighbourhood Area's MOL mean that this effect is not likely to be significant.

#### Significant effect criteria **Assessment** b. the cumulative nature of the The cumulative effects of proposals within the Plan are unlikely to be significant on the local environment. In addition, there effects. are no proposals or policies within the Westminster City Plan which, in combination with the Plan, create the potential for any more significant widespread cumulative effects. KBR14 in respect of development on the Hyde Park Barracks land does allow the possibility of additional uses to the housing in the Westminster City Plan strategic allocation but any possible negative effects such as noise, air pollution and habitat loss are required by KBR14 to be judged on their effect on the tranquillity of the Neighbourhood Area's MOL which would mean that they would not be significant. The Plan includes policies that seek to have a positive effect on the environmental aspects of sustainable development - specifically, encouragement of urban greening (KBR11), designation of local green spaces (KBR12), encouraging the minimisation of motor vehicle use (KBR31), promoting electric vehicle infrastructure (KBR32), minimisation of air pollution (KBR35), maximisation of renewable energy (KBR36), retrofitting of historic buildings for energy efficiency (KBR37), enhancing the natural environment (KBR38), protection and management of trees (KBR39) and sustainable use of water resources (KBR40). These policies are likely to have a positive effect but the limited nature of development likely in the Neighbourhood Area mean that their effect will not be significant. It is considered that the policies in the Plan are likely to have a positive cumulative effect on the environment of the Neighbourhood Area and the surrounding area. However, given the size of the area and the limited likely scale of new development, such cumulative effects are not considered likely to be significant. As Knightsbridge is within a major built-up area and the c. the transboundary nature of the effects, Area boundary abuts the borough boundary with the Royal Borough of Kensington and Chelsea (RBKC) in places, the proposals within the Plan have the potential to have an effect on neighbouring areas. Policy KBR14, concerning development on Hyde Park Barracks land, is on land adjacent to Hyde Park and Kensington Gardens (registered parks and gardens) so could have a negative effect, but the policy seeks to ensure development mitigates the effect on the Park as an area of Metropolitan Open Land. As such, it is unlikely to be significant. It is considered that the policies relating to redevelopment of the Hyde Park Barracks are likely to have a negative effect on the environment of the adjacent Hyde Park/ Kensington Gardens but this effect is not likely to be significant. Continued on next page...

#### Significant effect criteria

#### **Assessment**

The part of the Strategic Cultural Area that is within the Neighbourhood Area is adjacent to the RBKC boundary, so Policies KBR26 and KBR27 on the Strategic Cultural Area could have positive or negative effects across the boundary. The positive effects would consist of slowing traffic speeds, vehicle emissions and road congestion. The negative effects would arise from increased footfall. However, these effects are not considered to be significant on the wider Strategic Cultural Area because these policies encourage uses to be in keeping with the existing established roles of the area and do not promote significant scales of growth. In particular, proposals relating to improved access to the Albert Memorial, being a significant heritage asset adjacent to the Neighbourhood Area boundary, are expected to increase footfall but also slow traffic speeds, vehicle emissions and road congestion. However, the likely scale of both of these types of effect would not be significant. The policies may also increase footfall to the Royal Albert Hall, a Grade I listed building of significance within the Neighbourhood Area and the Victoria and Albert Museum just outside the Area, but again, are not expected to increase footfall to such a degree that it would have a significant negative effect.

It is considered that the policies relating to the Strategic Cultural Area are likely to have both a positive effect and negative effect on the environment of the adjacent Hyde Park/ Kensington Gardens and on the heritage assets of the Albert Memorial and the Royal Albert Hall, as well as nearby heritage assets such as the Victoria and Albert Museum. However, none of these effects are likely to be significant.

The following policies will have a positive environmental effect although this is not likely to be significant:

- the Neighbourhood Stress Area (KBR15), where the negative effects of uses such as noise are expected to be mitigated;
- International Shopping Centre (KBR18) which seeks to maintain the existing retailing function; and
- along 'local roads' (KBR29) where the policy seeks to encourage and enable increased use by pedestrians and cyclists before motorists.

These policies are likely to have a positive environmental effect on the areas immediately adjacent to the Neighbourhood Area. However, given the size of the Area and the limited likely scale of new development within it, such effects are not considered likely to be significant. There are not considered to be any wider effects further beyond these immediate areas.

#### Significant effect criteria **Assessment** d. the risks to human health or the There is limited risk to human health or the environment as a environment (e.g. due to accidents), result of the development being proposed. Policies relating to safe pedestrian and cycle movement (KBR8, 28-30), noisy uses (KBR15 and 16), construction activity (KBR23), encouraging the minimisation of motor vehicle use (KBR31), air pollution (KBR35) and healthy people (KBR41) seek to enhance people's health and safety in a busy urban environment, thereby having a positive effect. However, the scale of development in the Area means that such effects are not likely to be significant. These policies are expected to have a positive environmental effect on the Neighbourhood Area in terms of human health. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant. The Neighbourhood Plan area covers just 0.52km<sup>2</sup> and has e. the magnitude and spatial extent approximately 4,700 residents. This is just 2.4% of the area of of the effects (geographical area and the City of Westminster and 2.1% of its population. size of the population likely to be affected), The scale of development specifically proposed by the Neighbourhood Plan is small and therefore the potential for environmental effects is also likely to be particularly limited and localised in terms of its effect on the population. Some of the policies such as the Neighbourhood Stress Area (KBR15) and International Shopping Centre (KBR18) will have a positive effect on visitors to the Area although these will not be significant in terms of their environmental effect. The Neighbourhood Plan does not allocate any sites for development and only addresses one development site of significance, the Hyde Park Barracks. The negative effects of this development, given that the site is already previously developed and currently in use and given that it sits within a well built-up area, means that any effect will be localised and not significant. It is likely that both the positive effects and negative effects of the proposals within the Plan will be limited in magnitude and spatial extent. It is therefore considered that neither the positive effects nor the negative effects on the environment of the Neighbourhood Area are likely to be significant. The Plan seeks to enhance the natural environment and the f. the value and vulnerability of the cultural heritage of the area through many of its policies. The area likely to be affected due to: broad environmental characteristics of the area are in section 4 of this report. special natural characteristics or cultural heritage, Continued on next page...

#### Significant effect criteria

#### **Assessment**

In relation to the natural environment, the area is predominantly built up, with small pockets of green space provided by the garden squares. These are not designated as nationally or internationally important. Policies covering encouragement of urban greening (KBR11), designation of local green spaces (KBR12), minimisation of air pollution (KBR35), maximisation of renewable energy (KBR36), retrofitting of historic buildings for energy efficiency (KBR37), enhancing the natural environment (KBR38), protection and management of trees (KBR39) and sustainable use of water resources (KBR40), seek to ensure that environmental quality standards are met and the Forum actively seeks to be an exemplar of environmental sustainability within an urban environment. This will have a positive effect although the scale of development expected in the Neighbourhood Area means that such effects will not be significant.

These policies are expected to have a positive effect on the environment of the Neighbourhood Area in terms of its natural characteristics. However, given the size of the area and the limited likely scale of new development, such effects are not considered likely to be significant.

In relation to the historic and cultural heritage, there are many listed buildings in and adjacent to the area and much of the area itself has Conservation Area status. However, there are no buildings at risk in either the Neighbourhood Area or close to its boundary. Policies on character, design and materials (KBR1), boundary railings and walls (KBR3), public realm and heritage features (KBR4) and local buildings and structures of merit (KBR6) seek to enhance the existing heritage assets of the area through good design and use of appropriate materials. There are however some significant heritage assets in and adjacent to the Neighbourhood Area, including in the neighbouring borough of Kensington and Chelsea. In particular, there could be the potential for development close to these highly sensitive heritage assets to have a negative environmental effect on their setting. Primarily these assets are Hyde Park/Kensington Gardens (Grade I registered parks and gardens) and the Royal Albert Hall, Victoria and Albert Museum and Albert Memorial, being Grade I listed buildings. However, the Neighbourhood Plan does not propose any specific development close to these assets. Policies related to the Strategic Cultural Area (Policies KBR26 and KBR27) do not specifically propose development which would have an effect on any of the adjacent heritage assets (the Royal Albert Hall, Victoria and Albert Museum and Albert Memorial). The Plan supports improved access to the Albert Memorial which could have a positive or negative effect on the environment but does not propose built development that could affect its setting. Therefore these environmental effects are not likely to be significant.

Continued on next page...

#### Significant effect criteria **Assessment** exceeded environmental quality It is considered that these policies will have a positive standards or limit values, or negative effect on the cultural heritage or natural environment of the Neighbourhood Area. However, given the limited likely scale and location of new development, such effects are not considered likely to be significant. effect A number of policies concern the meeting environmental quality standards by development. These include: Policy KBR35 – complying with European Union limit values on ambient air quality and World Health Organisation guidelines for ambient and indoor air quality. Policy KBR41 – meeting BREEAM or equivalent ratings of 'excellent or better'. More generally, Policy KBR36 seeks to support the reductions in air emissions required under the Climate Change Act and the Paris Agreement through, for example, the use of low emission boilers in development. intensive land-use, These policies are likely to have a positive effect on the environment but the limited scale of development in the Neighbourhood Area means that the effect will not be significant, particularly given the fact that the policies require development not to breach or therefore exceed environmental quality standards or limit values. These policies are expected to have a positive effect on the the effects on areas or landscapes environment of the Neighbourhood Area. However, none which have a recognised national, community or international of these policies require development to breach or exceed protection status. environmental quality standards or limit values therefore the effects are not considered to be significant. Policy KBR14 on future development on the Hyde Park Barracks land could result in more intensive land use which would have a negative effect. However, the policy ensures that this does not adversely affect the tranquillity of the Neighbourhood Area's MOL and that the bulk, height and mass of development is in keeping with the surrounding area and does not have a negative effect on the adjacent Hyde Park and Kensington Gardens, these being registered parks and gardens. Therefore the effect is not considered to be significant. The policies which may intensify land use are likely to have a negative effect although the scale of development is such that these effects are not likely to be significant. Continued on next page...

Significant effect criteria	Assessment
	There are five European sites within 10km of the Borough of Westminster (see the Appendix for location of sites in relation to Knightsbridge, description of sites and their distances from Knightsbridge). Some areas are covered by more than one designation. All the sites are listed below:  • Wimbledon Common SAC;  • Richmond Park SAC;  • Epping Forest SAC;  • Lee Valley SPA and RAMSAR; and  • Essex Thames Estuaries SAC and RAMSAR.
	Of these five SACs, only Wimbledon Common and Richmond Park are within 10km of Knightsbridge.
	The Neighbourhood Plan focuses, amongst other things, on shaping development, and protecting, maintaining and enhancing existing green space assets. It does not propose specific development sites, but instead provides further local criteria that should be met by any development of the Hyde Park Barracks land (Policy KBR14) and 1 Knightsbridge Green (Policy KBR21).
	Policies that seek to address positively the environmental aspects of sustainable development – specifically, urban greening (KBR11), local green spaces (KBR12), air pollution (KBR35), renewable energy (KBR36), retrofitting historic buildings for energy efficiency (KBR37), enhancing the natural environment (KBR38), trees (KBR39) and sustainable water (KBR40) – are likely to have a positive effect on the SAC/RAMSAR sites. However, because of the location of these sites well away from the Neighbourhood Area, the effect is not likely to be significant.
	The Neighbourhood Plan is likely to have a positive environmental effect on the identified network of protected sites but, given the distance from them, this is not likely to be significant.

#### 6 SEA SCREENING OPINION

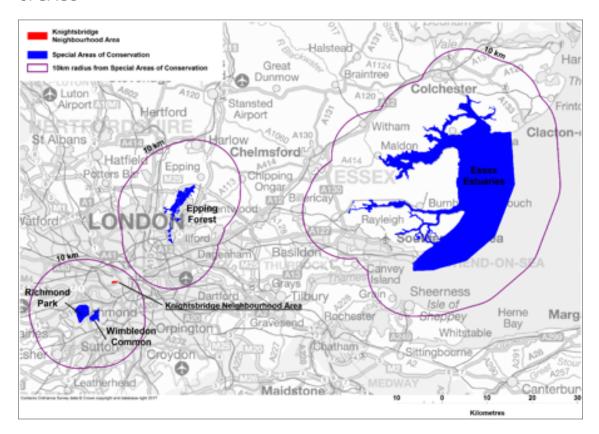
- As a result of the assessment in section 5, it is unlikely there will be any significant environmental effects arising either individually or cumulatively from the draft Knightsbridge Neighbourhood Plan policies. The reasons for reaching this opinion include:
  - i. All the objectives of the Neighbourhood Plan relate to the enhancement and improvement of activities in the Area. Although these objectives are reflected in policies that are likely to have a range of environmental, social and economic benefits, it is not considered likely that these could represent significant environmental effects.
  - ii. The limited scale of the area (0.52km²) and population (4,700 residents) mean that any effects of a Neighbourhood Plan are unlikely to be significant.
  - iii. The Neighbourhood Plan does not allocate any specific sites for development.
  - iv. The only specific sites that are referred to for new development are the Hyde Park Barracks site and 1 Knightsbridge Green. The environmental effect of the development of the Hyde Park Barracks as a Strategic Housing Site has already been considered

- and dealt with through the sustainability appraisal of the Westminster City Plan. Development at 1 Knightsbridge Green where Policy KBR21 would apply relates to the need for the new development rather than the promotion of new development, therefore would not have a significant effect.
- v. Apart from these two sites there is unlikely to be much significant development because much of the Neighbourhood Area has already been developed.
- vi. The Neighbourhood Plan does not propose any specific development close to sensitive natural assets in and adjacent to the Area i.e. Hyde Park/Kensington Gardens, being Grade I registered parks and gardens. The main potential development close to such assets would be at Hyde Park Barracks but the policies in the Plan of relevance to the Barracks (including KBR14) seek to ameliorate the impact of scale, mass and bulk of development which has already been allocated in the Westminster City Plan.
- vii. The Neighbourhood Plan does not propose any specific development close to sensitive heritage assets in and adjacent to the Area i.e. the Royal Albert Hall, Victoria and Albert Museum and Albert Memorial, all being Grade I listed buildings. The Plan supports improved access to the Albert Memorial but does not propose built development which could impact on its setting.
- Any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment at the project application stage.
- As such, it is considered under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004, that the Knightsbridge Neighbourhood Plan does not require an SEA to be undertaken because it is not likely to have significant environmental effects. The outcome of this screening report will be subject to review by Natural England, Historic England and Environment Agency as well as Westminster City Council. The screening report and subsequent screening opinion may also need to be reviewed if significant changes are made to the Neighbourhood Plan following this review.

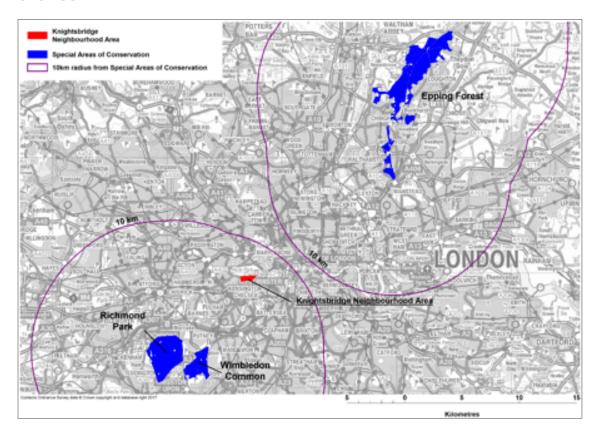
## **APPENDIX - STATUTORY DESIGNATIONS**

Designation relates to, or having the nature of, a statute (such as the Wildlife and Countryside Act, 1981, or the National Parks and Countryside Act, 1949). The NPPF states for plan-making that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: specific policies in this Framework indicate development should be restricted. For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion. See circular 05/2006.

Map showing the location of the Knightsbridge Neighbourhood Area within a 10km radius of SACs



Map showing the location of the Knightsbridge Neighbourhood Area within a 10km radius of SACs



#### **Special Areas of Conservation**

A Special Area of Conservation (SAC) is the land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.

#### Site characteristics and conservation objectives

The following is extracted from the Appropriate Assessment Screening Report for the NPPF revisions to the Westminster Core Strategy in relation to Special Protection Areas (SPAs), Special Areas of Conservation and wetlands of international importance.

#### Wimbledon Common SAC

Location of Wimbledon Common SAC		
Country	England	
Unitary Authority	Merton; Wandsworth	
Grid Ref*	TQ227719	
Latitude	51 25 56 N	
Longitude	00 14 04 W	
SAC EU code	UK0030301	
Status	Designated Special Area of Conservation	
	(SAC)	
Area (ha)	348.31	

<sup>\*</sup> This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.

#### General site character

Inland water bodies (standing water, running water) (1%)

Bogs. Marshes. Water fringed vegetation. Fens (0.5%)

Heath. Scrub. Maquis and garrigue Phygrana (5%)

Dry grassland. Steppes (45%)

Improved grassland (3.5%)

Broad-leaved deciduous woodland (45%)

## Annex I habitats that are a primary reason for selection of this site Not applicable

## Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

4010 Northern Atlantic wet heaths with Erica tetralix

4030 European dry heaths

## Annex II species that are a primary reason for selection of this site 1083 Stag beetle Lucanus cervus

Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle Lucanus cervus, and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy et al. 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.

Annex II species present as a qualifying feature, but not a primary reason for site selection

Not applicable.

#### Richmond Park SAC

Location of Richmond Park SAC		
Country	England	
Unitary Authority	Richmond upon Thames	
Grid Ref*	TQ199728	
Latitude	51 26 27 N	
Longitude	00 16 28 W	
SAC EU code	UK0030246	
Status	Designated Special Area of Conservation	
	(SAC)	
Area (ha)	846.68	

<sup>\*</sup> This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.

#### General site character

Inland water bodies (standing water, running water) (1.5%)

Bogs, Marshes, Water fringed vegetation, Fens (0.5%)

Heath. Scrub. Maquis and garrigue. Phygrana (25%)

Dry grassland, Steppes (18%)

Humid grassland, Mesophile grassland (5%)

Improved grassland (20%)

Broad-leaved deciduous woodland (25%)

Mixed woodland (5%)

## Annex I habitats that are a primary reason for selection of this site

Not applicable

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

Not applicable.

## Annex II species that are a primary reason for selection of this site 1083 Stag beetle Lucanus cervus

Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle Lucanus cervus, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.

Annex II species present as a qualifying feature, but not a primary reason for site selection

Not applicable.

#### **Epping Forest SAC**

Location of Epping Fores	t SAC
Country	England
Unitary Authority	Essex
Grid Ref*	TQ399959
Latitude	51 38 39 N
Longitude	00 01 21 E
SAC EU code	UK0012720
Status	Designated Special Area of Conservation (SAC)
Area (ha)	1604.95

<sup>\*</sup> This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.

#### General site character

Inland water bodies (standing water, running water) (6%)

Bogs. Marshes. Water fringed vegetation. Fens (0.2%)

Heath. Scrub. Maquis and garrigue. Phygrana (3.8%)

Dry grassland. Steppes (20%)

Broad-leaved deciduous woodland (70%)

## Annex I habitats that are a primary reason for selection of this site

9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion)

Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss Zygodon forsteri. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.

## Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

4010 Northern Atlantic wet heaths with Erica tetralix

4030 European dry heaths

#### Annex II species that are a primary reason for selection of this site

#### 1083 Stag beetle Lucanus cervus

Epping Forest is a large woodland area in which records of stag beetle Lucanus cervus are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.

Annex II species present as a qualifying feature, but not a primary reason for site selection

Not applicable.

## SPECIAL PROTECTION AREAS/RAMSAR

#### Thames Estuary and Marshes SPA and RAMSAR site

The Thames Estuary and Marshes SPA includes both marine and terrestrial habitats, and the marine area is also termed a European Marine Site. The marshes extend for around 15 km along the south side of the estuary, and also include some intertidal areas found on the north bank. It encompasses brackish, floodplain grazing marsh ditches and saline lagoons as well as intertidal saltmarsh and mudflat. This site was classified as both an SPA and a Ramsar Site (which covers approximately 5,500 hectares) on 31 March 2000.

The Thames Estuary and Marshes SPA qualifies under Article 4.1 of the EU Birds Directive as it supports internationally important populations of the regularly occurring Annex 1 species avocet and hen harrier. This Site also qualifies as an SPA under Article 4.2 of the EU Birds Directive as it supports internationally important populations of regularly occurring migratory species including Ringed Plover, Grey Plover, Dunlin, Knot, Blacktailed Godwit and Redshank. This SPA site also supports an internationally important assemblage of waterfowl as stated in Section 4.2 of the Directive, which include Gadwall, Shoveler, Tufted duck and Pochard.

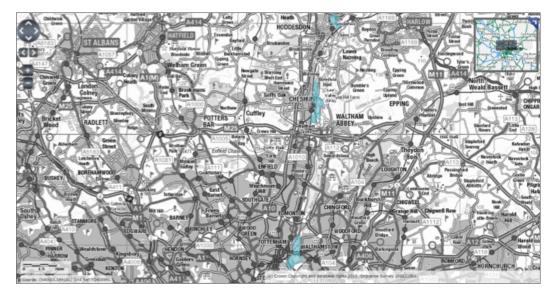
The Thames Estuary and Marshes RAMSAR site qualifies under Criterion 2 as it supports one nationally rare and 14 nationally scarce plant species, as well as one endangered, 10 vulnerable and 12 rare invertebrate species. It also qualifies under Criterion 5 for its internationally important assemblage of waterfowl, and Criterion 6 for its internationally important numbers of over-wintering waterfowl.

The Thames Estuary and Marshes SPA is in the same location as the Essex Estuaries SAC.

#### Lee Valley SPA and RAMSAR site

The Lee Valley SPA is designated for internationally important numbers of breeding and wintering wildfowl, especially Gadwall and Shoveler and for wintering Bittern.

Special Protection Areas within Lee Valley Regional Park include Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits and Walthamstow Reservoirs SSSIs.





Lee Valley SPA