

Neighbourhood Planning
Policy and Strategy
Westminster City Council
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To whom it may concern

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

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

My specific further comments include:

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

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

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



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

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

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

3. KBR23: Construction activity

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

4. KBR35: Healthy Air

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

5. KBR36: Renewable energy

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

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



6. KBR39: Trees

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

7. Objective 7.0 — Enable active travel and personal mobility

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

8. KBR42: Sustainable development and involving people

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

9. Developer contributions (page 78)

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

Part Two

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

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

Yours sincerely

Caroline Russell AM

