

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

Neighbourhood Planning team
Westminster City Council
64 Victoria Street
London SW1E 6QP

By email: neighbourhoodplanning@westminster.gov.uk

21 July 2023

Dear Sir/Madam

Regulation 16 consultation on the draft Belgravia Neighbourhood Plan

Please acknowledge receipt.

I am writing on behalf of the Knightsbridge Neighbourhood Forum (“KNF”) in response to the Regulation 16 consultation on the Belgravia Neighbourhood Plan (“BNP”). Congratulations to the Belgravia Neighbourhood Forum (“BNF”) for producing the BNP which the KNF supports enthusiastically. The KNF has the following specific comments:

1. **Design and character (Policies BEL1 and BEL3):** Well done to the BNF for anticipating the direction of travel of national planning policy in design and character (Policies BEL1 and BEL3). The proposals for design codes are excellent and should ensure that the design of new development reflects the character of Belgravia.
2. **Retrofitting historic buildings for energy efficiency (Policy BEL2):** This policy is excellent and the KNF is pleased to see requirements showing how the policy should be achieved (see 3 below).

In particular, specific reference to achieving zero air emissions locally is welcomed and aligns with the Knightsbridge Neighbourhood Plan (“KNP”). The KNF recommends that the BNP refer to “heritage sensitive slimline” double or triple glazing (see also 3 below). The BNP might also allow other materials for window frames subject to Historic England’s guidance.

Please also consider the implications of the Secretary of State’s recent decision on the Marks and Spencer building in Oxford Street e.g. to put further emphasis on the refurbishment rather than replacement of buildings. One implication is that refurbishment requiring planning permission should always include planning conditions requiring maximum measures to achieve zero air emissions now e.g. because of the Climate Emergency and that the incremental cost now will be less than for a further large-scale retrofit later.

3. **Belgravia Sustainability Charter:** The KNF is very supportive of the inclusion of the Sustainability Charter and its application in Policies BEL1 and BEL14 and Non-Policy Action 1.

The Sustainability Charter could be strengthened through the inclusion of a supporting ‘energy hierarchy’ to inform a number of the specific actions contained within it. This hierarchy could prioritise the approach to minimising energy use as follows:

- a) Insulation and energy efficiency
- b) Provision of renewable energy on site i.e. heritage sensitive solar to maximise resilience
- c) Using excess heat from adjacent or neighbouring buildings
- d) Linking sites up to wider heat networks
- e) Installing air source heat pumps or ground source heat pumps onsite
- f) Using electricity generated from off-site renewable sources to meet residual requirements.

Please check the wording of point 7 which reads oddly. The KNF encourages the use of all-electric boilers, induction stoves and ovens i.e. to achieve zero air emissions.

Please consider the KNP’s wording on ‘Sustainable water’ which goes further than SUDS.

The Sustainability Charter should include reference to indoor air quality as highlighted by the Chief Medical Officer in his Annual Report on Air Pollution (published on 8 December 2022). In this regard, the KNF commends the new British Standard BS 40102-1:2023 and compliance with the World Health Organisation’s new air quality guidelines which apply in ambient and indoor air.

4. **Building refurbishment and enlargement and local construction activity (Policy BEL4 and Non-Policy Action 4):** The impact of construction is an issue common to the residential areas of Knightsbridge and Belgravia and so the BNP’s approach is supported.

Given the large number of building refurbishments and small-scale extensions that occur in Belgravia, the KNF is pleased to see inclusion in Non-Policy Action 4 of encouragement for Level 3 projects to meet the key requirements of Level 2 projects. The BNP may wish to go further than ‘encourage’. The KNF is also pleased to see the addition of best practice guidance on construction standards and procedures and that this aligns with the equivalent guidance supporting the KNP.

Please require construction to mitigate and minimise all air emissions (i.e. not only dust) such as through the use of electric or hydrogen powered construction equipment unless this is not available.

5. **Shopfronts and advertising (Policy BEL7):** Please consider including policy wording to restrict advertising (at street level and above) which the KNF has found important in the Knightsbridge Neighbourhood Area.
6. **Late night uses in the Neighbourhood Area (Policy BEL9):** This policy is strongly supported. The KNF is pleased to note reference to a litter management plan in paragraph 6.3.2. Planning conditions requiring noise, operating, service, travel and waste management plans are important.
7. **Trees and greening (Policy BEL12):** This policy is excellent. The KNF strongly supports references to the preparation and application of Tree Management Plans in the policy. Record temperatures in London in 2022 highlight the need for climate, pest and disease resilient trees and the planned renewal of the urban forest. Please require planning conditions, where possible, to ensure that synthetic greening is not used.
8. **Major development sites (Policy BEL14):** The KNF supports this approach and the recognition of important issues for major development sites such as design, heights and permeability. The KNF

is particularly pleased to see reference in the policy to developments meeting the highest environmental standards. This should not be achieved by worsening air quality.

9. **Community engagement:** The KNF is pleased to see the addition of best practice guidance on community engagement which aligns with the equivalent guidance that supports the KNP. The KNF wholly supports the inclusion of section 9 on priorities for neighbourhood CIL funds which have been valuable in the KNP.
10. **Strengthen policy wording:** The KNF urges the BNF and WCC to strengthen the KNP's policy wording wherever possible in order to increase the likelihood of the purpose of each policy being achieved when planning decisions are taken. The KNF encourages the BNF to avoid potentially ambiguous policy wording i.e. by making it as clear as possible. For example, is the reference to alfresco service in Policy BEL9(B) intended to encourage or manage alfresco activities?
11. Please feel free to make use of relevant wording from the KNP if amending the BNP e.g. from the KNP's glossary or relevant reasoned justification.
12. **Planning conditions:** The KNF has commenced a five-year review of the impact of the KNP on planning decisions in order to understand how effective the plan has been and how it could be used more effectively in future. Preliminary findings suggest that Westminster is not referring to it frequently enough in planning decision notices or including tailored or new planning conditions to meet its requirements e.g. to mitigate the impacts of commercial development on residential amenity, achieve zero air emissions or stop the proliferation of synthetic greenery. The BNF may wish to require specific planning conditions in planning decisions to ensure that the aims or purpose of a policy will be achieved. These should meet the tests in national Planning Practice Guidance (Paragraph: 003 Reference ID: 21a-003-20190723).

Thank you for the opportunity to comment on this excellent neighbourhood plan.

Yours sincerely

Simon Birkett
Chair
Knightsbridge Neighbourhood Forum

Cc:

Councillor Geoff Barraclough, Cabinet Member for Planning and Economic Development
Dennis Wheatland, Chairman of the Belgravia Neighbourhood Forum