
From: Simon Birkett <[REDACTED]>
Sent: 02 March 2018 17:57
To: [REDACTED]
Cc: [REDACTED]
Subject: KNF - Examination for the Knightsbridge Neighbourhood Plan
Attachments: KNF 032 Response to NLP consultation 020318.pdf

Dear Chris

Please confirm receipt.

I am writing to introduce the Knightsbridge Neighbourhood Forum (Forum) to Ms Jill Kingaby and Intelligent Plans and Examinations (IPE). The Forum is pleased that Ms Jill Kingaby has been appointed as independent examiner for the Knightsbridge Neighbourhood Plan (Plan).

The Forum submitted three letters in response to Westminster City Council's (WCC's) Regulation 16 consultation on the Plan (combined into response numbered #58). These included:

- i. a number of minor erratum items among eight documents submitted (page 1 – letter dated 12 February);
- ii. examples of three responses received during our Regulation 14 consultation and a letter omitted, presumably by accident, by Historic England (page 7 – letter dated 14 February); and
- iii. the results of the Forum's preliminary review of the draft new London Plan (page 70 – letter dated 14 February).

The third of these letters offered to send the Examiner a copy of the Forum's representations to the Mayor on the draft new London Plan (page 73). Please therefore find attached a copy of the Forum's response submitted today to the Mayor.

Separately, I am pleased to advise the Examiner that the Forum is in the process of preparing a response to the representations received under Regulation 16. With 99 responses to consider, with over half from organisations or businesses, the Forum anticipates being able to complete this exercise by Wednesday 4 April i.e. immediately after Easter. I hope that timescale would be acceptable to the Examiner.

I have copied Sean Walsh and Andrew Barry Purssell at WCC, Emily Candler (my Vice Chair) and Christopher Barrass (Director and Secretary of the Forum) and Chris Bowden of Navigus Planning and Kate Harrison of Harrison Grant who advise the Forum.

Meanwhile, please contact me if you have any questions. My private contact details are below. I will inform you shortly if the Forum sets up a formal email address for communications during the Examination but [REDACTED] will continue to reach me.

The Forum looks forward to assisting the Examination.

Yours sincerely

Simon

Simon Birkett
Chair
Knightsbridge Neighbourhood Forum

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RT JC-XBZZ-GJKZ
London SE1 2AA

By email to londonplan@london.gov.uk

2 March 2018

Dear Mayor Khan

Representations on the Draft New London Plan

I am writing on behalf of the Knightsbridge Neighbourhood Forum (Forum) to make representations in response to the consultation on the Draft New London Plan (NLP).

The Forum received copies of 99 responses to Westminster City Council's (WCC's) Regulation 16 consultation on the Knightsbridge Neighbourhood Plan (Knightsbridge Plan) on 23 February 2018 including one from the Mayor of London (your reference LDF33/LDDD36/BS dated 14 February 2018). Thank you for responding to that consultation and your recommendations which the Forum will consider carefully. The examination of the Knightsbridge Plan has now commenced.

New London Plan

The Forum wishes to make representations on certain matters in the NLP which it considers will help the Mayor to achieve his objectives and support neighbourhood planning. In this regard, the Forum's representations have been informed by an initial review of the 99 representations made to WCC's Regulation 16 consultation on the Knightsbridge Plan.

The Forum is pleased to see many of the NLP's policies and approaches. For example:

- The NLP retains and strengthens the role of the Central Activities Zone (CAZ), the International (Town) Centre in Knightsbridge, Hyde Park and Kensington Gardens and the specialist activities of arts, culture and entertainment in the Knightsbridge Neighbourhood Area.
- The NLP provides clear guidance that Development Plans must ensure tall buildings are sustainably developed and only in appropriate locations.
- In respect of healthy air, the NLP expects development to aim to be 'Air Quality Positive' and all other development to be at least 'Air Quality Neutral' (i.e. not lead to a deterioration of

existing air quality), with particular care expected in Air Quality Focus Areas (AQFA), one of which includes part of the Knightsbridge Neighbourhood Area.

- The Forum is pleased to see that the NLP addresses the many types of development including cultural activities (including education), housing, local shops, offices, pubs and shopping centres.

Sustainable development

Sustainable development ‘respects the interests of all and protects the integrity of the global environmental and developmental system’ (Rio Declaration on Environment and Development, 1992).

The Forum encourages the Mayor to align the NLP more explicitly to the United Nations Sustainable Development Goals (SDGs) and use the ‘2030 Agenda for Sustainable Development’ as a framework for the achievement of other important outcomes e.g. compliance with air quality limit values and World Health Organisation guidelines, science-based reductions in greenhouse gas emissions and ‘sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all’.

The Forum believes that, by doing so, the Mayor would be well placed to specify policies that will optimise action over the plan period. For example, such policies should encourage additional incremental action now (such as the creation of zero air emissions buildings during major refurbishment or new development) and mitigate the day to day impacts of construction activity and the night-time economy that can undermine the short, medium and/or long-term viability of nearby businesses and residential communities. This approach offers the opportunity to minimise the cost of achieving important long-term outcomes such as making London a zero-carbon city by 2050.

Please look closely at the Knightsbridge Plan to understand our approach to the achievement of such outcomes over the plan period while encouraging the growth of existing and new businesses and other activities (such as culture and education) and seeking to minimise the requirements for different scales of new development on a case by case basis. Our website address is knightsbridgeforum.org.

Engagement with many stakeholders during the preparation of the Knightsbridge Plan has found widespread enthusiasm for the above approach and practical steps already being taken to implement it.

Specific policies

The Forum is also pleased to see that the emerging policies of the NLP will support the achievement of the 10 main objectives in the Knightsbridge Plan. For example:

Objective 1: 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

NLP Policy D8 (‘Tall buildings’) confirms that the locations where tall buildings are appropriate should be determined by Borough Development Plans. In this regard, the Westminster City Plan and the Knightsbridge Plan are clear that Knightsbridge is not a location where tall buildings are generally appropriate. The Forum encourages the Mayor to do more to protect the urban forest, particularly trees, from climate change, disease and pests and ensure its steady renewal (NLP Policy G7) (see below).

Objective 2: Improve the public realm and enhance and restore heritage features

NLP policies on ‘Green infrastructure and Natural Environment’ (NLP Policies G1 to G9). In particular, the references to urban greening and the requirement to incorporate green roofs and walls as

part of major development proposals (Policy G5). The Forum however encourages the Mayor to do more to enhance biodiversity, protect the urban forest and mitigate the urban heat island effect.

Objective 3: Protect and enhance Hyde Park and Kensington Gardens Metropolitan Open Land including the Hyde Park Barracks land

The reinforcement of the strongest level of protection against harm to the ‘Metropolitan Open Land’ (MOL) in NLP Policy G3 is welcomed. The Forum notes particularly the relevance of policies about the Metropolitan Open Land as they relate to the Hyde Park Barracks which was identified as a strategic housing site in the Westminster City Plan.

The inclusion of reference in NLP Policy D13 to ‘Quiet Areas’ and ‘spaces of relative tranquillity’ and the identification and nomination of these being a matter for Boroughs and ‘others with relevant responsibilities’ (which we consider includes designated neighbourhood forums preparing neighbourhood plans) is welcomed.

NLP Policy D6 recognises that density needs to be considered within its surrounding context and that higher density development should be subject to greater scrutiny regarding its design quality and the proposed ongoing management.

Objective 4: Promote the sense of community

The Forum notes the NLP policies on the night-time economy (through NLP Policy HC6) and welcomes the proposal to create a requirement for ‘an integrated approach to planning and licencing’. Equally, the policy approach in the ‘Agent of Change’ policy (NLP Policy D12) recognises the importance of adequate management of noise from uses such as pubs where they are close to residential areas. This is a significant issue in Knightsbridge and the policy approach is broadly welcomed.

On a related theme, the NLP ‘Design’ policies concerning the public realm (NLP Policy D7) and noise (NLP Policy D13) recognise the need to balance the growing competition for access to public space by a range of activities.

Reference in NLP paragraph 3.9.4 to Construction Method and Management Plans, including basement development, which most commonly will only involve a single dwelling. Moreover, NLP Policy S11 requires development of all sizes across London to comply with the Non-Road Mobile Machinery Low Emission Zone. There needs to be a robust approach to mitigating the impacts of construction activities within the Central Activities Zone, which includes the whole Knightsbridge Neighbourhood Area.

Objective 5: Protect and enhance existing residential amenity and mix

The Forum notes that the NLP seeks to ensure the best use of existing housing stock, with NLP Policy H11 supporting mechanisms to encourage stock to be occupied and discourage properties from being left empty as ‘buy-to-leave’ properties.

Objective 6: Foster an environment that enables our world-class cultural and educational institutions to thrive as centres of learning and innovation within a flourishing community

The NLP’s ‘Heritage and Culture’ concept (Chapter 7) of identifying South Kensington as an ‘arts, culture and entertainment cluster’ is welcomed as being consistent with the concept of the Knightsbridge Plan’s approach to the Strategic Cultural Area within the neighbourhood area.

Objective 7: Enable active travel and personal mobility and

Objective 8: Encourage superb public transport

The NLP ‘Transport’ policies (NLP Policies T1 to T9) which recognise the importance of improving the balance of space given to people to walk, cycle and use public transport. The use of the concept of ‘Healthy Streets’ (NLP Policy T2) in the NLP is encouraging, particularly with respect to ‘active travel’. In addition, parking and motor vehicle policies in the NLP (NLP Policies T6, T6.1-T6.5, T7) are welcomed to minimise car use generally and maximise the provision for electric vehicle infrastructure. We note that the NLP insists on zero provision of parking in the CAZ and in areas with high public transport accessibility (NLP Policies T6 and T6.1-T6.3), rather than simply encouraging it.

Objective 9: Encourage superb utilities and communications infrastructure

The Forum welcomes in general terms the ‘Sustainable Infrastructure’ policies in the NLP (NLP Policies SI1-SI17) and notes in particular the policies on water infrastructure (NLP Policy SI5), flood risk (NLP Policy SI12), sustainable drainage (NLP Policy SI13) and digital connectivity (NLP Policy SI6).

Objective 10: Be an exemplar in sustainable city living by complying fully with international laws, standards, guidelines and best practice

The NLP aims to support the Mayor’s commitment to London becoming a zero-carbon city which the Forum has commented upon earlier in this letter. In this respect, the Forum notes the ‘Sustainable Infrastructure’ policies (NLP Policies SI1-SI17), the Green Infrastructure and Natural Environment policies (NLP Policies G1-G9), improving air quality (NLP Policy SI1), minimising greenhouse gas emissions (NLP Policy SI2), trees and woodlands (NLP Policy G7) and biodiversity (NLP Policy G6).

The Forum welcomes the recognition by the NLP that early engagement with local people leads to better planning proposals, with specific recognition of the value of neighbourhood plans (paragraph 1.1.5 on page 12 of the NLP). However, the Forum would like the NLP to provide more explicit support for neighbourhood planning and the value of neighbourhood plans throughout the document. This should include specific policy wording that encourages local planning authorities to empower rather than curtail neighbourhood forums in achieving their aims. The Forum commends for your attention specific proposals from NeighbourhoodPlanners.London in its response to the NLP consultation.

Community Infrastructure Levy

The Forum welcomes the NLP’s recognition that Community Infrastructure Levy (CIL) funding should be used to address a wide range of infrastructure needs (NLP Policy T9). This includes the specific reference in NLP Policy T9(C) to contributions towards ‘making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach’. Equally, the prioritisation of planning obligations in NLP Policy DF1 on ‘culture and leisure facilities’ and the requirement in Part E of the policy for charging authorities to take account of this in preparing their CIL Regulation 123 lists is welcomed.

Close

The Forum would like to give oral evidence about neighbourhood planning related matters at the Examination in Public if invited to do so.

Yours sincerely

Simon Birkett
Chair

From: Chris Snarr [REDACTED]
Sent: 05 March 2018 10:11
To: 'Simon Birkett'
Cc: [REDACTED]
Subject: RE: KNF - Examination for the Knightsbridge Neighbourhood Plan

Dear Simon

Many thanks for your email (which I will forward to Jill), I know that she is very pleased to be examining the Knightsbridge Neighbourhood Plan. Our examiners always find the Forum's response to Regulation 16 representations extremely useful and helpful. Your date for submitting your response to the representations has been noted.

Sean Walsh helpfully sent us hard copies of the submission documents and representations at the end of last week. These have been passed to Jill so that she can start her preparation as part of the examination process. The next stage is that Jill be writing to the Forum/local authority on a number of standard procedural matters.

Kind regards

Chris Snarr
Director

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