



Historic England

Mr S Birkett  
Chair  
Knightsbridge Neighbourhood Forum

Our ref: PL00160146

By email: [REDACTED]

21<sup>th</sup> September 2017

Dear Mr Birkett,

### **Regulation 16 Knightsbridge Neighbourhood Plan (2017-2036) Strategic Environmental Assessment Screening Report (August 2017) consultation**

Historic England is the Government's advisor on all matters relating to the historic environment and a statutory consultee on a broad range of applications including the Strategic Environmental Assessment (SEA) of plans. Accordingly, we have reviewed your documents in the light of the Environmental Assessment of Plans and Programmes Regulations and the National Planning Policy Framework (NPPF), with particular regard to the NPPF's core planning principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Having done this, and further to our advice in response to the Knightsbridge Neighbourhood Plan (2017-2036) and Draft Strategic Environmental Assessment Scoping Report consultation dated 8<sup>th</sup> June 2017, Historic England is pleased to offer the following advice.

While there is much that we continue to welcome in the draft Plan, including the care and thought that has been given to the drafting of policies for this important historic neighbourhood, we note that the policy on tall buildings has shifted significantly from the previous draft. Where previously it clearly stated that tall buildings were inappropriate in Knightsbridge due to the general low-rise character of the area, it now takes a position which could be interpreted as tacitly encouraging them. We are unclear what evidence has been used to support this shift in emphasis. We also consider that this is an issue that could lead to impacts on the historic environment around Knightsbridge, and beyond into other parts of Westminster and surrounding boroughs.

We note in particular in KBR7 that the test for schemes being considered acceptable is that they would not have a 'significant adverse impact' on some types of heritage assets, which raises two issues. Firstly, this appears to accept that some adverse impact is automatically acceptable, thus introducing local tests that we do not consider are in line with those contained in the NPPF paras 132-135 concerning harm and substantial harm to heritage assets (designated and undesignated). Secondly, we are surprised to see that the most



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relevant heritage designations to Knightsbridge, namely listed buildings and other heritage assets such as registered parks and gardens, have been removed from the list. While it could be argued that these are covered in policy elsewhere, given the particular relevance to the Knightsbridge neighbourhood area in terms of size, number and impact on local character of these asset types, their removal from the policy is a regrettable change that we do not support. Furthermore, we note that this is a marked departure from the policy approach promoted by Westminster City Council's current policies and also appears to go against the aspirations of the Neighbourhood Plan vision, values and objectives.

In relation to part B of the policy, we also query why this part of the policy only relates to tall buildings 'where they are located in close proximity to existing tall buildings'. This not only suggests that the policy does not apply in areas not close to other tall buildings, but appears to encourage tall buildings on the Knightsbridge Barracks site, and potentially around 1 Hyde Park, despite text in paragraph 3.21 which indicates the contrary. We note that in both of these locations tall buildings are likely to have a major impact on the setting of Hyde Park and have the potential to impact upon the setting of many other listed buildings in the Knightsbridge area and beyond. Given the supporting text, and the need to conform with saved UDP policy DES3 notably part A2, we would encourage you to fully review this part of the Neighbourhood Plan.

Turning to the SEA Screening Report, in light of the above comments, we can offer the following advice. While we agree with many of the conclusions that this report reaches, we consider that a full SEA would be required due to the proposed tall buildings policy. This is because the wording of the tall buildings policy has the potential, in its current form, to lead to significant environmental effects on some of London's most significant heritage assets. These effects are unlikely to have been tested in previous environmental assessments, given the existing policy framework that the Neighbourhood Plan will be set within.

We note that the previous version of the policy, dated 27<sup>th</sup> April, appears to be more in line with the supporting text to KBR7; other references to tall buildings within the draft Plan; and the City Council's policy DES 3. The previous version of KBR7, while having some overlap with the City Council's policy had the benefit of covering those heritage assets most likely to be negatively affected by tall buildings proposals in Knightsbridge, which I refer to above. Therefore, because of its more cautious approach to new tall buildings and its conformity with the existing higher level policy, the April version on KBR7 seems less likely to require a full SEA as it would have been less likely to lead to new and untested significant environmental effects.

Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from your Neighbourhood Plan, and



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which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan and encourage you to share it with the local planning authority.

Yours sincerely,



**David English**  
Historic Places Principal London



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