

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM



Knightsbridge Neighbourhood Plan 2017 – 2037

Consultation Statement

November 2017

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1 INTRODUCTION

- 1.1** The policies contained in the Knightsbridge Neighbourhood Plan (the KNP, Neighbourhood Plan or Plan) have been developed as a result of extensive interaction and consultation with residents, businesses, institutions, workers, students, visitors, statutory consultees and others. This consultation process has taken place over more than two years and has included surveys, public exhibitions and face-to-face activity.

This Consultation Statement has been prepared in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012, which requires a Consultation Statement to:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.

Knightsbridge Neighbourhood Forum

- 1.2** In October 2013, the Knightsbridge Association (KA), the principal guardian of the area as the amenity society for over 50 years with a membership of around 1,000 residents and organisations, applied to Westminster City Council (WCC) for Knightsbridge to become a neighbourhood area. This application was accepted and the Knightsbridge Neighbourhood Area (the Area, KNA or Neighbourhood Area) was formally designated on 27 March 2014.
- 1.3** The KA supported an application by a new and independent legal entity to become the local neighbourhood forum rather than convert the KA's constitution to meet the narrower requirements for neighbourhood forums contained in the Localism Act 2011. That decision also reflected an understanding of the complementary aims of the two entities. WCC ran a statutory six-week representation period which closed on 15 May 2015 and then designated the Knightsbridge Neighbourhood Forum (the Forum, KNF or Neighbourhood Forum) on 21 July 2015.
- 1.4** Under the Forum's constitution, at least half its board must comprise local residents with the Chair always being a resident. Local cultural institutions and businesses are also represented on the Neighbourhood Forum board and are guaranteed a role in its governance.
- 1.5** The Forum does not intend to compete with the KA or other community, business or cultural groups. Rather the Forum seeks to use its powers to write planning policies that will sit alongside WCC's development plan and articulate community priorities for the development of the Neighbourhood Area. The Forum has a five year exclusive right to develop an official Neighbourhood Plan for the Area.

2 Summary of engagement activities, issues and outcomes

2.1 Following its creation in July 2015, the Forum set out an approach to develop the Neighbourhood Plan. It was agreed that the Plan would focus initially on four broad areas in Knightsbridge, called Quarters, namely:

- Hyde Park (including the Barracks);
- Business (mainly along the A4 and Knightsbridge);
- Residential; and
- Cultural.

2.2 A set of overarching aims, enshrined in the constitution of the Forum, include:

- consult widely on ways to improve the functioning of the Knightsbridge Neighbourhood Area;
- protect, preserve and enhance the Area's unique character;
- make the area more sustainable;
- have a well-planned and maintained public realm which responds well to the high volume of workers and visitors to Knightsbridge and the needs of local people;
- support efforts to reduce crime and disorder and prevent public nuisance;
- enhance its economic performance for local businesses and suitability for local institutions; and
- support measures which improve air quality and reduce noise nuisance.

2.3 One of the challenges that the Forum has faced is that Knightsbridge means a lot of different things to different groups of people and organisations. In order to understand all these perspectives, the Forum developed an engagement strategy to encourage residents, businesses, students, visitors and others to engage with the emerging Plan. This strategy involved a six-stage approach:

- i. hold early discussions with key stakeholder groups within each of the Quarters through a series of meetings and workshops. These would inform the development of the draft vision, values and issues;
- ii. present the outputs from stage (i) at a number of public engagement events with the wider community, including a two-day public exhibition, in order to seek feedback and views on the key issues identified;
- iii. develop a 'Top 75' list of priorities or 'skeleton' to be tested through a further public exhibition in order to inform and shape the development of the draft Plan;
- iv. produce a first draft of the Plan based on the 'skeleton' and priorities for policies and actions that had been tested, amended and confirmed during the second public exhibition and test this initial or early draft with key stakeholders;
- v. consult formally on the draft Plan during the Pre-submission (Regulation 14) stage; and
- vi. finalise the Plan to address comments received during the Regulation 14 consultation.

2.4 This activity was underpinned with wider communication activity, including social media engagement and ongoing discussions with individual stakeholder groups. The main activities undertaken are set out below in further detail.

Stage i: Early discussions with stakeholders

- 2.5** In order to establish the initial draft vision and objectives, two workshops were held in December 2015 - one with the Forum directors and a second with the KA. The outcomes of these workshops enabled a series of information boards to be developed to encourage input from the wider community during two drop-in days in February 2016.

Stage ii: Presenting the outcome of initial discussions

- 2.6** The first exhibition, which ran over a Friday and Saturday in February 2016, was set up in the foyer of the main building of Imperial College London in Exhibition Road. The draft vision and objectives were presented on a series of display boards ¹ alongside structured questions about Knightsbridge to prompt feedback on the most important issues to be addressed by the Plan.



- 2.7** The exhibition was staffed by members of the Forum and its advisors who were on hand to answer questions. The event was promoted in the following ways:

- via the KA – including an update in the Annual Report and at the Annual General Meeting, an article in the quarterly newsletter, and direct information to members via its mailing list;
- a leaflet drop across the neighbourhood area;
- via local groups – including the Exhibition Road Cultural Group and the Knightsbridge Business Group;
- on the Forum’s website; and
- via social media – including Twitter and Facebook.

- 2.8** All material was made available on the Forum’s website and feedback was sought online to gather further views. About 100 people attended the exhibition and feedback from this and the online methods was collated into the Consultation Report – dated 24 March 2016².

- 2.9** A traffic light summary identifying which themes and objectives needed to be addressed before they could be progressed, was created and is included in Appendix A. ‘Green’ meant that the approach taken to this point was appropriate and was endorsed, ‘amber’

¹ http://www.knightsbridgeforum.org/media/documents/knf_drop-in_boards_260216_website.pdf

² http://www.knightsbridgeforum.org/media/documents/knf_consultation_report_final_240316.pdf

meant that more work was needed before it could be endorsed, and 'red' meant that there was a fundamental problem in taking the theme/objective forward. None of the themes or objectives were considered to warrant a red light.

- 2.10** A key outcome from the process of consultation at this stage was to establish whether the proposed vision, values and objectives underpinning the Plan were appropriate in light of the matters raised by the community. Certain issues were raised regarding the need for more work and refinement of certain objectives as well as matters relating to neighbourhood management and spending priorities. It was notable that none of the themes or objectives were identified as having fundamental problems which would have meant they should not be taken forward.
- 2.11** Values, objectives, neighbourhood management and spending priorities were duly refined and revised to inform the development of the 'Top 75' priorities that would support them.

Stage iii: Developing and consulting on the 'Top 75' priorities

- 2.12** The feedback from the consultation events was used by the Forum to put together a document detailing the most supported options for inclusion in the Plan, couched within 15 sections. The information comprised issues that might be reflected in planning policies (vision, values and objectives) and also issues that might be included in the Neighbourhood Management Plan that would accompany the Neighbourhood Plan as non-policy actions. They also included possible spending principles and priorities for the neighbourhood portion of the Community Infrastructure Levy and other planning obligation monies. The 'Top 75' initially included possible neighbourhood development orders which were not pursued.
- 2.13** Once the priorities had been identified, the Forum produced large display boards³ to be displayed at a further exhibition at the Goethe-Institut between 1.00 pm and 6.00 pm on Wednesday 6 July 2016. It provided an opportunity to display information about how the feedback gathered to date had been used to further refine the vision, values, objectives and other proposals. The public event was immediately followed by the Forum's first Annual General Meeting (AGM) at which the Forum's members had a further opportunity for discussion and questions and answers.



³ Copies of the display boards from the event can be viewed at: http://www.knightsbridgeforum.org/media/documents/knf_sec-ond_consultation_060716_final.pdf

- 2.14** As with the first exhibition, this exhibition was also widely promoted to encourage as many people to attend as possible.
- 2.15** Attendees at the second exhibition were invited to provide feedback on the information presented via an online survey on the Forum's website. The Forum also emailed key stakeholders to seek feedback on this information. The Forum requested comments to be provided by 15 July 2016.
- 2.16** A separate survey, aimed solely at the cultural institutions, was undertaken in parallel to gain feedback on the aspects of the emerging Plan most relevant to them.
- 2.17** In total, some 90 comments were received. A summary of the feedback received at the event is included in Appendix A. This shows that the revised vision, values and objectives all received at least 85% support with most having well over 90% support. The level of detail on the display boards enabled responses on individual matters to be very precise. Where support was lower, it was due to the objectives being ambiguous or needing greater clarity. This weakness was easy to address.
- 2.18** The Forum considered that the outcome of the process was a clear confirmation of the approach and issues that the Plan should cover. The elements of the Plan noted originally as 'amber' in the traffic light summary produced after the first exhibition were changed to 'green'. Given the high levels of support for all the objectives presented, it was clear that the Plan had to cover a wide range of policy areas. The feedback received was then used alongside the evidence base to develop the detail of the policies that formed the initial draft of the Plan.
- 2.19** A summary of the main issues and concerns, arising from stages i, ii and iii is provided in Appendix A and the Consultation Report dated 24 March 2016.

Stage iv: Producing the first draft of the Plan

- 2.20** In July and August 2016, the Forum drafted an initial draft Plan which was completed by 7 September 2016. The Forum shared the early draft with a range of stakeholders to gain informal feedback. These included the KA, WCC, TfL and RBKC and others, who were given several weeks to return comments. WCC requested and was given six weeks to respond.
- 2.21** During this period, the Forum also held a series of meetings with various groups including the cultural institutions and RBKC residents' groups. Letters were received from WCC which made recommendations about certain aspects of the Plan that it considered should be taken into account prior to the publication of the Regulation 14 draft document.
- 2.22** A preliminary health check of the 7 September 2016 draft document was undertaken by an NPIERS accredited and independent Examiner to highlight any areas that might require particular consideration. A written response was received on 27 October 2016 on two matters:

- whether the policies relating to the Hyde Park Barracks land were in conformity with the Basic Conditions bearing in mind initial comments received from WCC; and
- whose role it was to undertake a Strategic Environmental Assessment (SEA) screening exercise.

A copy of the preliminary health check is provided in Appendix B.

2.23 Altogether the information gathered during this time enabled further detail to be added to the draft document and, crucially, a decision was taken to split the Plan into three parts: the Plan itself, containing the policies; a Neighbourhood Management Plan, containing the non-policy actions; and a document containing the evidence to underpin Parts One and Two. It was felt that this would make the Plan easier to navigate and use.

2.24 The following activities were undertaken as part of the process during stages (i), (ii), (iii) and (iv):

Media and public relations

Logo – A logo was developed to accompany all Forum documents and information.
Dedicated email and website – The Forum’s website - www.knightsbridgeforum.org - was launched in December 2015 and updated in January 2016.

Commonplace – January 2016 - The website had a facility called Commonplace, a map-based tool which allowed people to directly submit their views about the emerging Plan and reply to responses made by others.

Facebook page – The Knightsbridge Forum Facebook page was established and updated throughout the process. It had 600 followers at 26 April 2017.

Twitter – the @KnightsbridgeNF account was updated throughout the process and had 626 followers at 26 April 2017.

Information leaflets and fliers – Leaflets were distributed across the neighbourhood area at various points in the process – Spring 2015, February 2016 and December 2016 - to encourage support for the Forum and to promote the drop-in events and the commencement of the Pre-submission (Regulation 14) consultation on the Plan.

Press articles – Aspects of the emerging plan have been mentioned several times in the Evening Standard and elsewhere e.g. about air pollution and the Hyde Park Barracks.

Local surveys

Survey Monkey – A dedicated online survey accompanied the second public exhibition, with one tailored to garner the views of the cultural institutions.

Face-to-face meetings/ letters

The Forum interacted with a variety of stakeholders during the planning process. A summary of the face-to-face engagement activity is detailed below by sector:

Local community

Knightsbridge Association (KA) – The KA exists to promote the interests of residents, businesses and visitors in Knightsbridge. It applied for Knightsbridge to become a Neighbourhood Area and supported the creation of the Forum to take it forward. The KA have been heavily involved in the development of the Neighbourhood Plan through a series of workshops and meetings as well as providing updates in their newsletters and hosting presentations at their Annual General Meetings.

Local resident groups – Regular contact has been made throughout the process with representatives from Kingston House, 10 Lancelot Place, the Knightsbridge Residents Management Company Limited and others.

Neighbouring resident groups – The Brompton Association, in the neighbouring Royal Borough of Kensington and Chelsea, formally responded to the initial consultation as did the Onslow Neighbourhood Association, Prince's Gate Mews Residents Association, the Thurlow Residents Association and the Queensgate Association.

Local businesses

Knightsbridge Business Group (KBG) – This is a group of Knightsbridge-based companies including luxury retail, hotel, restaurant, finance and real estate, which exists to promote Knightsbridge to international and local audiences. Following an initial discussion with representatives in late 2015, the group has been actively engaged throughout the process and has made submissions at various points to contribute the business perspective.

Individual businesses – Businesses have engaged in the process, not just through the business group, but also as individuals. These include the Bulgari Hotel, the Mandarin Oriental Hyde Park and JWT.

Cultural organisations

Exhibition Road Cultural Group (ERCG) – This is made up of 18 national and international cultural and educational organisations, along with the two local councils (WCC and the Royal Borough of Kensington and Chelsea (RBKC)). ERCG champions the collective view of the cultural area and represents the combined institutions in the development of the Exhibition Road scheme and in national projects. The group has been heavily involved with the development of the Plan.

Individual institutions – Institutions have engaged in the process, not just as part of the ERCG but also as individuals. These include the Goethe-Institut and Imperial College London.

Service providers and interest groups

Friends of Hyde Park and Kensington Gardens – This is a membership organisation and charity comprising over 600 members. They were engaged regularly during the process, including submitting a written response to the first exhibition.

Transport for London – TfL Planning responded to the initial consultation event and have been involved in discussions and provided written submissions as the planning process has gone on.

Clean Air in London – This campaign group aims to achieve urgently and sustainably full compliance with World Health Organisation (WHO) guidelines for air quality throughout London and elsewhere. The Founder and Director of the group is also the Chair of the Forum, who has contributed particularly to the policies relating to pollution control and the environment.

Kensington Society – The Society has over 700 members and 30 affiliated societies. Its aim is to protect the heritage of buildings, parks and gardens and is heavily involved in planning decision that impact on RBKC. Representatives attended the initial consultation drop-in event and have been engaged regularly during the process.

London Cycling Campaign – The 12,000-strong membership charity has been engaged on the transport aspects of the Plan.

Cyclescape – This is an online group which offers a campaigning toolkit for UK cycle campaign groups. The campaign group local to Knightsbridge contributed to the Plan.

Local authorities

Westminster City Council (WCC) – Regular meetings have taken place with WCC throughout the planning process, with both officers and councillors. The Forum invited and received written comments from WCC officers or met them about:

- an informal draft of the Plan (pre-Regulation 14 stage) and the approach to screening whether the Plan would be likely to have significant environmental effects, October 2016;
- a meeting to discuss matters arising from the Regulation 14 version of the Plan and relating to the screening processes for a Strategic Environmental Assessment (SEA), January 2017;
- the Pre-submission (Regulation 14) version of the Plan, February 2017;
- meeting with the Forum's planning consultant to discuss matters arising from the Regulation 14 version of the Plan, March 2017;
- a revised draft of the Plan (pre-Regulation 16 stage), along with a meeting to discuss matters arising, June/July 2017; and
- the SEA and Habitats Regulations Assessment (HRA) screenings, August/October 2017.

Royal Borough of Kensington and Chelsea (RBKC) – The Head of Forward Planning responded to the initial consultation event and ongoing discussions have ensued, particularly around shared boundary issues. Contact has also been made with local councillors from the borough.

2.25 Examples of materials to support and promote the engagement process can be found in Appendix C.

Stage v: Pre-submission (Regulation 14) consultation

- 2.26** The Forum finalised the first full draft Plan in November 2016. The Pre-submission (Regulation 14) consultation ran for a ten-week period from 8 December 2016 to 15 February 2017. Paper copies of the draft Plan were made available on request and the document could also be read on the Forum website. A co-ordinated campaign to publicise the draft Plan was undertaken comprising the following:
- an Executive Summary written by the Chair of the Forum;
 - a two-page editorial piece in the KA Annual Report;
 - an exhibition on 7 January 2017 to coincide with the Annual General Meeting of the KA. This provided an opportunity for local stakeholders to talk to the Forum about the Plan, look at copies of the Plan and provide feedback on the content;
 - notifications were sent to statutory and non-statutory consultees via letter or email;
 - hand-delivered letters to residences and businesses in the neighbourhood area (circa 750 premises);
 - the Chairs of the Knightsbridge Business Group (KBG) and the Forum spoke to business members at the KBG's Christmas event to raise awareness of the Plan and encourage responses. The KBG also wrote to its 24 large business members to encourage them to respond to the formal consultation and sent out reminders prior to the deadline;
 - social media activity on Facebook and Twitter to publicise the consultation; and
 - the Forum also met WCC on 7 January 2017 to talk through the draft Plan and other matters, prior to them submitting their formal consultation response.
- 2.27** In accordance with requirements of the Neighbourhood Planning regulations, relevant statutory consultees were notified. In addition, a range of individuals and organisations considered to have a particular interest in the Plan were also written to. A list of consultees – statutory and non-statutory – is contained in Appendix D. A copy of the letter sent to the consultees is shown in Appendix E.
- 2.28** Comments received during the Regulation 14 consultation were analysed and the Plan was amended to reflect or respond to the feedback. In a few cases, the Forum did not agree with comments received.
- 2.29** The following paragraphs provide a summary, by section and theme, of the comments received during the engagement process of the Plan, to show how the policies have evolved into their final form. Where policy numbering has been referenced, this refers to numbering in the Regulation 14 version of the Plan. Where the policy number differs in the Regulation 16 version of the Plan, this has been indicated.
- 2.30** **Vision, values and the local context:** The vision, “Make Knightsbridge the best residential and cultural place in London in which to live, work, study and visit”, has remained largely unchanged throughout the process. Having evolved slightly from its initial draft at the very start of the process, the ‘vision’ received support from 98% of stakeholders at the July 2016 exhibition and is felt to encapsulate the ambition of people and organisations with an involvement in Knightsbridge.
- 2.31** Equally, the values – Community; Conserving; Clean, quiet and safe; Iconic; Inspirational;

and International – were agreed as striking a helpful balance between the various interests of stakeholders in Knightsbridge and their descriptions have evolved to reflect this.

- 2.32** **General comments:** A number of comments were received which stressed the need to phrase policies in a positive way, without being too prescriptive and containing superfluous detail. This has been addressed throughout the Plan process. Where policies have contained information that refers to other policies, both in the London Plan or the Westminster City Plan, this has also been refined to address the local need, maximise readability and reduce potential conflict.
- 2.33** The policy relating to developer contributions (KBR49) has been deleted following feedback that it was not considered appropriate for a planning policy.
- 2.34** **Character:** ‘Maintaining, preserving and conserving the local character and heritage of Knightsbridge’ is a phrase which encapsulates the essence of the feedback that has been received regularly from residents and stakeholders alike throughout the engagement process. This consistent message has provided strong direction to the Plan to ensure that development respects its surroundings and is in keeping with that local context, largely focussed on the defined Character Areas. That said, comments received through Regulation 14 consultation raised valuable points about the need to encourage preservation without stifling innovation. Equally some stakeholders identified the importance of ensuring that policies about development are not overly prescriptive and onerous, for instance the use of ‘high quality’ instead of ‘highest quality’, which might otherwise make them difficult to implement or enforce. This is addressed in the Plan, taking care not to compromise the detail that adds the local dimension to the Westminster City Plan and London Plan policies.
- 2.35** A number of policies have been amended following engagement with stakeholders, mainly at Regulation 14 Stage:
- The policy dealing with local views, KBR5, has been amended to reflect the one specific view, along Montpelier Street, that is most important to protect.
 - Reference to the Hyde Park Barracks has been removed from Policy KBR6, local buildings and structures of merit, as some consultees felt that it might conflict with Policy KBR16 (Reg. 16 - KBR14).
 - The statue at 1 Knightsbridge Green alone, as opposed to the whole building, has been identified as a structure of merit, following concerns raised about the justification of the merits of the building as a whole.
 - Additional detail, based on guidance from Historic England, has been provided to justify the inclusion of the buildings and structures listed within Policy KBR6.
 - The policy on tall buildings, KBR7, has been amended to include fuller detail about how to apply it and where. Guidance from Historic England provided as part of the SEA screening process was valuable in this regard.
 - The policy on street furniture, KBR9, was removed as some consultees raised concerns that it simply repeated policy elsewhere, notably KBR3 and KBR4.
 - KBR13 (Reg. 16 – KBR12), protection and maintenance of local green spaces, has been amended following engagement with some of the owners, notably Imperial College London. The original list of nine green spaces has reduced to six, following this process.

- 2.36** There was a strong feeling from many in the local community that either the Hyde Park Barracks should remain as it is (i.e. solely a Barracks) or that the site should be returned to parkland. Recognising the need for policies to support sustainable development and considering the comments made repeatedly by WCC, through the NPIERS health check and at Regulation 14 stage by the Defence Infrastructure Organisation (custodians of the site), the policies about Metropolitan Open Land (MOL) – KBR14 and KBR15 - have been amalgamated into one new policy, numbered KBR13 in the Regulation 16 Plan. This new policy, and KBR16 (Reg. 16 – KBR14) specifically about the Hyde Park Barracks land, have also been amended to include explicit reference to ‘very special circumstances’ and to set out a series of policy priorities for the MOL which are in general conformity with adopted policies in Westminster’s City Plan.
- 2.37** **Community:** The engagement undertaken to inform the development of the Plan has consistently emphasised support for ensuring that the needs of the different groups in Knightsbridge – residents, workers, businesses, institutions, students and visitors – are addressed to achieve win-win outcomes. While the role of Knightsbridge as an international visitor destination has grown, there has been a general degradation in the quality of shops and amenities serving the needs of local residents, workers and students. Businesses and residents have also complained about ‘tattiness’ arising from inadequate maintenance and public services in the Area. The desire to protect remaining assets and promote opportunities to ‘bring back the quality that makes Knightsbridge special’ was a key strand in the feedback received.
- 2.38** Moreover the need to balance the emerging 24-hour city culture - part of London’s Core Central Activities Zone (CAZ) is within the Knightsbridge Neighbourhood Area – particularly with residential needs, is an issue that has been prominent when talking to stakeholders. A particular area containing potential conflicting activities was identified early on in the planning process and this has evolved to be identified as a ‘Neighbourhood Stress Area’. It is subtly different from Westminster City Plan’s Local Stress Areas in that it focuses on the concentration of activity as opposed mainly to the cause. Repeated engagement with WCC has helped to refine the policy.
- 2.39** Throughout the process of developing the Plan, stakeholders have raised concerns about the impacts of development just outside the borders of the Neighbourhood Area. It was agreed that such developments should be borne in mind, but that the focus should only be on matters within the Neighbourhood Area, as set out in the legislation and directly within the Forum’s powers.
- 2.40** In addition to promoting a sense of community, stakeholders have raised concerns about the need to secure a mix of residential development to give access to Knightsbridge as a place to live. This led to the development of Policy KBR29, encouraging housing which addresses the needs of students and local workers (Reg. 16 - KBR24) and KBR30 on the reconfiguration of buildings to meet the needs of people wanting to live in the area (Reg. 16 – KBR25).

2.41 A number of policies have been significantly amended following engagement with stakeholders, particularly at Regulation 14 Stage:

- KBR17 on the Neighbourhood Stress Area (Reg. 16 - KBR15) was initially felt too restrictive, potentially stifling development opportunities rather than enabling them. It has been revised to be more positively worded. Additional evidence was collated to illustrate the causes of stress within the area and to describe the subtle difference from WCC's Local Stress Areas.
- The policies about retail uses (KBR20 to KBR22) have been rationalised as a result of feedback received, which suggested undue repetition not only with each other but with London Plan policies as well. KBR18 replaces them in the Regulation 16 version of the Plan to provide a broader, more positive framework for retail within the context of what requires planning permission.
- Policy KBR23 on the protection of local public houses (Reg. 16 - KBR19) has removed its reference to 'community uses' which was considered by some consultees likely to create confusion and detract from the purpose of the policy.
- Policy KBR27 on construction activity (Reg. 16 - KBR23) has been significantly amended as the original draft was felt by a number of respondents to be imposing procedural requirements on the local planning authority which could go beyond what is reasonable for determining a planning application. The intention of the policy, to minimise the negative impacts of construction, has been widely supported, however. The policy has therefore kept and emphasised strategic aspects and then pointed to examples of standards and procedures that could help to deliver them. Advice from WCC also helped to refocus the policy on matters that can be addressed most directly through planning conditions.
- Policy KBR28 on short term lets was included in response to growing concerns among stakeholders about the 'buy-to-leave' phenomenon. Despite support among residents, it was acknowledged that the control of holiday lets for less than 90 days is not within the remit of planning and the policy has therefore been removed.
- Part B of Policy KBR30, Reconfiguration of existing residential buildings, (Reg. 16 – KBR25) has been deleted because it conflicted with the Westminster City Plan. In addition, the detail in Part A was felt by some to be overly prescriptive and has also been deleted.

2.42 **Culture and education:** The Strategic Cultural Area has provided a natural focus for the Plan given its unique role and history. Many stakeholders, particularly from the cultural and educational organisations, felt that more could be done to tell the story of 'innovation and inspiration' to the approximately 20 million visitors coming each year. The public space itself was felt to be an intrinsic part of this visitor experience and there has been strong support throughout for the Albertopolis proposals. It was noted, however, that there is a need to balance this with the needs of the residents who live in or near to this area. Feedback from residents has suggested that the relationship between some institutions and people living locally had been strained at times in the past and so the Plan has sought successfully to ameliorate this tension by building a consensus for the future.

2.43 Whilst there has been consistent support for the overarching objective relating to this theme, 'creating and maintaining an environment that enables our world-class cultural and educational institutions to continue to thrive and enhance their world class status and competitiveness', concerns were raised that it was unclear as to the geographic extent to which the policies within it applied. Therefore the introductory sections of the Plan were

amended to provide clarity that it was solely those parts of the Strategic Cultural Area falling within the Neighbourhood Area to which the policies applied. The two policies in this section have been amended as a result of feedback received during the consultation:

- KBR31 (Reg. 16 – KBR26) has been recast into four distinct elements in order to reduce repetition and conflicts with other policies in the plan as well as to provide greater clarity as to the nature of potential new development being addressed. For instance, a fuller description of what constitutes ‘ancillary development’ has been added.
- There was a suggestion to amalgamate KBR32 into KBR31. On balance, however, the Forum decided that the policy would become unwieldy and overly long. Rather, having one policy that relates to built development and another that relates to public realm improvements – where these require planning permission – was felt to be the most appropriate way forward. Nevertheless Policy KBR32 (Reg. 16 – KBR27) has been further amended as stakeholders considered it to lack focus: Parts A, B and C (b) have been consolidated into two elements of the policy with a focus on supporting two distinct public realm activities, namely the Albertopolis project and the use of temporary and pop-up exhibitions. Part C (a) has been removed as it dealt with non-planning actions.

2.44 Public spaces and utilities: Traffic movement was one of the top five concerns most cited during local engagement. This was principally in terms of safety for all road users, noise and associated impacts on air quality and climate change. The desire to promote alternative, more environmentally sustainable alternatives to the motor vehicle has been a strong theme throughout the engagement process. Indeed there has been near universal support for sustainable transport from all stakeholder groups. Much debate was had about how ‘active travel’ could be further encouraged along the Main Routes, in particular Brompton Road and Exhibition Road, and South Carriage Drive without removing the right for vehicular traffic to use it – an important issue for local residents. The importance of ‘active travel’ has been addressed, but tailored to the Neighbourhood Area, as policies have been refined. Stakeholders have been keen also to future-proof the Plan by encouraging development that will deliver sustainable features, such as electric car charging points and fibre optic capability (for faster broadband).

2.45 The main amendments to the policies in the section relate to adding greater clarity, more definitions of the terminology used and making reference to existing good practice guidance and standards. A number of suggestions received through the engagement process, for instance implementing a 20mph speed limit on Local Roads, were included in Part Two as non-planning items. Significant changes to the Plan included:

- Policy KBR35, safe and quiet roads, was deleted as some consultees felt it repeated other policies, although elements have been retained within Regulation 16 Policy KBR29 and incorporated in a newly introduced policy, KBR30, about assessing the significant transport impacts of development proposals.
- Policy KBR36 on cycling and walking infrastructure has been deleted because it simply listed a number of transport schemes so was not considered appropriate as a planning policy. Rather, these schemes were moved to Appendix D (of Part One) and Part Two.

2.46 Environment: There has been consistent support throughout the engagement process for objectives and policies that effectively encourage development to meet ambitious sustainability standards. In fact 100% of respondents at the consultation event in July 2016 agreed with this objective. The following amendments have been made to the policies in this section following extensive engagement:

- Some concern was raised about the ambition level of KBR41, healthy air (Reg. 16 – KBR35) and KBR42, renewable energy (Reg. 16 - KBR36). Engagement with Chelsfield LLP, which is leading on the Knightsbridge Estate development, and others has shown that the policies are important and necessary to improve air quality and mitigate climate change. Detailed evidence from Clean Air in London, including a legal opinion from Robert McCracken QC, was also valuable. These policies have therefore been retained and improved by adding additional flexibilities to make them easier to implement.
- Policy KBR43 on zero carbon development has been amalgamated into Regulation 16 Policy KBR36, renewable energy.
- A new policy has been added to the Plan, KBR37, retrofitting historic buildings for energy efficiency. This was predominantly as a result of evidence submitted by Clean Air in London, which, given the historic nature of many of the buildings in Knightsbridge, justified the need for a policy focussed specifically on this topic. This was then considered to address concerns raised by some residents living in historic properties who have found it difficult to improve the energy efficiency of their homes within the current framework e.g. trying to install double or secondary glazing even when consistent with the character of the Area and meeting high other standards.
- Part C of Policy KBR44 (Reg. 16 – KBR38), natural environment, has been deleted as feedback suggested that it would be difficult to apply in respect of minimising certain impacts of development on tranquillity.
- Trees, and the importance of protecting and maintaining them, have been a strong theme throughout the engagement. Nevertheless, some stakeholders felt that Policy KBR45 (Reg. 16 - KBR39) was too detailed in itself. This has been addressed by including the most important elements in the policy and moving details of Tree Management Plans to an Appendix E. The Arboricultural Association and the Woodlands Trust provided valuable comments on this policy which were largely incorporated.
- Involving people in planning and development decisions is an intrinsic part of the planning regime and is acknowledged to contribute to better outcomes. Feedback on Policy KBR48 (Reg. 16 - Policy KBR42), sustainable development and involving people, suggested it was less a matter of planning and more a matter of procedure. The policy has been significantly amended not deleted as it is felt necessary to address matters raised in the NPPF at paragraph 189 and the ‘Convention on access to information, public participation in decision-making and access to environmental justice in environmental matters’ (Aarhus Convention 1998). A similar approach in the Kentish Town Neighbourhood Plan was found to meet the Basic Conditions by that plan’s Examiner.

Stage vi: Finalising the Plan

- 2.47** On 22 May 2017, the same NPIERS accredited independent examiner provided a full health check of the amended Plan (dated 27 April 2017). A copy can be found in Appendix E. At the same time, further feedback was also sought from WCC to ensure that their input into the Regulation 14 consultation had been fully understood and reflected appropriately in the draft Plan.
- 2.48** The comments received were reflected in the Plan, in readiness to submit to WCC as set out in Regulation 15 of the Neighbourhood Planning Regulations 2012.
- 2.49** **Strategic Environmental Assessment screening report:** On 18 August 2017, the Forum submitted a screening report to WCC and the statutory bodies (the Environment Agency, Natural England and Historic England) to assist in the determination of whether or not the Knightsbridge Neighbourhood Plan would have significant environmental effects in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.50** The Forum's Screening Report concluded that the Plan would not be likely to have any significant environmental effects arising either individually or cumulatively. The Environment Agency by letter dated 18 September 2017, Natural England by letter dated 31 August 2017 and WCC by letter dated 22 September 2017 all confirmed that the Plan was not likely to have significant environmental effects.
- 2.51** In a letter dated 21 September 2017, Historic England raised concerns in respect of the wording of Policy KBR7 (Tall buildings) which it considered had the potential "to lead to significant environmental effects on some of London's most significant heritage assets". As a result, the Forum amended Policy KBR7 to better reflect its intention in drafting the policy. The Forum also re-screened the Plan and concluded that the Plan was not likely to have any significant environmental effects for the reasons contained in its screening report of 18 August 2017. Historic England, in a letter dated 6 October 2017 confirmed that following the amendments to Policy KBR7, it did not consider that the Plan was likely to have significant environmental effects. WCC, in an email dated 9 November 2017, confirmed that it was not altering its position on whether or not the Plan requires a strategic environmental assessment (dated 22 September 2017).
- 2.52** The Screening Report including the responses from the statutory bodies has been submitted to WCC at Regulation 15 stage as part of the evidence base for the Plan.
- 2.53** **Habitats Regulation Assessment screening assessment:** An HRA Screening Opinion was sought from Westminster City Council (WCC) in May 2017. This followed a consultation response from Natural England based on a draft of the Plan dated 27 April 2017. In a letter dated 9 June 2017, WCC expressed the opinion that the Plan is not likely to have significant impacts on European protected species or sites.
- 2.54** Following amendments to the Plan, the Forum prepared an updated HRA Screening Report dated 18 August 2017 which concluded that the amended Plan is not likely to have significant impacts on European protected species or sites. Natural England by letter

dated 31 August 2017 and WCC by letter dated 22 September 2017 confirmed that the Plan is not likely to have significant impacts on European protected species. The Forum commissioned an Ecological Data Search for the Area by Greenspace Information for Greater London CIC dated 1 September 2017 to support these confirmations.

- 2.55** The Screening Report including the responses from the statutory bodies has been submitted to WCC at Regulation 15 stage as part of the evidence base for the Plan.

3 Conclusion

- 3.1** The Forum has undertaken a very thorough engagement programme in order to develop its Neighbourhood Plan. It has set out a comprehensive vision and objectives, underpinned by a set of shared values. In developing the policies to achieve the vision and objectives, the Forum has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly. A preliminary and a full health check have provided an independent review of the Plan and feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to WCC.
- 3.2** This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.

Appendix A - Summary of findings of engagement activities

A1.0 Early discussions with stakeholders – to inform the draft Vision and Objectives

A1.1 The two workshops, with the Forum directors and Knightsbridge Association, led to the development of an initial Vision for the emerging Plan alongside 10 Objectives couched within five Themes:

Vision:

“Make Knightsbridge the most desirable and attractive residential and cultural area in London in which to live, work, study and visit”

Theme 1: Character

Objective 1: Enhance the special character of Knightsbridge e.g. architecture, low level buildings and recognition internationally as a centre of expertise and innovation in arts, science and design.

Objective 2: Enhance and restore historic features and improve the public realm.

Objective 3: Protect and enhance Hyde Park and Kensington Gardens Metropolitan Open Land (including Hyde Park Barracks land) i.e. the strip of land just inside Hyde Park.

Theme 2: Community

Objective 4: Promote the sense of community, e.g. mixed retail, sensible licensing hours and arrangements and meeting the day-to-day needs of residents, students, workers and visitors.

Objective 5: Protect and enhance existing residential unit size and height e.g. single occupancy houses and smaller and medium sized flats.

Theme 3: Culture

Objective 6: Create and maintain an environment that enables our world-class cultural and educational institutions to continue to thrive and enhance their world-class status and competitiveness.

Theme 4: Public spaces and services

Objective 7: Improve the working of Exhibition Road e.g. as a shared space and the heart of our Cultural Quarter.

Objective 8: Prioritise sustainable transport e.g. pedestrian, cycling and traffic hierarchy. Zero accidents. Shared space on residential roads.

Objective 9: Encourage superlative mass transit and utility infrastructure e.g. public transport, drainage and broadband.

Theme 5: Environment

Objective 10: Achieve the highest sustainability standards e.g. zero local emissions and greening.

A2.0 First exhibition – to inform the most important issues

- A2.1** Approximately 100 people attended the exhibition in February 2016 to learn about the emerging plan and comment on the draft Vision and Objectives. Views were also sought on non-policy “Neighbourhood Management” actions and spending of monies arising from planning obligations.
- A2.2** The engagement undertaken to inform the Plan largely reinforced the approach and endorsed many of the initial issues raised. However, there are were a number of areas where more work was needed in order to move forward.
- A2.3** Table B1 provides a traffic light summary identifying which themes and objectives need to be addressed before they could be progressed. ‘Green’ means that the approach taken to this point was appropriate and was endorsed, ‘amber’ means that more work was needed before it could be endorsed, and ‘red’ meant that there was a fundamental problem in taking the theme/objective forward. None of the themes or objectives were considered to warrant a red light.
- A2.4** One of the primary aims of the consultation at this stage was to consider whether the proposed vision, values and objectives underpinning the Plan were appropriate in light of the matters raised by the community. Certain issues were raised regarding the need for more work and refinement of certain objectives, in particular Objective 1 and Objective 7, as well as matters relating to neighbourhood management and spending priorities. It is notable that none of the themes or objectives were identified as having fundamental problems such that they should not be taken forward.
- A2.5** The detailed findings of the initial drop-in event held in February 2016 can be found on the Forum’s website: Consultation Report – 24 March 2016. The feedback led to a revised version of the Vision and Objectives as well as a series of Values to underpin these.
- ## **A3.0 Second exhibition – to gather feedback on the Top 75 actions and policies**
- A3.1** 90 comments were received at the second exhibition and a summary of the support for each of the revised objectives is shown in Table B2. The display boards from the second drop-in event held in July 2016, illustrating the emerging policies and objectives, can be found on the Forum’s website: Display Boards – 6 July 2016.

Table A1: Support for the revised Plan objectives

Section of the Plan	Support	Do not support
Vision	98%	2%
Values	89%	11%
1. Enhance character of Knightsbridge	95%	5%
2. Public realm and heritage features	93%	7%
3. Hyde Park and Kensington Gardens	91%	9%
4. Promote sense of community	85%	15%
5. Residential amenity and mix	93%	7%
6. Enable institutions to thrive	91%	9%
7. Improve workings of Exhibition Road	92%	8%
8. Prioritise sustainable transport	90%	10%
9. Superb public transport and utilities	95%	5%
10. Exemplar in sustainable city living	100%	0%
Neighbourhood Management	90%	10%
CIL spending	98%	2%
Proposed 20mph zones by 2018	95%	5%

A3.2 As a result of this round of engagement, the vision for Knightsbridge was crystallised as:

‘Make Knightsbridge the best residential and cultural place in London in which to live, work, study and visit’.

The values and objectives were finalised as follows:

Community, Conserving, Clean, safe and quiet, Iconic, Inspirational and International.

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

Appendix B - Preliminary independent health check of the draft Plan

The following preliminary health check of the 7 September 2016 version of the Plan was undertaken by Christopher Lockhart-Mummery QC on 27 October 2016, focussing on the emerging policies related to the Hyde Park Barracks, and the process for undertaking a Strategic Environmental Assessment.

Knightsbridge Neighbourhood Plan

Preliminary Healthcheck Note on

(1) Hyde Park Barracks &

(2) SEA

Hyde Park Barracks

1. The KNP proposals for HPB are in Policies KBR16a and KBR16b. In essence, they seek to resist the loss of the barracks use (save for restoration to parkland) and urge removal of the existing buildings, especially the Peninsular Tower. There are other more detailed criteria in the policies.
2. The position of Westminster City Council (WCC) is as follows. The letter dated 18 August 2016 from Lisa Fairmaner was directed to a previous version of the proposed policies, and therefore is not wholly reliable in relation to the revised proposals. However, it is claimed that there is a “strategic designation” for housing. It is stated that this is a “strategic policy”: paragraph 6.1. Their position is elaborated in paragraph 6.4. Paragraph 6.21 suggests that the Neighbourhood Plan should:

“(i) clarify that the preference is for the barracks to remain on the site for all of the reasons set out in the draft Plan, and

(ii) clearly define what development the community wish to see on the site, should the barracks ever leave, within the context of the existing designation in the City Plan. This could include the rearrangement of the massing of buildings on site to reduce the height of the existing Tower, creation of new routes and vistas across the site, the architectural relationship to the surrounding sites, relationship to the Royal Park and neighbouring heritage assets, as well as the character and heritage value of the two conservation areas”.

It is apparent that the latest version of the KNP is already a positive response to these suggestions.

3. The October 2016 response by Barry Smith (Appendix 1) states in paragraph 3.9 that HPB “...is designated as a strategic housing site in Westminster’s City Plan. This means that the site is of strategic importance to the delivery of the development plan over the plan period to 2026/7. The site is included in the Council’s 6-15 year list of future developable sites referred to in the final paragraph of policy S14”.

4. Turning to the City Plan, it seems that the only non-conformity issue taken relates to Policy S14. There is no claim (thus far) that the KNP Policies 16a and 16b are in conflict with other strategic policies. Indeed, it must be plain that they are wholly in accord with Policy S11 Royal Parks, and Policy S27, Buildings and Uses of International and National Importance. The limited extent of the alleged non-conformity, and the compliance with other directly relevant strategic policies, are important factors in the debate.

5. The relevant parts of Policy S14, Optimising Housing Delivery, are as follows:

"The Council will work to achieve and exceed its borough housing target set out in the London Plan.

Residential use is the priority across Westminster except where specifically stated.

The number of residential units on development sites will be optimised.

The Council will maintain a publicly available list of deliverable sites for housing development to ensure a continuous five year supply of deliverable sites with a 5% buffer, and 6-15 year lists of future developable sites".

The introductory text to Appendix 1 states:

"The sites set out in this Appendix are of strategic importance to the delivery of Westminster City Plan. It includes sites necessary for the delivery of major infrastructure projects, or for the regeneration of an area. It also includes major housing sites located within Flood Zone 3 and housing sites with the capacity for over 100 units, of which a failure to deliver within the plan period would have implications for the housing target and the housing trajectory".

Site 34 is part of HPB, the preferred use is Residential, and the Notes state:

"Change of use from barracks to residential, including full on-site provision of affordable housing and the full range of housing sizes".

Westminster's January 2016 schedule of housing supply provides for no residential yield in relation to HPB over the full 0-15 year periods.

6. It appears, from section 7 of the Knightsbridge and Other Crown Lands Act 1879, that the site of HPB is part of the Royal Parks and cannot be sold, without primary legislation. There are also severe practical restrictions on the potential for relocation of the barracks. I am not aware whether these restrictions, particularly the former, were known at the time of the processing of the City Plan. On the face of it, the preferred use of residential is not deliverable, and hence this part of the Plan should not have been found to be "sound". This may be why the language is simply of "preferred use", as opposed to there being a specific policy or allocation for a given number of dwellings on the site. In any event, the question of delivery must be highly relevant in the present context.

7. The relevant legal test for the KNP is whether it is “in general conformity with the strategic policies” of the City Plan. One notes the term “general”, and the reference to “strategic policies” which must denote all strategic policies relevant to the point at issue. As noted above, it seems that the only claim of non-conformity relates to Policy S14.
8. Returning to the relevant parts of this policy, it would be difficult for Westminster to assert a conflict with the first paragraph, especially where the current supply schedule does not specify any housing number for the site, and also bearing in mind that proposed Policies 16a and 16b would not rule out residential use. Conflict with the second paragraph would also be difficult to assert, particularly in the light of policies S11 and S27. Further, it would be difficult for Westminster to show clear conflict with paragraphs 3 and 4, for the reasons given in relation to the first paragraph.
9. The apparent inability for residential development to take place on the site is plainly a significant factor.
10. In conclusion, it is clear that convincing an Examiner that these policies comply with the basic conditions will have its challenges. In my view, however, the Forum would be justified in retaining them in the Plan, while taking account of any further relevant points made in due course by Westminster.

SEA

11. WCC are mistaken in contending that it is the duty of the Forum to undertake a screening exercise. Under paragraph 6(3) of Schedule 4B, WCC must consider whether the draft plan complies with section 38A, sub-section (6) of which relates to compliance with any EU obligation, i.e. including SEA.
12. This is why, no doubt, PPG is quite unambiguous on the point. It advises (as part of the revisions on 9 February 2015) as follows:

“The local planning authority, as part of its duty to advise or assist, should consider putting in place processes to determine whether the proposed Neighbourhood Plan will require a strategic environmental assessment. The qualifying body should work with the local planning authority to be sure that the authority has the information it needs”.
13. Accordingly, it is the role of WCC to undertake the screening process.

Appendix C - Examples of consultation material

Leaflet to promote the public exhibitions in February 2016

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

What should Knightsbridge be like 20 years from now?

**Whether you live, work or study in Knightsbridge or visit it,
we want to know what you think**

You are therefore invited to attend the following events:

Date: Friday 26 February and Saturday 27 February 2016

Time: Between 10am-2pm on both days

**Location: Foyer of the main building of Imperial College,
South Kensington Campus, Exhibition Road, London SW7 2AZ**

These are drop-in events so please come along at a time that suits you.

The Knightsbridge Neighbourhood Forum (KNF) was established in 2015 to give the community of Knightsbridge the opportunity to prepare a Neighbourhood Plan (Plan).

This is an opportunity that has not been given to communities before, with the final Plan ultimately having as much weight as the Westminster City Council plan when determining planning applications. In short, together, we have a chance to shape the future of our place.

The KNF has prepared a draft vision and objectives but we want to hear from you about the most important issues affecting the future of the Knightsbridge area. How should we amend or take forward the vision and objectives before we start drafting the Plan later in 2016?

To find out more about the Knightsbridge Neighbourhood Forum, please visit:

Web: www.knightsbridgeforum.org

Facebook: <https://www.facebook.com/KnightsbridgeForum>

Twitter: <https://twitter.com/KnightsbridgeNF>

Exhibition material from 7 January 2017

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

WHAT IS THE KNIGHTSBRIDGE NEIGHBOURHOOD PLAN?

Knightsbridge Neighbourhood Forum has published the first draft – known as the ‘Pre-Submission’ draft – of the Knightsbridge Neighbourhood Plan (the ‘Plan’).

The Plan articulates the community’s vision for Knightsbridge over the next 20 years and sets out policies and actions to achieve it. It has been developed following extensive engagement with residents, businesses, students, visitors and others and is underpinned by evidence from many sources.

The Plan comprises the following documents:

- Part One: Knightsbridge Neighbourhood Plan, 2017–2036
- Part Two: Knightsbridge Management Plan – proposed actions that are not planning policies
- Part Three: Knightsbridge Evidence Base – supporting evidence for Part One
- Executive Summary and further evidence and related information

You can download these Parts from our website:
<http://www.knightsbridgeforum.org/planning/consultation/>

Please read the documents and tell us what you think about the policies in the Plan. You can submit your views in the following ways:

By email to: consultation@knightsbridgeforum.org

Or by post to:

Chris Bowden
 Troy Navigus Partnership
 3 Waterhouse Square
 138 Holborn
 London EC1N 2SW

Responses must be received by 5.00pm on Wednesday 15 February 2017.

WHAT HAPPENS NEXT?

Once we have received comments, we may need to make changes to the draft Plan. It will then be submitted formally to Westminster City Council (WCC) who must organise another six week consultation. The Plan will then be examined by an Independent Examiner. If all goes well, a Referendum of local residents will take place later in 2017. Several weeks after a successful Referendum, WCC must ‘make’ the Knightsbridge Neighbourhood Plan, unless there is a legal challenge, which will become part of the Local Plan for Knightsbridge and apply when planning decisions are determined.



Appendix D – List of pre-submission (Regulation 14) consultees

Statutory consultees

Respondent	Response received?
British Telecommunications	No
Central London Clinical Commissioning Group	No
The Coal Authority	No
Environment Agency	Yes
Highways England	Yes
Historic England	Yes
Homes and Communities Agency	No
Mayor of London	Yes
National Grid	Yes
Natural England	Yes
Network Rail	No
Royal Borough of Kensington and Chelsea	Yes
Savills (UK) Ltd (for Thames Water)	Yes
Transport for London	Yes
UK Power Networks	No
Westminster City Council	Yes

Non-statutory consultees

Respondent	Description	Response received?
Arboricultural Association	National group	Yes
Battle McCarthy	Business, consulting engineering	Yes
Belgravia Neighbourhood Forum	Nearby Neighbourhood Forum	Yes
Bluepoint London	Business, electric charging points	Yes
Brompton Association and Prince's Gate Mews Residents' Association	Residents groups	Yes
Brompton Bicycles	Business (folding bicycles)	Yes, after deadline
Camfil	Business, air filtration	Yes
Chelsfield	Business, real estate	Yes
Cheval Property Management Limited	Business active in the Area	No
City of London Corporation	Local authority	No
Clean Air in London	Campaign group	Yes
Defence Infrastructure Organisation	Part of the Ministry of Defence	Yes
Drive Now	Business, car sharing	Yes
Ennismore Gardens	Individual residents	Yes - 1 x individual response from resident
Friends of Hyde Park and Kensington Garden	Membership organisation	No
Greater London Authority	Mayor of London's organisation	Yes
ICE Air Quality Taskforce	Membership body, civil engineers	Yes
Imperial College London	Educational establishment	Yes
Kensington Society	Local residents group	Yes
Knightsbridge Association	Local community group	Yes
Knightsbridge Business Group	Local businesses	Yes
Knightsbridge Residents Management Company Ltd	Local residents	Yes
Knightsbridge Green registered proprietors (by registered post)	Landowners	No
Licensed Taxi Drivers Association	Transport lobby group	Yes
London Cycling Campaign (Westminster Group)	Transport lobby group	Yes
London Taxi Company	Taxi manufacturer	Yes
Mayfair Neighbourhood Forum	Nearby Neighbourhood Forum	No
Onslow Neighbourhood Association	Residents group	Yes
Paxton's Head	Local public house	No
Pegasi Management Company Ltd	Local business	Yes
Pimlico Neighbourhood Forum	Nearby Neighbourhood Forum	No
Prince's Gate Mews Residents Association	Residents association	Yes

Respondent	Description	Response received?
RBKC	Neighbouring London Borough	Yes
Representative of resident owning properties in Knightsbridge Apartments	Resident/property owner	Yes
Knightsbridge Apartments	Resident and Chairman of the Resident Committee of The Knightsbridge at 199 Knightsbridge	Yes
Knightsbridge Apartments	Individual residents	Yes - 6 x individual responses from residents
10 Lancelot Place	Individual residents	Yes - 2 x individual responses from residents
Rutland Gate	Individual residents	Yes - 2 x individual responses from residents
Retired environment expert	Visitor	Yes
Royal Albert Hall	Cultural venue	No
Royal Commission of the Exhibition of 1851	Educational trust	Yes
The Royal Parks	Charity managing London's Royal Parks	No
Secretary of State for Defence (Michael Fallon)	Government Minister (at the time of writing)	No
Soho Neighbourhood Forum	Nearby Neighbourhood Forum	No
Tattersall's Tavern	Local public house	No
Tree Design Action Group	Environmental action group	No
Victoria Neighbourhood Forum	Nearby Neighbourhood Forum	No
Westminster Property Association	Property lobby group in central London	Yes

APPENDIX E – LETTER TO PRE-SUBMISSION (REGULATION 14) CONSULTEES

Dear Consultee

Knightsbridge Neighbourhood Plan – Pre-Submission Consultation (Regulation 14)

I am pleased to invite your views on the Knightsbridge Neighbourhood Forum’s proposals for a neighbourhood development plan and associated documents. I believe it is the first such plan in the City of Westminster.

This is a Pre-Submission Consultation in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended) (attached). The following consultation documents may be found at the link below on the Knightsbridge Neighbourhood Forum’s website:

- Part One: Knightsbridge Neighbourhood Plan, 2017-2036
- Part Two: Knightsbridge Management Plan – proposed actions that are not planning policies
- Part Three: Knightsbridge Evidence Base – supporting evidence for Part One
- Executive Summary and further evidence and related information

<http://www.knightsbridgeforum.org/planning/consultation/>

Please submit your responses to the consultation to:

Chris Bowden
Troy Navigus Partnership
3 Waterhouse Square
138 Holborn
London EC1N 2SW

Responses must be received by 5.00pm on Wednesday 15 February 2017.

If you do not want your response, including your name, contact details and any other personal information to be publicly available, please say so clearly in writing when you submit your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, this will not be considered as a confidentiality request.

I look forward to hearing from you.

Yours sincerely
Simon Birkett
Chair

Knightsbridge Neighbourhood Forum

APPENDIX F – FULL INDEPENDENT HEALTH CHECK OF THE DRAFT PLAN

F1.1 The following health check was received from Christopher Lockhart-Mummery QC on 23 May 2017. It provides comments on an intermediate draft of the Plan dated 27 April 2017 that sought to address most comments received on the Regulation 14 draft Plan. Where policy numbering has been referenced by Christopher Lockhart-Mummery QC, it refers to numbering in the 27 April 2017 version of the draft Plan. The comments received in the health check were then reflected in the Regulation 16 version of the Plan and cross-referenced as such in the Consultation Summary.

**KNIGHTSBRIDGE NEIGHBOURHOOD
NEIGHBOURHOOD PLAN
2017-2037
Regulation 16
Draft: 27 April 2017
HEALTH CHECK REPORT
By
Christopher Lockhart-Mummery QC
23 May 2017**

Introduction

1. This Report follows my health check review of the Regulation 16 version (27 April 2017) of the Knightsbridge Neighbourhood Plan 2017-2037. The plan has been prepared by the Knightsbridge Neighbourhood Forum, the Qualifying Body.
2. In undertaking the review I have had close regard to the NPIERS Template for health check reviews, but have not followed it slavishly.
3. The main documents with which I have been supplied and have considered are:
 - The Neighbourhood Plan (NP)
 - The Knightsbridge Management Plan
 - The Basic Conditions Statement
 - The Evidence Base
 - The Consultation Statement
 - The SEA draft Scoping Report.
4. The existing statutory development plan comprises the London Plan, Westminster's City Plan (November 2016) – referred to as the WCP – and the saved policies of the Unitary Development Plan (UDP). I have had close regard to the relevant policies in these Plans, especially those helpfully referenced under each policy of the NP.
5. I have been very familiar for many years with the area, and have therefore not undertaken a specific site visit.
6. In the light, in particular, of the consultation statement, it appears to me that the NP has been the subject of appropriate consultation and publicity thus far, and that there has been a programme of community engagement proportionate to the scale and complexity of the NP.

Overview

7. The NP is a very impressive document. It has been informed by a substantial evidence base and widespread consultation. In many respects it is an extremely ambitious Plan, a topic to which I will return.
8. I see no issues around compatibility with human rights or EU obligations.

9. In accordance with good practice, this Report is likely to be supplied to the Examiner appointed to carry out the examination of the Plan in due course. I stress that this report is merely a health check. The views expressed are my own. The Examiner will have duties to form his/her own view on the statutory tests, and will not be bound in any way by any expression of opinion in this Report.

Guiding principles and good practice

10. Drawing on advice from the NPPF and PPG, I regard the following as of particular relevance in relation to this NP:

- (1) The Plan should not seek to impose restrictions or obligations that might prejudice the certain and viable delivery of development.
- (2) Policies should be clear, unambiguous, concise and precise. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.
- (3) There is no need to repeat other policies of the development plan. Where a proposed NP policy covers the same ground as an existing policy or policies, there should be clear justification for additional or more detailed policy.
- (4) The NP policies, especially those concerned with sustainability issues (“green” policies) should not be too ambitious or technical.
- (5) Care should be taken in relation to matters which are in reality management issues, not realistically deliverable from development proposals.

11. In my view of the NP (below) I have been closely guided by the above. As will become clear, it is the inconsistency with one or more of the above matters that has been the primary cause of the suggestions I have made for changes. In my view, it will be necessary to respond to the criticisms I have made below for there to be reasonable confidence that the NP will pass Examination.

Other matters

Basic Conditions Statement

12. Paragraphs 1.1-1.3 wrongly state that the basic conditions are required by the Regulations. In its reference to the current development plan, paragraph 2.10 omits the UDP.

Evidence Base

13. Paragraph i.4 wrongly states that the NP must be in general conformity with the NPPF.

Review of the NP

14. The remainder of this Report contains my view of the NP, section by section.

INTRODUCTION, THE LOCAL CONTEXT, VISION, VALUES AND OBJECTIVES

These sections are excellent in terms of scene-setting for the NP. I have the following, relatively minor, points.

On page 2, Figure 1 is indistinct. It would be helpful, if possible, to have a OS-based plan in the NP, indicating the names of the main streets.

Paragraph i.2 states that the plan period is to 2036, contradicting the front cover of the NP.

Paragraph ii.3 – would it be possible to show the Core CAZ on a plan?

Policy KBR1 (KBR1 in Reg 16 Plan)

This contains the first reference to the Policies Map. This Map should be explained in the Introduction. I find the two Policies Maps at pages 71-72 to be at too small a scale, and hence appearing too “busy”.

The policy also refers to the Character Areas. Again, could there be an earlier explanation of their origin, and how they were formulated?

In my view Policy KBR1 is appropriate.

Policy KBR2 (KBR2 in Reg 16 Plan)

While there is some duplication of existing policy, I think that the described local circumstances justify this policy.

Policy KBR3 (KBR3 in Reg 16 Plan)

I take the same view about this policy. Why is “and/or” between b. and c.?

Policy KBR4 (KBR4 in Reg 16 Plan)

This policy as presently drafted relates in large measure to the highway. It should be revised so as to be directly relevant to development.

Policy KBR5 (KBR5 in Reg 16 Plan)

This is headed Local Views, but only one is referred to.

Policy KBR6 (KBR6 in Reg 16 Plan)

This seems appropriate.

Policy KBR7 (KBR7 in Reg 16 Plan)

The matters addressed here are addressed in Policies 7.7, 7.8, and 7.17 of the London Plan and DES3 and 9 of the UDP. What is the justification for this additional policy? If there is justification, it needs to be set out.

Policy KBR8 (KBR8 in Reg 16 Plan)

This is essentially a highway/public realm policy. It should be confined to land use and development, e.g. paragraph D.

Policy KBR9 (KBR9 in Reg 16 Plan)

This seems appropriate.

Policy KBR10 (KBR10 in Reg 16 Plan)

Why is paragraph A necessary in the light of policy DES6(B) of the UDP?

Policy KBR11 (KBR11 in Reg 16 Plan)

I regard this as appropriate, notwithstanding some duplication of existing policy.

Policy KBR12 (KBR12 in Reg 16 Plan)

I suggest that there be a cross-reference in the text to the justification for the LGS in the Evidence Base.

Policies KBR13-15 (KBR13 and KBR14 amalgamated into KBR13 in Reg 16 Plan; KBR15 renumbered as KBR14 in Reg 16 Plan)

For reasons which follow, I deal with these policies together. They are particularly important topics for the NP. I have a number of queries and concerns.

First, there are very strong policies in the London Plan, WCP and UDP relating to the protection of MOL. Policies also relate to the Royal Parks, conservation areas, design etc. If there is a justification for the repetition of these policies (which I doubt) it is not made.

Second, it seems to me – perhaps as a result of the first point – that these policies are too long and complex.

Third, I am not aware (and it is not explained) as to whether, realistically, any development would be proposed in this part of the MOL save that relating to the area of the Knightsbridge Barracks.

There is plainly cogent justification for additional local policies relating to the area of the Barracks. I would hope that these three policies could be reduced to one, essentially relating to the Barracks. The sort of matters which seem to me to be entirely justified for inclusion in the NP would include:

- permeable routes
- tranquillity
- no commercial uses, even ancillary
- control on height, bulk and massing
- identified views from Hyde Park and Kensington Gardens
- provision of open space and edge softening
- not exceeding existing footprint
- parking.

I am aware that there have been issues of general conformity relating to policies for the Barracks. In the present formulation, especially if the above recommendations were accepted, I do not see a controversial general conformity issue. As was stated in the case of *Maynard v. Chiltern DC* [2015] EWHC 3817 (Admin) the requirement of “general conformity” does not allow a local planning authority to decide, as a matter of judgment, that a very tight degree of conformity is justifiable (so as to avoid conflict with a local plan policy).

If retained, footnote 2 on page 28 should be to the case of *Timmins*.

Policy KBR16 (Renumbered as KBR15 in Reg 16 Plan)

In the light of the very strong TACE policies, is paragraph C necessary?

Policy KBR17 (Renumbered as KBR16 in Reg 16 Plan)

While there is duplication of existing policies here, I think the policy is appropriate in the local context, and it has specific application to Local Roads. In paragraph A.a. I think “noise levels” should be “noise creating uses”.

Policy KBR18 (Renumbered as KBR17 in Reg 16 Plan)

This seems appropriate.

Policy KBR19 (Renumbered as KBR18 in Reg 16 Plan)

This seems appropriate. In the second sentence of paragraph A, “their” should be “its”.

Policy KBR20 (Renumbered as KBR19 in Reg 16 Plan)

This seems appropriate. (A reference to section 15 of the Neighbourhood Planning Act 2017 might be appropriate).

Policy KBR21 (Renumbered as KBR20 in Reg 16 Plan)

This seems appropriate.

Policy KBR22 (Renumbered as KBR21 in Reg 16 Plan)

The special attention given to 1 Knightsbridge Green is not explained here or in the Evidence Base. In paragraph C.b, how is it practical to restrict servicing to electric vehicles only?

Policy KBR23 (Renumbered as KBR22 in Reg 16 Plan)

As appears from the supporting text, it seems to me that this is really a management matter as opposed to a land use policy (albeit that it is expressed as such). WCP Policy S44 seems adequate.

Policy KBR24 (Renumbered as KBR23 in Reg 16 Plan)

I have considerable concerns about this policy. In paragraph A, how is it possible to avoid emissions, noise and vibration during construction? Much of paragraph B is not appropriate for planning conditions. In paragraph C, the terms of Appendix B are not appropriate for planning conditions. Generally, it is not explained why the WCC Code of Construction Practice is insufficient.

Policy KBR25 (Renumbered as KBR24 in Reg 16 Plan)

This seems appropriate.

Policy KBR26 (Renumbered as KBR25 in Reg 16 Plan)

I have a number of concerns over this policy. Most restorations of existing residential properties to their original form decrease rather than increase the number of residential units. This apparent contradiction in the policy is not explained. What is wrong with WCP Policy S14?

Policy KBR27 (Renumbered as KBR26 in Reg 16 Plan)

This seems appropriate, subject to two minor changes. Having regard to paragraph A, it would seem that the heading should be changed to "Policies" rather than "New Development". In paragraph B, the second reference to Strategic Cultural Area should be deleted.

Policy KBR28 (Renumbered as KBR27 in Reg 16 Plan)

This does not appear to be a land use policy, as opposed to a management matter.

Policy KBR29 (Renumbered as KBR28 in Reg 16 Plan)

This seems appropriate.

Policies KBR30-31 (Relevant parts of KBR30 included in revised KBR29 in Reg 16 Plan; relevant parts of KBR30 included in revised KBR28 in Reg 16 Plan)

Same comment as for policy KBR23.

Policy KBR32 (Renumbered as KBR31 in Reg 16 Plan)

This seems to be a legitimate further development of existing policies, and would conform to the NPPF. (While not, probably, a matter for mention in the NP, the recent case of *Khodari v. Royal Borough of Kensington and Chelsea Council* [2017] EWCA Civ. 333 has declared that a section 106 agreement cannot prohibit applications for car parking permits. This will clearly have a material effect on the effectiveness of car-free policies).

Policy KBR33 (Renumbered as KBR32 in Reg 16 Plan)

This seems generally appropriate. In relation to paragraph B, how is provision for taxi ranks deliverable from development?

Policy KBR34 (Renumbered as KBR33 in Reg 16 Plan)

This seems appropriate.

Policies KBR35-37 (KBR35, 36 and 37 renumbered as KBR34, 35 and 36 respectively in Reg 16 Plan)

I take these policies together. They are, essentially, concerned with reduction in energy use and improvement of air quality, topics for which the authors of the NP have particular expertise and enthusiasm. If I were the Examiner, I would regard these policies as too ambitious, too complicated (“urban heat island effects”?) and tending to duplicate existing policies.

Policy KBR38 (Renumbered as KBR37 in Reg 16 Plan)

This seems appropriate.

Policy KBR39 (Renumbered as KBR38 in Reg 16 Plan)

Paragraph A of the policy seems appropriate. Paragraph B should be deleted, since MOL is dealt with elsewhere.

Policy KBR40 (Renumbered as KBR39 in Reg 16 Plan)

This seems generally appropriate, but is over-prescriptive in its present form.

Policy KBR41 (Renumbered as KBR40 in Reg 16 Plan)

This seems generally appropriate. I am doubtful as to the practicality of paragraph B.c. Paragraph D is repeated in paragraph E.

Policy KBR42 (Renumbered as KBR41 in Reg 16 Plan)

I have concerns as to this policy. First, it is not explained as to why the WCP and UDP policies are not adequate. In any event, paragraph A is not precise.

Policy KBR43 (Renumbered as KBR42 in Reg 16 Plan)

This repeats the NPPF and is not necessary.

Policy KBR44 (Policy has not been included in Reg 16 Plan)

This is appropriate for the Management Plan, not the NP.

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Landmark Chambers
23 May 2017