

Where amendments to text are proposed, deletions are shown by text being struck through (~~sample~~) and new text is shown as being underlined and in bold (sample).

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
1.	KNP62	WCC	As drafted, the plan does not support the strategic development needs of the City set out in the Local Plan (Westminster City Plan and saved UDP policies), or positively support local development. Instead it undermines strategic elements of the Westminster City Plan promotes less growth than the current development plan (specifically Hyde Park Barracks) and taken as a whole would be likely to impede sustainable growth. It also introduces a road system that is not consistent with the WCC approach.	<p>The KNP encourages sustainable growth. It is a mistake to assume that an emphasis on growth which is compatible with a healthy environment is the same as a lack of support for development.</p> <p>KNP is required to be in general conformity with the strategic policies of the development plan. In this regard, these are only those in the City Plan and do not include the saved UDP policies which do not contain "strategic" policies. The City Council's own publicly stated position is that the policies contained within the UDP are not strategic policies but rather "management policies". In the context of the City Council revising its local plan following the adoption of the NPPF, it states that "The first review stage has already been completed when Westminster's City Plan: Strategic Policies replaced the Core Strategy in November 2013. The second stage will insert city management policies into Westminster's City Plan, to replace those policies currently in the UDP." (see https://www.westminster.gov.uk/unitary-development-plan-udp)</p> <p>KNF accepts that the policy concerning return of the Hyde Park Barracks site to parkland (in Policy KBR14) should be amended. This is addressed in response to the WCC rep on KBR14 below.</p> <p>The point about introducing a road system not being consistent with the WCC approach is addressed in Entry 14.</p>

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2.	KNP62	WCC	It is likely to have this effect by seeking to impose onerous requirements on development proposals that have not been tested for their viability impact, and by seeking to impose procedural requirements that are a matter for the local planning authority to determine in accordance with national legislation and guidance. This includes matters that are not only beyond the scope of neighbourhood plans (and, indeed, land use planning), but also have significant resource implications on the City Council as the local planning authority (e.g. the proposed Knightsbridge Code of Construction Practice and Knightsbridge Community Engagement Protocol).	<p>Similarly, it is a mistake to regard requirements which ensure good, sustainable development as “onerous”. They are there to encourage sustainable development. They are positively welcomed by a large number of stakeholders. A number of responses from stakeholders working in the property development and construction sector support our policies and do not raise concerns about any “viability impact”. The Forum draws the Examiner’s attention to responses from BESA, Clean Air in London, Cundall, EIC and MSP. This issue has also been addressed in the Sustainability Report submitted at Regulation 15 stage, in particular the good viability of development in the neighbourhood area.</p> <p>For the purposes of development management, the KNP provides clear policies and is clear about the relationship between it and matters not within the remit of planning policy. It is important to note that the emerging New London Plan consultation draft¹ recognises the need for a more integrated approach to planning and licensing, as has the House of Lords Select Committee on the Licensing Act 2003.</p> <p>The Forum asks the Examiner to note the government guidance on neighbourhood plans (https://www.gov.uk/guidance/neighbourhood-planning--2) which states that, “...Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex.” The KNF has followed this advice by setting out neighbourhood</p>

¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/>

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				management in a separate document from the policies i.e. Part Two.
3.	KNP62	WCC	The plan includes policy criteria that do not relate to the development and use of land and therefore cannot be controlled through the determination of planning applications, and duplicates matters that already benefit from substantial policy coverage.	<p>As we have said, the KNP conforms to Government guidance.</p> <p>There is no duplication because policies in the UDP are not strategic. The KNP addressed these matters with locally-specific policies which reflect the specific issues and opportunities relevant to the neighbourhood area. KNP has also sought to bring some matters, currently addressed in part in Supplementary Planning Guidance (SPG), into a locally-specific policy framework.</p>
4.	KNP62	WCC	As set out in paragraph 7 of the NPPF, sustainable development includes an economic development dimension. However, the plan does little to ensure that "sufficient land of the right type is available in the right places and at the right time to support growth and innovation" (NPPF paragraph 7). Instead it seeks to restrict development opportunities, through matters such as being very prescriptive on the use of materials, resisting any alterations to existing tall buildings, introducing additional development constraints such as a new views and new stress areas and limiting redevelopment opportunities to the footprint and height of existing buildings (Hyde Park Barracks). The plan's strong emphasis on the environmental and social aspects of sustainable development means that it does not meet the requirements of NPPF	<p>The evidence used to underpin the KNP is more than adequate to justify the approach taken. Overall, the KNP does not restrict development but aims to shape it. Neighbourhood plans are not required to allocate sites for development. The City Plan has allocated development sites and the KNP provides locally specific context to ensure development enhances the sustainability of Knightsbridge, allowing it to thrive economically, socially and environmentally.</p> <p>The language used in the policies is important – commonly, policies will 'encourage' development to address a certain matter rather than requiring it to do so. This approach is considered to provide flexibility for development to address all the expectations placed upon it by planning policy at the same time as raising ambition for good development.</p>

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			paragraph 8, that "to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously".	
5.	KNP62	WCC	In parts, the use of wording in policy criteria is also ambiguous, meaning it will be difficult to meaningfully apply to development proposals; undermining any scope that does exist for sustainable development.	The Forum has suggested minor changes to the text of the KNP, where it is considered appropriate, to add further detail to the policies and to respond to the comments received through the Reg 16 consultation.
6.	KNP62	WCC	Paragraph 0.3 does not clearly set out what the role of the development plan is in determining planning applications, that if adopted the neighbourhood plan would form part of the development plan (alongside the City Plan and London Plan). Clarity on this issue is fundamental for the scope and content of the document.	The Forum suggests the following addition to the start of paragraph 0.3: <u>"Planning applications must be determined in line with the development plan, unless material considerations indicate otherwise. A neighbourhood plan forms part of the development plan once it has been adopted and sits alongside the Westminster City Plan and the London Plan."</u>
7.	KNP62	WCC	KBR1: It is unclear from policy wording in paragraph b if the intention is to restrict building materials in the identified character areas to prescribed materials, or describe the existing character in these areas that proposals should respond to. Any intention to restrict materials to those quoted overstates the degree of homogeneity that exists in these areas, and is contrary to design guidance in NPPF paragraphs 56-65. Policy and supporting text should therefore clarify that identified areas are 'characterised' by some common materials, but that not only these materials would be acceptable. Policy should also make clear	The Forum agrees that the policy should be improved and suggests that Policy KBR1 is amended as follows: <u>"b. For each of the respective Character Areas identified on the Policies Map, proposals should showing respect in the design and usechoice of materials identified in the Character Area. The Character Areas are: which enhances the following:- Area 1 ('Kensington Squares'); —terraced buildings in stock brick, stucco, half stucco or stone. Area 2 ('Albertopolis'); and —buildings in red brick or terracotta, on large plots and of a large scale. Area 3 ('Knightsbridge Green and Albert Gate')—red brick, large-scale buildings, with Knightsbridge Green having a singular townscape appearance and Albert Gate a mixed townscape appearance."</u>

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			that character areas are identified on the policies map.	<p>In order to add further detail to the policy, a new penultimate sentence should also be added to para 1.3 as follows:</p> <p><i>“...help to describe the rich design and heritage of Knightsbridge. <u>The predominant designs, materials and other features of each Character Area are described in Part Three of the Plan (Knightsbridge Evidence base).</u> The Royal Parks Conservation Area covers part of the Neighbourhood Area.”</i></p> <p>There was explicit support given to Policy KBR1 at Reg 16 stage by the Exhibition Road Cultural Group (73), Matthew Bennett (of the Soho Society) (48), the Belgravia Neighbourhood Forum (75) and private individuals (17, 25 and 67).</p>
8.	KNP62	WCC	<p>KBR2: Policy largely duplicates the requirements of the Council's existing shopfronts, blinds and signs SPG design guidance and therefore unnecessary.</p> <p>What is locally specific is overly prescriptive e.g. requirement for 'subtle white lighting'.</p>	<p>The impact that commercial frontages, signage and lighting have on the Neighbourhood Area was identified as a problem that needed to be addressed in order to create a better environment in which to work, study and live. The Forum considers that Policy KBR2 achieves this in a locally-specific way that is more appropriate than the SPG. Whilst there is an SPG at the Westminster level on design, it was felt that a neighbourhood plan policy is necessary because some new shopfronts in Knightsbridge have consistently demonstrated poor quality and design, despite the presence of the SPG. The KNP wishes to ensure that commercial properties contribute to the essence of what makes Knightsbridge special and recognisable, going beyond the more generic guidelines set out in the SPG.</p> <p>The Forum notes this and proposes the following change to Policy KBR2(d):</p>

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			<p>It is also unclear if criterion d is referring to shop lighting or architectural lighting.</p> <p>Criterion f may have unintended consequences in effectively supporting security measures such as CCTV that is not sensitively incorporated.</p>	<p><i>"...It should be subtle white lighting that highlights the character of the property and enhances the local setting."</i></p> <p>The Forum's intention was for Part (d) to relate to architectural lighting. KBR2(d) should therefore be amended to read: <i>"d. If external lighting of a shopfront or commercial premises is proposed, this should involve lightslamps complying with..."</i></p> <p>The Forum believes that the wording of Part (f) will contribute to retaining and enhancing the local character of the area. Indeed, the policy explicitly supports security measures such as CCTV which retain and enhance the character of the area.</p> <p>There was explicit support given to Policy KBR2 at Reg 16 stage by TfL (13), the Knightsbridge Business Group (68), Chelsfield (84) and private individual (67).</p>
9.	KNP62	WCC	<p>KBR3: Policy largely duplicates the requirements of saved UDP policy DES7, is not locally specific, and therefore unnecessary.</p> <p>Furthermore, it is not clear if 'heritage lights' means 'heritage street lights' as defined in the glossary.</p>	<p>The heritage features of the boundary railings and walls were identified as a specific feature which made Knightsbridge a special place. The Forum considers that the policy is locally-specific because it encourages improvements to existing railings and walls. By contrast, UDP Policy DES7 (a non-strategic policy) only addresses the loss of existing railings and walls or creation of new railings and walls.</p> <p>The Forum confirms that 'heritage lights' does mean heritage street lights as defined in the Glossary. The Forum proposes to add the following wording to the end of the Glossary definition:</p>

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				<p data-bbox="1189 236 1883 300"><u>“...Some of these street lights have been listed by Historic England”.</u></p> <p data-bbox="1189 347 1883 547">The Forum considers that there would be greater clarity as to the respective roles of Policies KBR3 and KBR4 if reference to heritage lights was taken out of KBR3 so it was only referred to in KBR4. If the Examiner agrees with this approach then the following amendments should be made to KBR3:</p> <p data-bbox="1189 563 1883 627"><i>“...are encouraged to restore heritage features such as heritage lights, railings, walls or columns...”</i></p> <p data-bbox="1189 675 1883 730">The following addition should be made to the end of para 1.9:</p> <p data-bbox="1189 746 1883 802"><i>“...part of the boundary. <u>Examples are shown in Part Three of the Plan (Knightsbridge Evidence Base).</u>”</i></p> <p data-bbox="1189 850 1883 906">KBR4 should be amended, in order to reflect the glossary definition, to read:</p> <p data-bbox="1189 922 1883 978"><i>“...restore heritage features such as heritage <u>street</u> lights, railings...”</i></p> <ul data-bbox="1189 1034 1883 1374" style="list-style-type: none"> <li data-bbox="1189 1034 1883 1273">• For consistency, in Part 3: Amend para 1.17: Details such as the use of wood for plaques and other signage as opposed to plastic, <u>and</u> the retention of corning and pilasters, and the installation of subtle white lighting that highlights the character of the property and enhances the local setting, contribute to this essence of Knightsbridge. <li data-bbox="1189 1321 1883 1374">• Delete photo and caption: Example of original lamp feature on boundary wall.

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			<p>Supporting text should also make clear that the placement and maintenance of street furniture is usually outside the control of planning.</p>	<p>Some of the street lighting in the Knightsbridge Neighbourhood Area is listed and controlled/protected through the planning system. A plan showing the location of street furniture that has been listed by Historic England, such as street lighting columns and wall mounted street lighting units has been published by WCC (see Figure G at the end of this document which should be included in the Part Three Evidence Base if the Examiner considers it appropriate). These plans show that there are a considerable number. The Forum can provide an Excel spreadsheet with more details. The Forum considers that reference to what is outside the control of planning is unnecessary.</p>
10.	KNP62	WCC	<p>KBR4: Whilst the policy intention is understood, there may be limited circumstances where it applies as many proposals will be permitted development. To clarify the aspirational nature of the policy, it may be useful to replace 'where applicable' with 'where possible'.</p> <p>While the council supports removal of kiosks and utility cabinets that are no longer required, there are limits to the extent that new development can deliver this – which is likely to involve considerable costs for developers.</p>	<p>The Forum agrees with this and suggests that Policy KBR4 is amended as follows: <i>"In particular, proposals should where possible applicable..."</i></p> <p>The Forum welcomes WCC's support for the removal of kiosks and street cabinets that are no longer required. There could be major benefits if old telephone kiosks and utility cabinets were removed to widen the effective width of footways. Therefore the wording should be retained. It contributes to the social role set out in paragraph 7 of the NPPF by creating a high-quality built environment. In light of the suggested amendment above, the policy respects the</p>

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			<p>Criterion (a) appears to duplicate policy KBR3.</p>	<p>difficulties identified by the Council. This point is therefore noted but no amendment is considered necessary.</p> <p>The Forum has suggested amendments to KBR3 so that it does not refer to heritage lights and therefore also suggests that KBR4 removes reference to railings, walls or columns. This then removes duplication. The following amendments should be made to Policy KBR4(a):</p> <p><i>“a. restore or replace damaged heritage street lights, railings, walls or columns;</i></p> <p>The following addition should be made to the end of para 1.10:</p> <p><i>“...part of the boundary. Examples are shown in Part Three of the Plan (Knightsbridge Evidence Base).”</i></p> <p>The following amendment should be made to para 1.11:</p> <p><i>“1.11 Over time, the increasing activity in the Area has created the need for more investment to improve and maintain various aspects of the street scene. This includes street furniture, paving, railings and lighting...”</i></p> <p>To ensure consistency, the following amendments would also need to be made to the Part 3 document:</p> <ul style="list-style-type: none"> • Amend para 1.23 and the subsequent photos should be moved to follow para 1.17. • Amend para 1.19. <i>“Many stakeholders were keen to tackle those parts of the public realm that were either damaged or missing with a particular focus on broken paving and heritage street lights lamps and tattiness.”</i>

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			<p>Reference in paragraph 1.12 to York Stone, when read alongside requirements in criteria d has cost implications that have not been viability tested. In practice this would only be appropriate where York Stone was there in the first place – as highway authority the City Council would not support its use outside the areas identified in its “Westminster Way” supplementary planning guidance because of its substantial cost. We would suggest omission of this reference.</p>	<ul style="list-style-type: none"> • Amend para 1.20. “The general quality of pavements and streets in the Area is poor and ranges from broken paving stones (e.g. caused by large construction vehicles) to redundant and dirty telephone boxes and poorly maintained or broken street signs, heritage street lightings and street furniture...” • Amend photo caption: “Examples of missing heritage street lights lamps and poor quality electrical cabinets” • Amend para 1.23: “Residents have expressed a preference for the round-shaped lamp light fittings along Local Roads, and square-shaped street lamp light fittings around Local Green Spaces. It is important that lighting from street lamps is subtle and in character with the surrounding area. It is also important to take into account the height of new street lights lamps to ensure, for instance, that they do not encroach on upper floor windows in smaller Local Roads.” <p>The Forum agrees with this and suggests that the second sentence of paragraph 1.12 (which starts, “A common example in Knightsbridge...”) is deleted.</p> <p>The following amendment should be made to the second sentence of para 1.12: “...In addition, heritage railings and heritage street lights lamps in the Conservation Areas...”</p>

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				There was explicit support given to Policy KBR4 at Reg 16 stage by TfL (13) and private individuals (25 and 67).
11.	KNP62	WCC	<p>KBR5: Neither the foreground or background of the suggested view is considered worthy of protection in this way, and a lack of justification has been provided of the criteria used to designate the view, and how this confirms with guidance on local views given in UDP policy DES15. This states that "Local views... can be of natural features, skylines, landmark buildings and structures, groups of buildings, parks, open spaces, streets and squares. They are of local significance, making a valuable contribution to the character of the local area."</p> <p>Numerous examples exist across London of streets of attractive residential and commercial properties, which already benefit from protection through design and heritage policies. Furthermore, no mention is made of the Peninsular Tower of Hyde Park Barracks, that is the focus of the view (despite its acknowledgement in Part 3: Knightsbridge Evidence Base).</p> <p>This lack of clarity about the particular features of the view that are considered to merit this degree of special protection means that this policy is unlikely to be effective in taking planning decisions.</p> <p>Paragraph 44 of the NPPG on neighbourhood planning states their role: "should support the strategic development needs set out in</p>	<p>This view was identified through consultation as an important local view in the neighbourhood area that needs protection. The Forum considers that the reasoned justification in the Part One KNP, read together with the supporting evidence in the Part Three Evidence Base is sufficient to justify inclusion of this view in the policy. At Reg 16 stage, there was expert support from Francesco Brenta, an architect with his business premises in Montpelier Street, who made reference to this being an 'intact streetscape'. The Forum considers that it would be helpful to make the following amendments:</p> <p>i. To the third sentence of paragraph 1.13 of the Plan to read: <i>"This is the view north along Montpelier Street which offers an unusually long vista and intact streetscape of elegant late Georgian and early Victorian residential..."</i></p> <p>ii. To paragraph 1.32 of the Part Three Evidence Base to read: <i>"In this respect, the the intact streetscape of elegant late Georgian and early Victorian properties captures the high quality residential 'essence'..."</i></p> <p>There was explicit support given to Policy KBR5 at Reg 16 stage by KRMC (57).</p>

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			<p>the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies... Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan." As Knightsbridge Barracks is allocated as a strategic site for development in the adopted City Plan, the proposed designation could negatively impact on this designation, contrary to the purpose of neighbourhood plans.</p> <p>We would suggest deletion of this policy.</p>	
12.	KNP62	WCC	<p>KBR6: The identification of buildings and structures on the policy map (or inset maps) within the plan would enhance its usability, particularly given earlier comments that part 3 will not form part of the development plan.</p> <p>Reference to DES9(C) appears inaccurate and should be DES9(B).</p>	<p>The Forum agrees with this and has suggested amendments to the Policies Maps at the end of this document. The Forum also wishes to note that the Part Three document must be read alongside Part One of the development plan, and because it forms part of the evidence base it is relevant, particularly where an applicant wants to justify departure from a policy.</p> <p>The relevant references are to both DES9(B) and DES9(C). The Forum proposes, for simplicity, that reference should simply be made to DES9. Therefore, Policy KBR6 should be amended as follows: <i>"...should meet the requirements of Westminster UDP Saved Policy DES9(C) (Conservation areas):..."</i></p> <p>There was explicit support given to Policy KBR6 at Reg 16 stage by the Belgravia Neighbourhood Forum (75) and private individual (41).</p>

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13.	KNP62	WCC	<p>KBR7: It is unclear what type of alterations criterion B is seeking to restrict. Any attempt to refuse any alterations to existing buildings taller than their surroundings is highly prescriptive and contrary to NPPF requirements to promote sustainable development.</p> <p>Furthermore, criteria B(e) duplicates criteria B(d).</p> <p>Criterion C repeats requirements already established through London Plan Policy 7.7 and is unnecessary.</p>	<p>The Forum notes this and suggests that Policy KBR7(B) is clarified through the following amendment: <i>"...tall buildings, including the alteration of addition of floors <u>to existing tall buildings, will not be permitted...</u></i>"</p> <p>The Forum agrees that the policy should be simplified by incorporating the reference to the view into KBR7(B)(d) as follows: <i>"(B)(d) significant or important views, both strategic and local, including townscape views, and historic skyline features and the view north along Montpelier Street; or e. the view north along Montpelier Street (identified in Policy KBR5); or...</i>"</p> <p>The Forum considers that Part (C) provides important clarification of the key considerations for tall buildings in Knightsbridge, particularly given the significant number and value of heritage assets in the Area and the extent of public realm issues identified elsewhere in the KNP. It should not therefore be deleted.</p> <p>There was explicit support given to Policy KBR7 at Reg 16 stage by Historic England (39) (and also in its letter dated 6 October 2017), the Royal Parks (56), KRMC (57), the Knightsbridge Association (80), Brompton Residents' Association (98), Matthew Bennett (of the Soho Society) (48), the Belgravia Neighbourhood Forum (75) and private individual (41).</p>

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14.	KNP62	WCC	<p>KBR8: It needs to be recognised that the roads in the neighbourhood form part of a borough- (and London-) wide network and piecemeal local changes can have major implications elsewhere. This is an area where the need to focus on land use matters and to conform to strategic policies is particularly important. Criterion A's support for more pedestrian space at the expense of vehicular traffic needs to be considered in the context of analysis of road delays which shows that it is the restriction of capacity which is a substantial factor in generating congestion.</p> <p>Criterion B appears to relate to proposals not under the Council's control – since any reduction of carriageway from the strategic road network would be a matter for TfL to determine. Furthermore, as worded it is overly restrictive since any reduction in carriageway is likely to result in some increase in traffic congestion. If the intention is that additional public footway space is gained through increased building setbacks (which is likely to result in increased building heights), this should be made clear.</p>	<p>This policy supports the 11th of 12 core planning principles in paragraph 17 of the NPPF i.e. "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable". Policy KBR8 does not, in Part (A), make any suggestion that development should be 'at the expense of vehicular traffic'.</p> <p>The Forum has identified opportunities in the Neighbourhood Area to improve the pedestrian environment, and thus encourage active travel for the benefit of Knightsbridge's residents and others. By way of an example, almost half of the northern pavement in Brompton Road between Montpelier Street and Lancelot Place has at least one or two metres of extra space that could become pavement without any loss of road space. The Forum considers that it may clarify the intention of the policy to give this as an example and proposes the following addition to the end of para 2.5: <i><u>"...There are opportunities to increase pavement space without reducing road space. One such example is the raised pavement area along Brompton Road between Montpelier Street and 102 Brompton Road which could be widened without affecting traffic flows."</u></i></p>

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			<p>The classification of main roads in criterion C conflicts with the Council's identified road network hierarchy as set out in UDP Policy TRANS16 – it includes roads that are not part of the Transport for London Road Network, London Distributor Roads, or Local Distributor Roads. No justification for this local designation departing from this strategic designation has been provided; nor is it explained how a neighbourhood-based hierarchy could have practical effect when it covers an extremely small area of the City's overall highways network. This approach could undermine the Council's role as highways and traffic authority and is an area in which the Plan is clearly not consistent with strategic policies in the local plan.</p> <p>Furthermore, paragraph 2.4 inaccurately refers to several roads that are not part of the TLRN – of those mentioned only Brompton Road and the part of Knightsbridge between Brompton Road and Hyde Park Corner are. Kensington Road and Kensington Gore are Westminster City Council roads and any liaison needs to be with the council as highway authority.</p> <p>We would suggest deletion of this policy.</p>	<p>The identification of Main Roads in the KNP is done for the purpose of identifying those as distinct from primarily residential streets and applying Policy KBR8 to relevant roads within the KNP Area. It does not impact on the wider road hierarchy or the purpose of that hierarchy.</p> <p>The Forum has checked with TfL which has apologised and proposed the following amendment to para 2.4 in the supporting text (which the Forum agrees): <i>"As Brompton Road, Kensington Road, Kensington Gore and Knightsbridge <u>(east of the London Underground station)</u> form part of the Transport for London Route Network (TLRN), any proposals for pedestrian crossings or other measures on those roads will need to be discussed and agreed with Transport for London, <u>as highway authority for these roads. Knightsbridge, west of the London Underground station, Kensington Gore and Kensington Road form part of the Strategic Road Network (SRN), where WCC is the Highway Authority; however WCC and Transport for London have a</u></i></p>

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				<p><u>joint network management duty for these roads under the 2004 Traffic Management Act and, as such, any proposals for pedestrian crossings or other measures that may affect traffic flow on those roads will also need to be discussed and agreed with Transport for London.</u></p> <p>There is no need to change the policy wording itself.</p> <p>There was explicit support given to Policy KBR8 at Reg 16 stage by TfL, KRMC (57), Chelsfield (84) and private individual (25).</p>
15.	KNP62	WCC	<p>KBR9: Policy duplicates saved UDP Policy DES8 and is unnecessary. In terms of terminology, if retained it should refer to advertisement consent rather than planning permission.</p> <p>Paragraph 2.6 should make clear that any proportionate advertising on construction sites should only be in commercial streets at ground floor level, to confirm with the</p>	<p>The Forum agrees that the policy should refer to advertising consent and suggests that the words "planning permission" be replaced with "consent".</p> <p>The Forum considers that this policy is locally-specific and seeks to enhance the public realm and addresses negative impacts of advertisements that have, in the past, been experienced. It focuses on matters such as digital advertisements and the obstruction of pedestrian routes which are not specifically addressed in UDP Policy DES8 (a non-strategic policy).</p> <p>This is an important policy and the Forum asks the Examiner to have regard to the redevelopment of the Mandarin Oriental Hotel, where an impressive advertising hoarding covered the whole front of the building. This is an example which supports the approach taken in the KNP.</p> <p>Such clarification is considered to be unnecessary, given that it is included in UDP policy DES8.</p>

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			<p>Councils approach as set out in UDP policy DES8 and paragraph 10.99.</p> <p>Paragraph 2.7 does not provide justification to the policy and instead implies that the Council should introduce Article 4 Directions – setting such direction falls beyond the scope of neighbourhood plans.</p>	<p>The intention of paragraph 2.7 is to provide clear support for action – whether it be an Article 4 direction or other mechanism – to address the issue of advertising in phone boxes, which was raised by many people throughout the development of the KNP. The Forum also suggests that the wording is amended to explain that the policy will apply to advertising on phone boxes if an Article 4 Direction is issued. The Forum suggests the addition of the following sentence after “appropriate” in paragraph 2.7:</p> <p><u>“Advertising on telephone boxes has the potential to detract from the amenity of the Neighbourhood Area. If an Article 4 Direction is issued removing deemed consent, proposals for such advertising should be determined in accordance with this policy. Any such action by Westminster City Council to issue such an Article 4 Direction will be supported.”</u></p> <p>There was explicit support given to Policy KBR9 at Reg 16 stage by TfL (13) and private individual (41).</p>
16.	KNP62	WCC	<p>KBR10: Criterion C appears to have omitted consideration of any potential harm to heritage assets.</p> <p>It is also unclear how noise impacts of balcony proposals will be assessed under Criterion C(c), which makes the policy requirement difficult to implement.</p>	<p>The Forum agrees with this and proposes that the following addition is made to Policy KBR10(C), i.e. as 10(C)(d):</p> <p><i>“C. d. do not cause unacceptable harm to heritage assets or their setting.”</i></p> <p>The Forum agrees with this and proposes that Policy KBR10(C)(c) is amended as follows:</p> <p><i>“C. c. do not have a negative impact on the amenity of neighbouring residents by virtue of overlooking or nuisance noise.”</i></p>

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				There was explicit support given to Policy KBR10 at Reg 16 stage by the London Parks and Gardens Trust (21) and Chelsfield (84).
17.	KNP62	WCC	<p>KBR11: Criterion C is highly onerous.</p> <p>Under C(b), it is unclear how a plan demonstrating resistance to disease, pest and climate change could be provided.</p>	<p>This policy is intended to provide a greener environment in the Neighbourhood Area for the benefit of health, wellbeing and biodiversity. The Forum does not consider the policy is onerous and asks the Examiner to note that equivalent policies are contained within the emerging New London Plan consultation document as evidence of the importance of this type of policy at a pan-London level. This policy was supported by the GLA (99) at Reg 16 as well as a private individual (67).</p> <p>Considerable expert guidance on the selection of species and design of supporting infrastructure is available from the Tree Design Action Group (e.g. in 'Trees in hard landscapes: A guide for delivery' (2014)), the Forestry Commission's 'Right Trees for a Changing Climate Database' (http://www.righttrees4cc.org.uk) and from the Royal Horticultural Society for trees and smaller plants (https://www.rhs.org.uk/science/gardening-in-a-changing-world/climate-change/potential-new-pests). Several resources are included in the evidence base for the Plan published online at http://www.knightsbridgeforum.org/planning/examination/. The Forum considers that no change is needed to the Plan. KBR39 refers to the role of a Competent Expert which could be repeated in KBR11 if necessary.</p>

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				There was explicit support given to Policy KBR10 at Reg 16 stage by the GLA (99), London Parks and Gardens Trust (21), Matthew Bennett (of the Soho Society) (48) and KRMC (57).
18.	KNP62	WCC	KBR12: Criterion B is negatively phrased. Its wording implies a “rubber stamp” approach to the taking of planning decisions that would be challengeable if implemented.	<p>The Forum believes that the policy provides a workable framework to protect Local Green Space from development for the benefits of the community and biodiversity. The Forum asks the Examiner to note that this or very similar wording has been used in a large number of ‘made’ neighbourhood plans in respect of Local Green Space policies. Examples include neighbourhood plans for Arlesey (Central Bedfordshire), Kessingland (Waveney) and Shenstone (Lichfield).</p> <p>There was explicit support given to Policy KBR10 at Reg 16 stage by the Friends of Hyde Park and Kensington Gardens (20), London Parks and Gardens Trust (21) and the Montpelier Square Garden Association (70).</p>
19.	KNP62	WCC	KBR14: Reversion of the whole site to parkland (itself an ambiguous term – is something other than green open space intended?) as supported in Criterion B promotes less development than adopted City Plan Policy, which identifies the site as a strategic housing site, and is therefore contrary to NPPF paragraph 184. A better approach might be to state that any redevelopment of the site should include generous green open space provision functionally related to Hyde Park on the other side of South Carriage Drive.	<p>The Forum proposes the following amendment to Policy KBR14(B) to provide clarity: <i>“The retention of the barracks use on the whole or part of the site is supported, as is reversion of all or part of the site to parkland.”</i></p> <p>Para 3.22 of the Part 3 document would also need to be amended as follows:</p> <ul style="list-style-type: none"> • <i>“There were strong feelings locally about the Hyde Park Barracks land with the majority of people feeling that either the site should either remain as it is or be returned to its original Metropolitan Open Land status. Failing Given that <u>this would be in conflict with the strategic allocation for the site</u>, then it is important that <u>development is appropriate and reflects the wider</u></i>

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			<p>The final sentence of criterion D(a) appears to restrict design solutions to the site that could result in a more equitable distribution of building heights and massing. It is therefore contrary to the NPPF paragraphs 56-65 on requiring good design.</p>	<p><i>context. In particular, the height, bulk and footprint of any redevelopment should not be increased or out of keeping with the surrounding buildings...</i></p> <p>This is not the intention of the policy. Part (D)(a) recognises the importance of the building making up any new development not being out of scale with its surroundings. This is considered important due to the fact that the site lies within the Metropolitan Open Land and the Royal Parks Conservation Area and is close to a number of historic buildings of value. The Forum considers that it may be helpful if the following amendment were made to KBR14(D)(a):</p> <p><i>“a. The height, bulk and massing of any proposals should reflect respect the scale and character of the local built environment, including identified important views (including those from Hyde Park and Kensington Gardens). It should maintain and enhance neighbouring residential amenity and all other relevant material considerations. The site is not an appropriate location for new tall buildings, <u>and any redevelopment of the site</u> should not exceed the existing built footprint and should maintain existing separation distances between buildings.”</i></p>
			<p>Criterion F is unnecessary. As the site is bordered by Knightsbridge and South Carriage Drive, all vehicular access will be via these routes.</p>	<p>The intention of Part (F) is to relate to direct access to the site and wider access routes. In order to get to Knightsbridge and South Carriage Drive, it is important that such vehicles only use Main Roads. The Forum proposes that a new paragraph 3.31 is added which says:</p> <p><i>“It is important that the large vehicles servicing the <u>deconstruction, construction or operation of the completed development travel to and from the site along</u></i></p>

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			<p>Criterion G cannot be enforced through the planning system – development proposals can only provide suitable drop off collection points on site, not control driver behaviour which is a matter for the Council as highway and traffic authority.</p> <p>It is not the role of a neighbourhood plan to dictate where the City Council should prepare planning briefs as set out in paragraph 3.16. This is a judgement for the Council as local planning authority, having regard to the</p>	<p><u>Knightsbridge, South Carriage Drive and the Main Roads that serve access it rather than through much narrower Local Roads.</u></p> <p>The Forum agrees and proposes the following amendment to Policy KBR14(G): <i>“All access, and egress points, drop-off and collection points (including by taxi or minicab), servicing sites (including refuse servicing) and deliveries points must only take place within buildings should be located within the site boundary and not on street.”</i></p> <p>In the Reg 16 representations by TfL, the GLA and the Westminster Cycling Campaign, support was given for the provision of residential parking being only for Blue Badge holders. It is therefore proposed that Policy KBR14(H) is amended as follows: <u>“H. Residential development on the site is encouraged to be car-free in line with Policy KBR31, with the exception of provision for Blue Badge holders. Any residential car parking must be provided on-site and off street, within buildings within the site. Parking proposed for residential use should aim for significantly less than one space per unit. Any Electric vehicle charging provision is encouraged to exceed above London Plan requirements is encouraged.”</u></p> <p>The Forum recognises that WCC should take a lead in developing any planning brief for the site. Paragraph 3.16 does not dictate this but signposts that this is considered to be a reasonable approach for such a significant site and therefore any site promoter would be well advised to discuss this at the earliest possible stage with the planning</p>

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			<p>guidance in paragraph 153 of the National Planning Policy Framework.</p> <p>The planning system does not protect rights to 'tranquillity' as referred to in paragraphs 3.17-3.22. Furthermore, the site is in a central London location, is already partially used for residential purposes, is located next to residential uses, and has already been identified in the City Plan as a strategic housing site.</p> <p>Under paragraph 3.25, no evidence has been provided for a Knightsbridge specific need for housing for older people.</p>	<p>authority. Other stakeholders should also be consulted. It is proposed that paragraph 3.16 be amended to read: <i>"Development proposals for the site are encouraged to explore with Westminster City Council at an early stage whether should be informed by a planning brief or development opportunity framework; should be drawn up, by the City Council in close consultation with local stakeholders and residents, to covering all relevant planning issues and other material considerations."</i></p> <p>The Forum believes that the tranquillity of open spaces is an important principle and notes that planning can protect areas of tranquillity (see NPPF paras 77, bullet 2 and 123, bullet 4). The emerging New London Plan consultation document recognises the importance of tranquillity with the inclusion of reference in 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). The KNF has identified, for instance, the neighbouring MOL as an area of relative tranquillity and it is the tranquillity of this area that the policy seeks to protect; not the tranquillity of the Hyde Park Barracks site as the Council appears to suggest.</p> <p>The Forum asks the Examiner to note that Policy KBR14 makes reference to all types of residential use. Through the community engagement which informed the development of the KNP, the need for some housing suitable for the needs of older people was identified. Paragraph 3.25 simply recognises and encourages this, reflecting the evidence</p>

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			<p>Paragraph 3.28 refers to the LUC report and views identified within it – though the document has no status as a policy document. If additional views are proposed to that set out in policy KBR5, they should be included within policy and appropriately justified.</p>	<p>presented in the March 2016 Consultation Report at paragraph 4.25.</p> <p>The Reg 14 consultation KNP Policy relating to the Hyde Park Barracks (KBR16) made reference to the LUC report. Representations made by WCC to the Reg 14 consultation stated that if the intention was to impose a policy requirement, 'this should as a matter of good practice be clear from the KNP itself and not require referring to a separate document.' The Reg 16 KNP therefore kept references to 'identifies/d views' in the justification or policy of KBR13 and KBR14 respectively. The Forum would be happy to include further reference to views in KBR14 (or KBR13) if the Examiner considers it appropriate. This would perhaps be most appropriate as an amendment to KBR14(D)(a) via a footnote stating that,</p> <p><u>"Relevant important views identified in the LUC report are:</u></p> <ul style="list-style-type: none"> <u>i. West Carriage Drive;</u> <u>ii. Serpentine Bridge;</u> <u>iii. Kensington Road at junction with Ennismore Garden;</u> <u>iv. Prince of Wales Gate, South Carriage Drive;</u> <u>v. Trevor Square;</u> <u>vi. South Carriage Drive, near Park Close;</u> <u>vii. The Serpentine Lake, east;</u> <u>viii. View across the Serpentine Lake from the northern bank;</u> <u>ix. View north along Montpelier Street."</u> <p>There was explicit support given to Policy KBR14 at Reg 16 stage by KRCM (57), the Friends of Hyde Park and Kensington Gardens (20), the Royal Parks (56), the Royal</p>

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				Commission for the Exhibition of 1851 (44), the London Parks and Gardens Trust, the Knightsbridge Association (80) and private individuals (5, 23, 24, 25, 34, 37, 41, 43, 60, 67, 69 and 78).
20.	KNP62	WCC	<p>KBR15: The policy as presented relates to mitigation of the effects of all uses other than residential ones. Given that the Stress Areas in the Westminster City Plan operate rather differently we would suggest that it would avoid confusion if a term other than "Neighbourhood Stress Area" were to be used.</p> <p>Criterion C relates to licensing rather than planning considerations and is therefore not appropriate for a neighbourhood plan.</p>	<p>The Forum still considers that the term is appropriate and distinguishes it sufficiently from the not wholly dissimilar concept of Local Stress Areas in the City Plan. Indeed, every neighbourhood is likely to have its own version of such areas. WCC has not proposed alternative wording.</p> <p>Part C makes no mention of licencing. It is intended to ensure that a safe environment where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion as required by para 58 of the NPPF. It is also important to note that the New London Plan consultation draft recognises the need for a more integrated approach to planning and licensing; as does the House of Lords Select Committee on the Licensing Act 2003. However, to improve the policy it is suggested that Policy KBR15(C) is amended as follows:</p> <p><i>"... new entertainment uses should demonstrate how they have been designed to will mitigate and reduce to a minimum the potential for anti-social behaviour. Development proposals that are likely to result in the clustering of groups of people outside or near the premises must demonstrate that they have been designed to will ensure that these groups are managed and dispersed efficiently, effectively and promptly."</i></p>

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			<p>Criterion D should clarify that 'Local Roads' are identified on the proposals map to enable the policy to be implemented. Alternatively, omission of the term might be considered, as it does not appear to add greatly to the effectiveness of the policy.</p>	<p>The Forum agrees that reference should be made to Local Roads being shown on the Policies Map. The following amendment is therefore proposed to Policy KBR15(D): <i>"D. Outside the Core Central Activities Zone, the intensification of retail (Class A) or entertainment uses in Local Roads (as shown on the Policies Map) in the Neighbourhood Stress Area is discouraged..."</i></p> <p>The Forum would not wish to take out reference to the term 'Local Roads', otherwise there could be conflict with WCC strategic policy in respect of activity along main frontages. Indeed, the term 'Local Roads' is the simplest way for the KNF to identify a large number of primarily residential roads. Removing references to 'Local Roads' could add unnecessary complexity to this policy and others.</p> <p>There was explicit support given to Policy KBR15 at Reg 16 stage by the Knightsbridge Association (80), KRMC (57) and Matthew Bennett (of the Soho Society 48) as well as private individuals (12, 22, 23, 24, 25, 34, 36, 37, 41, 43, 60, 67, 69 and 78).</p>
21.	KNP62	WCC	<p>KBR16: Paragraphs B and C of this policy would be likely to be more effective if it identified places where night-time uses were acceptable and set out additional criteria for proposals elsewhere.</p> <p>Otherwise, criterion C should clarify that 'Local Roads' are identified on the proposals map to enable the policy to be implemented.</p>	<p>The Forum considers that it would not be appropriate to identify specific locations (which may change over time) at this stage. Such a change to the policy could be considered to be significant and the Forum does not consider it would add to the policy.</p> <p>The Forum agrees that reference should be made to Local Roads being shown on the Policies Map. The following amendment is therefore proposed to Policy KBR16(B): <i>"B. Proposals for new (including a change of use to) cafés and restaurants (Class A3), public houses, bars and other</i></p>

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			<p>Furthermore, many 'renewal' proposals may not need planning permission, and as worded the policy does not allow for any assessment of the degree of harm of individual proposals.</p>	<p><i>drinking establishments (Class A4) and hot-food takeaways (Class A5) in Local Roads <u>as shown on the Policies Map</u> will only be supported..."</i></p> <p>This point is noted. If a proposal does not need planning permission then the policy doesn't apply. As to the degree of harm, the Forum considers that the policy would be improved by making the following amendment to Policy KBR16(C):</p> <p><i>"C. On Local Roads renewal or change of use proposals for retail and commercial activity (Classes A1, A2, B1c, B2 and B8) or the intensification of existing such uses will only be supported if: <u>they will have no adverse impact on residential amenity; and there is a condition attached...</u>"</i></p> <p>There was explicit support given to Policy KBR16 at Reg 16 stage by the GLA (99) and KRMC (57).</p>
22.	KNP62	WCC	<p>KBR17: Under criterion A, it is unclear how 'state of the art' can effectively be determined. As such it does not provide helpful guidance for either developers or the local planning authority.</p> <p>Criterion B relates to procedural matters rather than criteria for determining a planning application and should not therefore form part of policy. Furthermore, there may be circumstances where Secured by Design principles may not be appropriate due to other competing factors, yet proposed wording does not recognise this. We would in any event suggest omission of references to</p>	<p>The Forum notes this point and proposes that the following definition is added to the Glossary in Appendix A:</p> <p><u>"State of the art - relating to something that is at the most recent stage in development and uses the latest techniques."</u></p> <p>The Forum disagrees and wishes to note that Part (B) uses the words 'where appropriate' and 'where possible' in order to provide the necessary flexibility to both apply good practice appropriately and to be able to respond to changes in good practice over time.</p>

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			particular standards, which may become dated quite quickly.	
23.	KNP62	WCC	KBR18: It is unclear how it will be judged if proposals 'will enhance the ISC's international reputation' as required under criterion A. Furthermore, paragraph 4.13 hints that this relates to the quality of the occupier, which is not a planning consideration (the planning system can only deal with uses of land of course).	<p>The whole purpose of having an International Shopping Centre (ISC) designation is so that it can distinguish a particular shopping destination from other centres in terms of the quality of the offer (using 'international' as the differentiating factor). It also has a role in attracting international retailers to the Area; in this regard it is a policy that is positively supporting growth. As is noted in paragraph 4.13 of the KNP, only 20% of the retail units were considered to be of international quality. The test applied in the assessment was whether these retailers could commonly be found in shopping centres elsewhere. This is considered to be a straightforward judgement that can be applied. Moreover, the policy provides 'support' for applications that would be bringing retailers with an international reputation to the ISC; it does not make this a fundamental requirement of whether an application should be granted or refused.</p> <p>The policy should be amended to support proposals that demonstrate that they have been designed to encourage occupancy by international retailers. The proposed amendment to Policy KBR(A) is:</p> <p><i>"A. ...Development proposals <u>within the ISC in the Neighbourhood Area (as shown on the Policies Map)</u> that will enhance the ISC's international reputation and standing are strongly encouraged. <u>This might be demonstrated by the design or provision of facilities to meet the needs of internationally recognised retailers selling fashion or luxury brands.</u> Developments which secure the use of existing..."</i></p>

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			Criterion A conflicts with Policy KBR18A.	<p>It is believed that the representation means there may be a conflict with Policy KBR19(A) and specifically the reference to change of use of Class A4 uses (pubs). If this is the case then the point is accepted and it is proposed that Policy KBR18(A) is amended as follows:</p> <p><i>"A. ... Developments which secure the use of existing Class A3- <u>or</u> A5 premises for A1 use in this area are also strongly encouraged."</i></p> <p>There was explicit support given to Policy KBR18 at Reg 16 stage by the Knightsbridge Business Group (68). Given the fact that the ISC extends into the Royal Borough of Kensington and Chelsea, it is instructive to note that RBKC (90) did not object to the policy.</p>
24.	KNP62	WCC	<p>KBR21: To ensure effective implementation, policy would benefit from some supporting text that sets out how the existing viability of office use (as referred to in criteria B), would be judged.</p> <p>Criterion D misstates the purpose of directions under article 4 of the General Permitted Development Order. It would be better if this paragraph simply expressed support for the making of a direction by the</p>	<p>The Forum notes this and proposes the following new paragraph after paragraph 4.21:</p> <p><i><u>"4.22 Any development that would result in the loss of an existing office use must demonstrate that it is no longer viable for office use. This could be demonstrated by evidence of an active marketing campaign over a reasonable time period, typically 12 months, at a reasonable market value for similar properties nearby."</u></i></p> <p>The Forum agrees and proposes the following amendment to KBR21(D):</p> <p><i><u>"D. In order to assist the retention if required to restrict the change of use of B1 office space to residential use in the Knightsbridge Neighbourhood Area, the use of Article 4 directions by Westminster City Council are strongly encouraged supported."</u></i></p>

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			City Council along the lines of the first sentence in paragraph 4.22.	There was explicit support given to Policy KBR21 at Reg 16 stage by the GLA (99) and the Knightsbridge Business Group (68).
25.	KNP62	WCC	KBR22: Criterion C appears to relate to matters such as businesses management practices, such as their on-site freezer space, or amount of stock that is ordered, which are not planning considerations.	<p>The purpose of Part (C) is to require applicants to think about the importance of effective waste minimisation and management, which has the benefits of reducing the adverse impacts that inefficient waste management causes (e.g. noise and congestion). This might include, for example, specific provision of infrastructure designed to ensure effective waste collection and storage. The following minor amendment to Policy KBR22(C) should be made to clarify this:</p> <p><i>"C. Development proposals for cafés, eateries and restaurants should demonstrate that they will have been designed to ensure they have sufficient facilities on-site..."</i></p> <p>There was explicit support given to Policy KBR22 at Reg 16 stage by Matthew Bennett (of the Soho Society) (48), the Knightsbridge Business Group (68) and private individual (67).</p>
26.	KNP62	WCC	KBR23: Criterion B makes onerous requirements on small developments that may result in limited construction movements; e.g. proposals for a single dwelling, basement or refurbishment of existing buildings. Requiring such proposals to provide a construction management plan or make planning obligations could undermine the viability of small scale development contrary to national policy requirements that policies should not be so burdensome that they do so.	<p>Sustainable development, no matter the size, should be alive to the impacts that it can cause during construction and seek to minimise these. The Forum has provided detailed justification with the policy that explains why the measures are necessary and supportive of growth.</p> <p>Part B is not onerous and is wholly appropriate for a single dwelling, basement or substantial refurbishment of existing buildings given the impact that such works can have on the local area. Such small developments cost in excess of £500,000 and the incremental cost of preparing and implementing a Construction Management Plan (CMP) is</p>

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			<p>Criteria C appears to require onerous processes on developers and the Council, through signposting to Appendices C and F. The contents of these go beyond the remit of a neighbourhood plan and have resource implications for the City Council. Construction issues are not unique to Knightsbridge and the City Council already has established policies and procedures to deal with Codes of Construction Practice and its enforcement. Many of the matters dealt with are controlled through other enforcement regimes and there are limits to the extent to which the planning system can deal with such matters. In any event, by confusing responsibilities and enforcement procedures</p>	<p>negligible in comparison. It is also important to bear in mind that these measures are necessary to mitigate pressures from construction activity on existing businesses and residents on an ongoing basis.</p> <p>In any event, the policy offers considerable flexibility to address the matters identified e.g. planning conditions, a CMP or similar document or a separate planning document. To emphasise this flexibility, the Forum suggests replacing the semi-colons with commas so it reads as follows: <i>“B. Proposals for developments of Level 4 or larger must address the following matters through planning conditions, a Construction Management Plan (CMP) or similar document approved by WCC or a separate planning obligation e.g. s106 agreement:...”</i></p> <p>Appendix C provides positive ways in which particular impacts associated with construction in the neighbourhood area may be addressed and can be applied on a case-by-case basis. The policy does not require compliance with Appendix C but rather identifies suitable measures that could be proposed or modified by developers, contractors, planners, amenity societies or others to meet the requirements of KBR23.</p> <p>The matters addressed by Part C and/or Appendix C should not be onerous for the applicant or Westminster City Council. On the contrary, if the proposed practices and procedures are followed, it should not require enforcement action and would assist in reducing conflict. It is also in accordance with the NPPF (paragraph 1).</p>

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			<p>this policy may make addressing the underlying issues less rather than more effective. The City Council is clear that it does not have the resources to enforce the standards suggested in this policy, which may therefore be undeliverable.</p> <p>If the Neighbourhood Forum wishes to promote particular standards by providing best practice for contractors, it should do so in a separate document.</p>	<p>There was explicit support given to Policy KBR23 at Reg 16 stage by the Institution of Civil Engineers (97), MSP Strategies (10), Caroline Russell (London Assembly member) (95), KRMC (57), the Knightsbridge Business Group (68) and the Knightsbridge Association (80).</p>
27.	KNP62	WCC	<p>KBR24: Criterion A duplicates (and potentially weakens) City Plan Policy S15 and is unnecessary. Community feedback of perceived need, as referred to in paragraph 5.2, should not override the robust evidence based approach to assessing need through the SHMA.</p> <p>It is not possible to restrict occupation of private market housing by place of work as suggested in criteria B. Paragraphs 5.2-5.4 meanwhile, indicate the policy is intended to relate to affordable housing. As the NPPF makes clear, eligibility for affordable housing</p>	<p>The Forum considers that the integration of development into the existing community is an important aspect of social sustainability. Whilst it is recognised that certain parts of Part (A) reflect strategic policy, it is not considered that it weakens Policy S15. The requirement to contribute 'to the maintenance and enhancement of a vibrant local community' is encouraged, rather than required. The policy provides clear guidance to applicants to think about how their development can, for instance, strengthen community cohesion.</p> <p>Part (B) does not require any form of occupancy restriction to be placed upon development. Rather, it is intending to encourage the type of housing to be delivered which will give a greater chance of local workers living locally. This is in response to many of the institutions and businesses identifying that the rising cost of living, including travel, was making it more difficult to recruit staff across a range of roles, particularly lower paid roles.</p>

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			has to be set by the City Council on the basis of local incomes and local house prices, and its allocation is managed in line with housing legislation. It is therefore not possible to confine the delivery of affordable housing to employees (or indeed that affordable housing provided in one part of a borough will be occupied by those living or working in that area).	There was explicit support given to Policy KBR24 at Reg 16 stage by the GLA (99), the Knightsbridge Association (80) and the Exhibition Road Cultural Group (73).
28.	KNP62	WCC	KBR25: Paragraph 5.6 should make clear that lateral conversions can cause harm to the special interest of listed buildings, and would therefore not normally be acceptable (as set out in the supporting text to UDP policy DES10).	<p>The Forum disagrees. This was not a specific point that was raised during engagement on the preparation of the KNP so it is not considered appropriate to add it at this stage.</p> <p>Reg 16 representations by Thames Water have identified that such conversions could result in an increase in the foul flows to the sewerage network, which is an identified problem in Knightsbridge. It is therefore proposed that a new paragraph 5.7 is added as follows:</p> <p><u>“Thames Water has advised that the reconfiguration of existing residential buildings can result in an increase in the foul flows to the sewerage network. Thames Water advises that such proposals should be accompanied by the retrofitting of sustainable drainage measures to the property in order to ensure that there is a net reduction in peak flows to the sewerage network. Developers are advised to contact Thames Water at an early stage to discuss water and sewerage infrastructure requirements.”</u></p>
29.	KNP62	WCC	KBR27: Criterion A relates to neighbourhood management issues rather than the consideration of planning applications and is therefore beyond the scope of a neighbourhood plan.	The Forum considers Part (A) to be important. Throughout the development of the KNP, representations have been made by a number of residents and resident groups living in or near to the Strategic Cultural Area (SCA) as to the importance of recognising the residential aspect to the SCA.

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			<p>Furthermore, the nature of temporary and pop up events, as referred to in criteria B, cannot be controlled through the planning process.</p>	<p>Part (A) is one aspect of ensuring that appropriate balance is recognised. One purpose of KBR27(A) is to support the development of the Re-Imagining Albertopolis scheme. To improve it, the following amendment should be made to Policy KBR27(A): <i>"A. Key cultural, education and research partners are encouraged will continue to work together alongside local residents to progress associated development and public realm improvements to the Royal Albert Hall area and, in particular, its physical connection with the Albert Memorial – referred to as the Re-Imagining Albertopolis initiative."</i></p> <p>Part (B) makes clear that this only applies where planning permission is required.</p> <p>There was explicit support given to Policy KBR27 at Reg 16 stage by the Friends of Hyde Park and Kensington Gardens (20), the Royal Parks (56), the Exhibition Road Cultural Group (73), the Royal Albert Hall (92), the Science Museum (59), the Natural History Museum (87) and local resident and Director of the Museum of Architecture (71).</p>
30.	KNP62	WCC	<p>KBR28: Criterion D is negatively phrased, and overly onerous as it fails to recognise that some proposals may have overriding benefits, or that different modes of active travel may sometimes compete – e.g. cycle parking vs space for pedestrians. Local facilities that support active travel are also not defined so the policy cannot be effectively implemented. This paragraph is repetitive of the other parts of the policy. Given this and the other points</p>	<p>The Forum considers that promoting active travel, and the associated environmental and health benefits for the people who live, work, visit and travel through the neighbourhood area are important. Therefore whilst Part (D) is negatively phrased, the Forum considers that these impacts serious enough to justify being resisted. To improve the policy, the following amendments to criterion (D) are proposed: <i>"D. Development will be resisted where it would:</i> <i>a. reduces the capacity result in a net reduction of existing active travel infrastructure;</i></p>

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			we have made, we would suggest its omission.	<p><i>b. makes existing active travel infrastructure less safe <u>without the provision of adequate mitigation measures</u>; or c. reduces the capacity, quality or accessibility of local facilities which support active travel <u>without the provision of adequate mitigation measures.</u></i></p> <p>The Mayor of London, Sadiq Khan, published a draft of the Mayor's Transport Strategy on 21 June 2017 which sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years. Three key themes are at the heart of the strategy: healthy streets and healthy people; a good public transport experience; and new homes and jobs. Therefore, KBR28 is very relevant to the Mayor of London's policies to increase walking and cycling.</p> <p>There was explicit support given to Policy KBR28 at Reg 16 stage by the GLA (99), TfL (13) and the Institution of Civil Engineers (97).</p>
31.	KNP62	WCC	KBR29: Criteria A – C duplicate existing London Plan, City Plan, and UDP policy.	<p>The Forum considers that the wording of KBR29 supports the overall ambition of the KNP to encourage the transition away from personal motor vehicles to achieve the associated environmental and health benefits and to reduce congestion. Criterion A to C address local issues in specific places. Further, by distinguishing between Local Roads and Main Roads (e.g. Red Routes and the Strategic Roads Network), the KNP is able to distinguish simply between streets that are primarily residential and those that are busy with many mixed uses. The Forum considers that they should all be retained in their current form, with the exception of Imperial College Road.</p>

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			<p>Criterion E raises matters of ownership and management that are beyond the scope of a neighbourhood plan.</p> <p>Under criterion G, pedestrian traffic signals are a highway management rather than land use planning matter.</p> <p>Criteria H refers to highways management rather than land use planning matters.</p>	<p>The Forum considers that the policy identifies specific issues that are of importance in Knightsbridge, for example, pedestrian movement. Moreover, the policy was explicitly supported at Reg 16 stage by TfL.</p> <p>Whilst it may not be a common occurrence, re-routing of formal access routes does occur and leads to reduced opportunities for safe pedestrian movement. An example of this locally was the development at 100 Knightsbridge (aka One Hyde Park) which resulted in the re-routing of Edinburgh Gate to the west whereas previously it ran through the middle of the site. WCC used similar processes to when it granted planning consent for the BBC in Portland Place. Part E is a practical and necessary solution for some developments.</p> <p>The Forum proposes the following amendment to KBR29(G): <i>"G. Development which provides appropriate additional pedestrian infrastructure, such as pedestrian countdown traffic signals or enhances existing pedestrian infrastructure..."</i></p> <p>The Forum agrees that Part (H) can be deleted. It suggests that, in order to retain the point, the following text is added to the end of paragraph 7.8: <i>"7.8 ...other requirements of the Plan. Whilst not a planning matter, this could include new provision or safety enhancements to existing Advanced Stop Lines for cyclists¹."</i> ¹ <i>Some signal-controlled junctions have Advanced Stop Lines (ASLs). ASLs help motorists and cyclists by providing an area for cyclists to wait in front of traffic when the lights</i></p>

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			We would suggest omission of E-H. A-C could be integrated with policy KBR 28 to provide a single, comprehensive policy dealing with active travel.	<p><u>are red. Cyclists in this area are more easily visible to motorists and have space to move off when the lights turn green.</u></p> <p>KBR29 addresses the needs of 'places' whereas KBR28 focuses more on 'activities'. Parts (E)-(G) are matters of considerable local importance. The Forum also disagrees with the integration of parts (A)-(C) into other policies. Through the development of the KNP, the travel and movement policies have already been condensed from five policies down to two policies and what is presented is considered to represent an appropriate balance.</p>
32.	KNP62	WCC	KBR30: Policy relates to the procedure and contents of transport assessments rather than criteria for the determination of a planning application. It is for the local planning authority to set out what material should be submitted with a planning application, in accordance with relevant legislation. It therefore goes beyond the scope of a neighbourhood plan, as set out in paragraph 183 of the NPPF to set planning policies to determine planning applications. We would suggest omission of this policy.	<p>Knightsbridge is already a congested neighbourhood and that brings with it environmental, health and economic disbenefits. The policy seeks to encourage development to consider how to avoid exacerbating those impacts and signposts matters of importance specific to Knightsbridge which could arise from developments that are <i>likely</i> to have significant impacts, i.e. applications that require a Transport Assessment. Paragraphs 32, 34 and 36 of the NPPF support inclusion of KBR30.</p> <p>There was explicit support given to Policy KBR30 at Reg 16 stage by the London Taxi Drivers Association (82).</p>
33.	KNP62	WCC	KBR31: Criteria A is contrary to UDP policies TRANS22 and TRANS23 and could result in additional on-street parking stress. The term 'motor-vehicle free' should be defined as currently it is not clear if this refers to car parking, or also servicing requirements.	<p>The Forum emphasises that the supporting text to London Plan Policy 6.13 supports the approach taken by KBR31 (A). The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing unnecessary car parking provision that can undermine cycling, walking and public transport use. The draft New London Plan suggests that 'is encouraged to'</p>

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			<p>Criterion B should not relate to ‘all development’ – doing so is overly onerous for minor extensions and change of use applications. It also raises issues relating to the operation of buildings after construction, where the planning system will have very limited efficacy.</p>	<p>might be amended to ‘should’. The Forum considers that ‘encouraged to’ is in general conformity with adopted London Plan and is not dissimilar with the current direction of travel of emerging New London Plan.</p> <p>The Forum notes that UDP Policies TRANS22 and TRANS23 are not strategic policies therefore the KNP is not required to be in general conformity with them.</p> <p>The Forum agrees it would be helpful to define ‘motor-vehicle free’ and proposes the following definition to be included in the Glossary (Appendix A): <u>“Motor vehicle-free – development that does not provide any off-street car parking or increase on-street parking stress, other than to address the needs of Blue Badge holders.”</u></p> <p>The Forum comments that Part (B) requires that development is ‘encouraged to maximise its potential’. This is not an onerous requirement and it is important that all development, where possible, contributes towards these aims and the environmental and social sustainability benefits they will bring. A slight amendment is suggested to Policy KBR31(B) in order to clarify that the policy relates to the design of development facilitating this objective: <u>“B. All development is encouraged to <i>be designed to</i> maximise its potential for construction, delivery, freight, waste and recycling consolidation plans including zero emission ‘last mile’ services.”</u></p>

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				There was explicit support given to Policy KBR31 at Reg 16 stage from TfL (13), DriveNow UK Ltd (55), the GLA (99) and Bluepoint (63).
34.	KNP62	WCC	<p>KBR32: Current policy wording appears to exclude vehicles running on other sustainable fuels (e.g. hydrogen) that could realise similar environmental benefits. We would suggest that a more generally worded policy supporting sustainable vehicle options would be better than one along these lines which could become outdated very quickly as a result of technological change.</p> <p>Criterion B should seek to ensure that where charging points are promoted, design and siting is considered against pedestrians and other highways users to conform with NPPF and development plan requirements to</p>	<p>This policy is about encouraging the development of infrastructure which the Forum knows can improve the local environment and which can be achieved throughout the lifetime of the KNP. The policy addresses the specific needs of vehicles already active on local streets and most expected by the Committee on Climate Change and many other experts to feature in the area over the life of the KNP.</p> <p>To add some flexibility, the Forum suggests inserting the following wording into KBR32(A): <i>“A. In order to reduce the environmental impact of vehicular pollution, Level 1 to 3 development) (as described in Appendix G) should facilitate improvements to existing motor vehicle infrastructure so that it can be used by electric vehicles that do not emit harmful exhaust emissions such as electric vehicles...”</i></p> <p>Electric vehicles can be supported by modest changes to existing utility infrastructure. By contrast, hydrogen fuel (and other known sustainable fuels) would require completely new infrastructure for vehicles that are not currently viable and may result in impacts on the neighbourhood which are significant.</p> <p>The KNP already requires development to ensure that it does not block pedestrian routes (i.e. KBR8).</p>

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			<p>support an increased uptake in walking and cycling.</p> <p>Reference in paragraph 7.17 to use of parking spaces by private hire vehicles is not a matter for planning applications, and does not relate to policy KB32.</p> <p>As worded criterion E could have negative impacts on character and heritage through unsightly provision across the neighbourhood area.</p>	<p>The Forum notes this point and proposes the following amendment to paragraph 7.17: <i>"7.17 A separate issue relating to parking spaces that should be addressed immediately is the use of resident parking spaces on Local Roads by waiting private hire vehicles i.e. minicabs. Measures that encourage drivers of these vehicles to use charging points in publicly accessible parking bays could mitigate such pressures. These quiet residential areas of Knightsbridge should not be used as a 'staging area' for private hire vehicles waiting for their next job. Often these vehicles wait with their engines idling which creates additional pollution."</i></p> <p>The Forum disagrees. The KNP already has policies that address matters relating to the character and heritage of new development. Moreover, these types of facilities will typically be within buildings.</p> <p>There was explicit support given to Policy KBR32 at Reg 16 stage by Cundall (88), KRMC (57), Bluepoint (63), MSP Strategies (10), Clean Air in London (52), the Institution of Civil Engineers (97), DriveNow UK Ltd (55) and the London Taxi Drivers Association (82).</p>
35.	KNP62	WCC	KBR33: The capacity and efficiency of mass transit systems is a matter of public transport service planning and therefore beyond the scope of a neighbourhood plan.	The Forum considers that in certain appropriate circumstances, development can contribute to the improvement of public transport generally which support the KNP's intention to reduce traffic in the area. The planning conditions attached to the development at 100 Knightsbridge (aka One Hyde Park) required substantial

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				<p>improvements to the exit from Knightsbridge Underground Station into Hyde Park. The development also contributed to the use of the SCOOT traffic management system. Paragraph 31 of the NPPF supports KBR33 as written.</p> <p>However, the following small change should be made to KBR33: <i>"Proposals which contribute to improving the capacity and efficiency of mass transit public transport systems serving the Knightsbridge Neighbourhood Area, as well as access to them, are encouraged. In particular..."</i></p> <p>Explicit support was given to Policy KBR33 at Reg 16 stage by the Licensed Taxi Drivers Association (82).</p>
36.	KNP62	WCC	<p>KBR34: The policy could usefully encourage developers to integrate utility requirements into the design of the schemes from the outset – something the City Plan is also likely to do. Experience shows that where this is not done utilities are often retrofitted requiring street works and road closures.</p> <p>Supporting text could usefully explain that whilst planning for future demand of utility services is an ongoing issue in Westminster and throughout central London, it falls outside the Council's jurisdiction.</p>	<p>The Forum agrees and proposes the following amendment to KBR34(C): <i>"C. Utility infrastructure and connections that are designed into and integrated with development from the outset are encouraged..."</i></p> <p>The Forum does not consider that this change is appropriate. Utilities planning is an important part of the planning system and can be within WCC's jurisdiction. For example, WCC is responsible for a pipe subway system in parts of the City of Westminster that was installed by the Victorians and used by utilities to reduce excavations and disruptions. Other parts of London encourage the use of pipe-subways e.g. the City of London.</p>

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				<p>However, the following small addition should be made to KBR34(C):</p> <p><i>“C. Utility infrastructure and connections that are designed into and integrated with development <u>from the outset</u> are encouraged <u>so that the infrastructure can accommodate additional utilities without the need to excavate in the highway adjacent to the development...</u>”.</i></p> <p>There was explicit support given to Policy KBR34 at Reg 16 stage by MSP Strategies (10) and Clean Air in London (52).</p>
37.	KNP62	WCC	<p>KBR35: It is not appropriate for the neighbourhood plan to seek to apply air quality standards that are considerably more onerous than approved national ones. This is a very significant step and to bring it forward there should be a proportionate evidence base showing the approach is likely to be deliverable and effective. By its nature, this is an issue that a neighbourhood cannot deal with on its own. This is an area where the City Council and the Mayor are both bringing forward new policy approaches; as these deal with London and Westminster as a whole they are likely to be more effective. We would suggest this policy is consolidated and simplified and that the neighbourhood forum is encouraged to revisit the matter in the light of new local and regional policies.</p>	<p>Air quality in the locality is a significant problem; worse than in many parts of London/Westminster. This is a problem not only for local residents and workers but for the large number of people that visit the area. It is therefore appropriate to adopt a robust approach to respond to the specific challenge in the locality.</p> <p>The health and social costs of poor air quality are widely reported and the monetary impact has been estimated in the billions of pounds for London alone. Given the nature of this area, the cost of poor air quality is very high.</p> <p>The Forum is therefore keen to support the wider efforts of the Mayor of London to reduce unlawful air pollution, and to achieve the environmental, health and economic benefits of doing so consistent with the UK's international obligations, through the policies in the KNP. The Forum notes that the Mayor of London's latest draft air quality policy in the London Plan broadly reflects the approach taken in the KNP. The policy therefore supports the emerging strategic policies in the development plan. As the Mayor is pursuing a similar approach to apply across London, this indicates that the</p>

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			<p>Criterion C seeks to impose additional procedural requirements on developers than the Councils own validation requirements, which goes beyond the remit of a neighbourhood plan. No evidence has been provided of the impact these additional</p>	<p>policy is proportionate and deliverable for Knightsbridge where development is particularly viable.</p> <p>Sustainable development cannot include development that does not accord with legal requirements; the law takes precedence over policy. The law states that sustainable development is a relevant factor once limit values have been achieved, not where they haven't (see Articles 12 and 18 of Directive 2008/50/EC). Further, the Court has confirmed that the Directive limits the discretion of the Member State to take into account and balance the full range of economic, social and political considerations in approaching its duty to ensure that air quality limits are complied with as soon as possible (see <i>R (ClientEarth No. 2) v SSEFRA</i> [2016] EWHC 2740 (Admin) at paras 48-49). Until legal limits are achieved, development which worsens air pollution in an area which does not comply with the legal requirements cannot be sustainable development. The policy, as drafted, simply reflects legal requirements in relation to air quality which also require the UK to continue to reduce air pollution as there is no "safe" limit of air pollution.</p> <p>Please refer to the GLA's (99) supportive comments on this policy. Also comments by Clean Air in London (52).</p> <p>See comments above. Part C applies to development or substantial refurbishment of Level 3 or larger (as described in Appendix G) i.e. not small scale developments. Following consideration of the GLA's comments, the Forum is of the opinion that the following amendments to Policy KBR35(C) would improve the policy:</p>

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			<p>requirements may have on the viability of small scale developments.</p> <p>Interpretation of sustainable development in criterion D is contrary to the definition given in paragraphs 7-8 of the NPPF that it is not just about environmental, but also social and economic goals. It also appears to go further than the explanation given in paragraph 10.8 of the plan that worsening of air quality may be justified in exceptional circumstances where they can be justified by the principal of sustainable development. There is no evidence that this standard can be practically met by new development (particularly given the age and nature of the building stock in the neighbourhood and relevant heritage designations). Given this we would suggest its omission.</p>	<p><i>“C. All development should be less polluting than existing development that it will replace. All development and substantial refurbishment of Level 3 or larger (as described in Appendix G) must carry out an air emissions screening to determine whether a detailed air quality assessment will be required. Until air quality in the Knightsbridge Neighbourhood Area complies with <u>the legal limit values for pollutants to the air as defined in Directive 2008/50/EC on ambient air quality and cleaner air for Europe</u>, a detailed air quality assessment should be carried out of for any development which is likely to increase concentrations of regulated pollutants in the air to determine appropriate mitigation measures <u>to ensure air pollution is not increased.</u>”</i></p> <p>See comments above. Following consideration of the GLA's comments, the Forum is of the opinion that the following amendments to Policy KBR35(D) would improve the policy: <i>“D. Given the severity of local air quality conditions, <u>until legal limits for air pollution are met</u>, sustainable development can be achieved only by support for development that will operate without adding to <u>current levels of emissions and be constructed or demolished according to a plan which minimises air pollution.</u>”</i></p> <p>See comments above especially relating to the draft new London Plan. With regards to the specific point in relation to Part E (and the policy more generally), the KNF policy already addresses the 'before-limit value' compliance scenario and the 'post-limit value' compliance scenario. As the Mayor's proposed new air quality policy and the opinion</p>

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			<p>Criteria E and F go beyond London Plan Policy 7.14B(d) requirements that development proposals be at least 'air quality neutral', and City Plan Policy S31 requirements that developments minimise air pollution. No evidence has been provided that the viability implications of the proposed more stringent requirements have been tested, whilst in some cases refurbishment may not require planning permission. Furthermore, within point E, there appears to be some contradiction between sub-criterion a and c. Criteria a states that development <u>must be</u> air quality positive, yet sub-criterion c states developments must <u>try</u> not to cause or contribute to worsening air quality. For the reasons given above we would suggest sub-criterion c takes the appropriate approach.</p>	<p>of Robert McCracken QC and the recent ClientEarth case show, the following is required:</p> <ul style="list-style-type: none"> • The general approach is that development should be air quality positive. • In areas where the limit values are not met, this is a hard-edged requirement so as to contribute to achieving compliance with limit values as soon as possible. • In areas where the limit values are met, this is a softer requirement so that development should be air quality positive where possible but significant increases in air pollution could be permitted where there are exceptional circumstances (so long as there is no new exceedance). <p>The following amendments are proposed by the Forum to Policy KBR35(E) to improve the policy:</p> <p><i>"E. Development and substantial refurbishment of Level 3 and larger must be designed to minimise harmful emissions to air. In particular:</i></p> <p><i>a. such development must demonstrate that it is should be 'air quality positive' (i.e. better than existing or the existing benchmark) and must demonstrate how it has been designed to contribute to the reduction of concentrations of regulated air pollutants below WHO guidelines in the Knightsbridge Neighbourhood Area by 2020 and thereafter. All development should be less polluting than existing development that it will replace.</i></p> <p><i>b. development in the locality which would worsen an existing breach of a limit value or cause a new breach of limit values is inconsistent with the law and with cannot be sustainable development.</i></p>

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			<p>Criterion G – air intake points have not been defined, making the policy requirements unclear.</p> <p>Criterion H introduces a disproportionate demand for evidence (i.e. air quality assessments) for minor proposals for outdoor</p>	<p><i>c. where limit values are not exceeded in the locality, developments must try to maintain lawful levels and not cause or contribute to worsening air quality. <u>In such circumstances, a significant increase in air pollution will only be justified in exceptional circumstances.</u></i></p> <p>In relation to Part F, the GLA has requested only that clarification be given about what is expected of developers. The Forum proposes the following small amendment to the 3rd sentence in paragraph 10.7, both to address this and to amend some factual errors and recent updates: <i>“Appropriate standards for the selection of energy efficient air filters <u>to demonstrate compliance with design standards in Policy KBR35(F)</u> include BS <u>EN 16798-3:2017 (for minimum air filtration efficiency)</u>, BS <u>CEN ISO 16890-1:2016 (for particulate matter} including PM1)</u> and BS <u>CEN ISO 10121-2:2013 (for gases)...</u>”</i></p> <p>The following amendments are proposed by the Forum to Policy KBR35(G) to improve the policy: <i>“G. Air intake points <u>servicing internal air-handling systems (including air filtration systems and heating and cooling systems)</u> should be located away from existing and potential pollution sources e.g. busy roads and combustion flues. All flues should terminate above the roof height of the tallest part of the development in order to ensure the maximum dispersal of pollutants.”</i></p> <p>Part H is a proportionate response to protect public health and does not impose onerous requirements. Applications simply have to review the latest publicly available data or forecasts for nitrogen dioxide (NO₂) in the location. The</p>

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			seating that respond to people's preference sit outside.	<p>Forum's Knightsbridge Evidence Base (Part Three) identifies Brompton Road as the place most likely to exceed this standard (paragraph 10.6).</p> <p>There was explicit support given to Policy KBR35 at Reg 16 stage by the GLA (99), BESA (45), Camfil (76), the Federation of Environmental Services Trade Associations (91), the Brompton Association (98), the Royal Parks (56), Clean Air in London (52), Cundall (88), MSP Strategies (10), the Knightsbridge Association (80), the Belgravia Neighbourhood Forum (75), the Environmental Industries Commission (81), the London Taxi Drivers Association (82), the Friends of Hyde Park and Kensington Gardens (20), Pegasi (35) and private individuals (5, 17, 22, 23, 24, 34, 36, 37, 41, 43, 71 and 78).</p>
38.	KNP62	WCC	KBR36: No evidence has been provided that these policy requirements do not undermine development viability, as required by NPPF paragraph 173.	<p>Improving energy efficiency and producing local renewable energy are key measures the Forum has identified it can implement to assist the UK to meet its legal obligations to reduce greenhouse gas emissions under the Climate Change Act and to avoid the potentially catastrophic impacts. Further, the Forum is keen to encourage good development practices which the consultation responses received suggest are supported by industry. The Sustainability Report submitted at Reg 16 stage considered viability. The Forum also draws the Examiner's attention to the responses from Cundall, MSP Strategies, the Building Engineering Services Association (BESA), Clean Air in London and the Environmental Industries Commission. These organisations, which are working at the forefront of environmental technologies and practices, often on behalf of commercial enterprises, support this policy.</p>

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			<p>Criterion C relates to matters about the operation of buildings after construction. They cannot be enforced through the planning process. We would suggest its omission.</p>	<p>To support the Forum's position, the following wording should be added to the end of para 10.6: <i>"10.6 ...were attributable to human made PM_{2.5}. <u>It is also important to recognise that the health and societal impacts associated with poor air quality represent a significant economic cost. For instance, in London only, PM_{2.5} and NO₂ in 2010 have an associated mortality burden of £1.4 billion and £2.3 billion in 2014 prices, respectively¹. These costs are often ignored in assessing the economic benefit of development. There are therefore potentially significant economic benefits to reducing air pollution.</u></i> ¹Source: 'Chapter 5 (page 7) - Economics of pollution interventions' in the 'Annual Report of the Chief Medical Officer 2017, Health Impacts of All Pollution - what do we know?', p151."</p> <p>The Forum notes this point and suggests the following amendment to KBR36(C): <i>"C. Development should <u>be designed to encourage future occupants to</u> avoid installing cooking, heating and/or water heating appliances which consume or combust fossil fuel. Any residual emissions to air from air conditioning, cooking or mechanical ventilation should be filtered using regularly maintained and best available technology before being released to the atmosphere."</i></p> <p>In the reasoned justification the following text should be added to the end of paragraph 10.12: <i>"10.12 ... <u>Back-up</u> On-site diesel generators <u>may be installed</u> will only be permitted for use in genuine and exceptional emergency situations. <u>Development could demonstrate that it is designed to avoid the need to install</u></i></p>

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			<p>The restriction of use of generators as set out in criteria E cannot be enforced through the planning process. A better approach might be to set a hierarchy for emergency generators which gives preference to non- or less-polluting options.</p> <p>Criterion F goes beyond the remit of a neighbourhood plan in seeking to impose how nationally prescribed standards are interpreted.</p>	<p><u>cooking, heating and/or water heating appliances which consume or combust fossil fuel by showing it is designed to have zero local emissions e.g. as an all-electric building.</u></p> <p>The Forum notes this point and suggests the following amendment to KBR36(E): <u>“E. Back-up generators should only be installed in buildings should only be used in for the purpose of maintaining power supply during an on-site emergency situations and alternatives to diesel generators should be considered.”</u></p> <p>This should be supported by the following amendments to para 10.8: <u>“10.8 Health, legal and climate imperatives and ambitions mean that development in the Knightsbridge Neighbourhood Area must contribute to reductions in emissions to air. No significant worsening of air quality must be allowed in areas where limit values are exceeded. Where limit values in the locality are not exceeded, a significant worsening of air quality may only be allowed except in exceptional circumstances where limited values are not exceeded in the locality and such increases can be justified by the principle of sustainable development. A legal opinion by Robert McCracken QC supports this interpretation. For the purposes of this policy, a predicted increase at a receptor of 0.1 microgram per cubic metre in any calendar year during construction or operation is considered ‘significant’.”</u></p> <p>The Forum wants to support developers to adopt the most locally appropriate sustainable design solutions which may in some circumstances be hindered by national guidance. The intention of Part (F) is to make it easier for developers</p>

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				<p>to implement all-electric buildings as Chelsfield wanted to do at The Knightsbridge Estate in Brompton Road i.e. instead of being incentivised by BREEAM scoring to propose two gas boilers and two combined heat and power units beside a highly polluted road. For this reason, the Forum considers it important that the criterion is retained. The Examiner is asked to note that RBKC's Local Plan (July 2015) is an example of borough level development policies referring explicitly to BREEAM standards e.g. Policies CE1 Climate Change and CE5 Air Quality.</p> <p>There was explicit support given to Policy KBR36 at Reg 16 stage by Cundall (88), BESA (45), MSP Strategies (10), Environmental Industries Commission (81), Clean Air in London (52), private individual (17) and private individual/ London Assembly Member (95).</p>
39.	KNP62	WCC	<p>KBR37: Whilst criteria A sets out that retrofitting of energy efficiency measures should be sensitive, the inclusion of support for double glazing given in criteria B will normally be inappropriate on listed buildings due to its conflict with statutory requirements to preserve their character. It should therefore be removed.</p>	<p>Improving the sustainability of our heritage assets will be key to their longevity and is necessary to ensuring the UK meets its legal obligations in the Climate Change Act. The Mayor of London has made the point that, in 2050, 80% of today's buildings will still be standing and it is 'critical that these properties are retrofitted with energy efficiency and decarbonisation measures' (see p.4 of the Clean Air in London Reg 16 representations). The Forum also questions therefore the blanket statement that Part B 'will normally be inappropriate on listed buildings' and the implications for sustainability. There are many examples of double glazed windows in Conservation Areas across the Area and there is no evidence of harm from this. There is also nothing to suggest that sensitive double glazing will harm the significance of a listed building in all cases as the Council seems to suggest.</p>

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				<p>It is therefore critical that the 175 listed buildings in the Area – which are all large buildings – are able to have double or secondary glazing fitted. The representations by a local resident (17) highlight how the necessary action has been frustrated but also how the quality of materials and design for retrofitting has improved significantly and rapidly. The Forum considers that Part B should remain.</p> <p>There was explicit support given to Policy KBR37 at Reg 16 stage by the Friends of Hyde Park and Kensington Gardens (20) and a private individual (17).</p>
40.	KNP62	WCC	KBR38: There is no reason to confine this policy to major development, and as we suggest omitting the different levels of development set out in Appendix G, we would suggest omission of the final sentence of the policy.	The Forum has no objection to the deletion of the final sentence of KBR38.
41.	KNP62	WCC	KBR39: Criterion A, when taken alongside paragraph 10.23, appears to indicate an intention that future tree planting should move away from London Planes in anticipation of a disease that is not yet present in the UK, despite them being iconic species in London garden squares. Such an approach is not supported. Policy should make clear that plant species will need to respect existing character and heritage for consistency with paragraph 58 of the NPPF that planning policies should respond to local character and history.	The importance of trees to the character of the area was identified by the community during the development of the KNP. The Forum therefore wishes, through Policy KBR39, to ensure that trees remain an attractive and valuable feature in the Area over the long term. This will require resilience to climate, disease and pest risks. In this respect, some diversification away from Plane trees may be necessary to reduce the risk of catastrophic loss to the Area. Please note that official guidance referred to in the Knightsbridge Evidence Base comments, "Highly destructive disease of plane trees, appears to be of increasing risk due to spread through France" and that "The pest's potential to cause economic, environmental or social impacts in the UK is 'Large'" (UK Plant Health Risk Register Details for

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			<p>Criterion B covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan. It also goes beyond existing legislative requirements, so not enforceable.</p> <p>Criterion C covers matters that may not require planning permission and therefore outside the scope of a neighbourhood plan.</p> <p>Criterion D cross refers to Appendix E, which sets out onerous procedural matters beyond the scope of a neighbourhood plan. In particular, neighbourhood plans cannot dictate procedural requirements on the City Council as set out in E1.2</p>	<p><i>Ceratocystis platani</i>, Defra, 2013 – pest risk analysis). Local risks to trees were also highlighted in an article by the Royal Parks in the Knightsbridge Association's Annual Report for 2017 (see Figure H at the end of this table) with 'plane wilt' listed first among 'very serious diseases on the horizon which could prove devastating to London's tree population'. It should be pointed out that the policy was supported at Reg 16 by the Woodland Trust which referred to it as a 'best practice example'.</p> <p>The policy signposts matters of importance within Knightsbridge that are likely to have significant adverse impacts. The works affected would either be 'exempt' or subject to wider publicity or public consultation which would allow the community to consider the application properly.</p> <p>The Forum proposes the following amendment to KBR39(C) to improve the policy: <i>"C. Proposals for planning permission which include the to replacement or planting of trees should demonstrate compliance with good arboricultural practice for urban trees and enhance the landscape character and amenity of the Knightsbridge Neighbourhood Area."</i></p> <p>The intention of this part of the policy was re-confirmed in the erratum schedule submitted by the Forum at Reg 16 stage. This proposed that KBR39(D) be amended as follows: <i>"D. Proposals to fell, prune, maintain, replace or plant trees in Local Green Spaces (as listed in Policy KBR12 – Protection and maintenance of Local Green Spaces) or otherwise elsewhere, in all cases in accordance with an adopted Tree</i></p>

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			<p>Criterion E covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan.</p>	<p><i>Management Plan (as described in Appendix E) that is no more than five years old, will be strongly supported."</i></p> <p>The Forum also wishes to make clear that Part (D) represents an 'option' for an applicant as opposed to something that they are obliged to address in a particular way. It does not require the adoption of a Tree Management Plan but simply supports proposals that accord with such a plan.</p> <p>There is no requirement on the Council to consider or adopt a Tree Management Plan. Furthermore, the Forum is proposing amendments to the Glossary and Appendix E to define the role of a Competent Person as a suitable alternative person to approve a Tree Management Plan. The Forum does not therefore consider that Appendix E1.2 dictates a procedural requirement for WCC. Moreover, the amendment to Criterion (D) proposed above should make clear that this applies only if a Tree Management Plan is in place.</p> <p>The Forum considers that such a requirement is necessary in order for the policy to provide a complete framework for the way trees are addressed by development proposals. A major development with a big space - for example, the Hyde Park Barracks strategic allocation - should have trees in it as part of its redevelopment and this criterion helps to establish the sort of trees, retention of trees, etc. To improve the policy, the Forum proposes the following amendments to KBR39(E):</p> <p><i>"To ensure that the benefits associated with trees are secured for the longer term, development proposals for</i></p>

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			<p>Criterion F relates to matters controlled through the highways authority rather than planning.</p> <p>Paragraph 10.24 fails to recognise that applications can often be supported by tree reports from non-independent tree surgeons or consultants, and appears to remove the City Council’s ability to scrutinise such reports.</p>	<p><i>Level 3 developments or larger with open ground should be accompanied by a Tree Management Plan which includes the maintenance, replacement or planting of trees. as part of a Tree Management Plan Compliance with the Tree Management Plan may be secured through the imposition of a planning condition or legal agreement.”</i></p> <p>The following amendments should also be made to Appendix E:</p> <p><i>“E1.1g. g. be endorsed by a Competent Person experienced in expert in urban forests, such as an Arboricultural...”</i></p> <p><i>“E1.2 ... The TMP should be owned by them and will be considered adopted when it is approved confirmed in writing by Westminster City Council (WCC) or a suitable Competent Person Westminster City Council. WCC should be invited to comment on or approve a TMP within a reasonable period e.g. two months. WCC should be requested to confirm or respond to the TMP within two months of its submission.”</i></p> <p>The Forum suggests that Part (F) is deleted.</p> <p>The Forum disagrees that this is what paragraph 10.24 is saying. WCC has powers to decide how to address such matters and one option available to it is to use the services of a recognised arboricultural expert. To improve the policy, it is proposed that paragraph 10.24 is amended as follows: <i>“10.24 Good arboricultural practice can could be demonstrated, in respect of this policy, by written approval</i></p>

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			<p>We would suggest this policy should be considerably shortened so it focusses on matters relating to land use and which can be enforced through the planning system. If the neighbourhood wishes to encourage different approaches it might consider doing so in a separate, non-statutory document.</p>	<p>from a <u>Competent Person</u> recognised expert <u>experienced</u> dealing in urban trees or <u>by</u> complying fully with the most recent British standards or nationally recognised guidance. It should be consistent with the principles for Tree Management Plans described in Appendix E. <u>For the avoidance of doubt, an Officer employed by The Royal Parks is considered to be a suitable Competent Person for this policy.</u></p> <p>The following definition of a Competent Person has also been added to the Glossary: <u>"Competent Person – a person with a recognised relevant qualification, sufficient experience in dealing with the matter, such as urban forests or urban trees, and membership of a relevant professional organisation."</u></p> <p>For the reasons explained above, the Forum does not agree with WCC's suggested alternative approach.</p> <p>There was explicit support given to Policy KBR39 at Reg 16 stage by the Woodland Trust (94), Friends of Hyde Park and Kensington Gardens (20), the Royal Parks (56), the London Parks and Gardens Trust (21), the Montpelier Square Garden Association (70), Matthew Bennett (of the Soho Society) (48) and private individual (41) and private individual/London Assembly member (95).</p>
42.	KNP62	WCC	KBR40: It is unclear from criterion A how 'a minimum' will be determined, which raises issues of the deliverability of the policy.	<p>The Forum agrees and proposes the following amendment to KBR40(A): <u>"A. All Level 1 to 3 development (as described in Appendix G) should reduce minimise water consumption to a minimum through good design."</u></p>

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			Criterion B covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan.	<p>The Forum disagrees. The evidence base supporting the KNP demonstrates that there is a very serious, systemic problem with the drains in the Area. Part (B) represents one way to address that problem and the associated risk to property. To improve the policy, Policy KBR40(B) should be amended to state:</p> <p><i>"B. All Level 1 to 3 development is encouraged to be accompanied by a Sustainable Drainage Plan which demonstrates how the proposal has been designed to:</i></p> <p><i>a. address how clean and dirty water needs will be addressed locally;</i></p> <p><i>b. minimise how surface run-off, including storm water, will be minimised. In particular, development should demonstrate how it has sought to minimise the quantity and rate at which water is discharged directly into the drainage, sewerage and riparian systems, preferably applying principles that go beyond minimum compliance; and</i></p> <p><i>c. ensure that the drainage system will operate sustainably and with sufficient headroom within the capacity of water systems in the Knightsbridge Neighbourhood Area, taking into account the cumulative impacts of all other permitted local development (including that occurring outside the Knightsbridge Neighbourhood Area boundary)."</i></p>
43.	KNP62	WCC	KBR41: Criterion B covers matters of procedure rather than policy for determining a planning application, and is therefore beyond the scope of a neighbourhood plan.	<p>There is a considerable problem with noise in the Area and this can cause significant health problems. The policy signposts matters of importance within the Knightsbridge context which could arise from developments that are likely to have adverse impacts and seeks to influence the design of proposals to avoid these. Therefore the matters identified in Part B should be addressed by an applicant. The Forum also asks the Examiner to note that the New London Plan consultation document recognises this with the inclusion of</p>

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			Communal lighting as referred to in criteria C cannot be controlled through the planning process.	reference in 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).
			Criteria D is overly onerous, and no evidence has been provided of its impact on development viability. The planning system cannot insist on consideration of refurbishment options prior to redevelopment on all buildings – particularly where the proposal relates to something that is not a heritage asset.	<p>Part (C) mainly relates to the impacts of lighting in lifts and stairwells that are externally visible, e.g. One Hyde Park. In order to make this clear, it is proposed that KBR41(C) is amended as follows:</p> <p><i>“C. Proposals should be designed to ensure that €communal internal or external lighting, where externally visible, should be designed to reduce energy consumption, minimises light spillage and protects the amenity of light-sensitive uses such as housing and areas of importance for nature conservation.”</i></p> <p>The wording of Part (D) is clear that developments 'must demonstrate the highest <i>feasible</i> and <i>viable</i> sustainability standards...' (the Forum's emphasis). Therefore, by definition, it cannot have an unacceptable impact on development viability. In order to address the concerns regarding how onerous the policy is and the appropriateness of having to consider redevelopment options, the following amendments are proposed to KBR41(D):</p> <p><i>“D. All development and major refurbishments requiring planning permission must is encouraged to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and 'end of life' phases of development. In particular:</i></p>

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				<p><i>a. The sustainable refurbishment and reuse of existing dwellings, buildings and resources should be considered before any redevelopment options is encouraged.</i></p> <p>There was explicit support given to Policy KBR41 at Reg 16 stage by Cundall (88), Chelsfield (84), Clean Air in London (52), Bluepoint (63) and Matthew Bennett (of the Soho Society) (48).</p>
44.	KNP62	WCC	<p>KBR42: Criterion A glosses national policy and legislation and is unnecessary.</p> <p>Criterion B refers to process rather than policy for the determination of a planning application. It therefore falls outside the scope of a neighbourhood plan, and is covered by separate legislation.</p> <p>It is not the role of a neighbourhood forum or neighbourhood plan to dictate the consultation process developers and the City Council should follow, as set out in Appendix F and cross referred to in paragraphs 10.32-10.33. These are matters set out in national legislation. Furthermore, paragraph 10.33 relates to schemes the City Council would not be consulting on through planning applications.</p>	<p>The Forum was encouraged by WCC to include a policy similar to Policy S47 in WCC's own City Plan in order to demonstrate explicitly that 'sustainable development' is supported by the KNP. It is therefore surprising that WCC now seeks its removal.</p> <p>Part B is encouraging the design of development to be influenced in a meaningful way by the local community at an early opportunity. It therefore has the power to influence the way in which land is used in the neighbourhood area so it is not 'procedural'.</p> <p>There are no penalties for not complying with the policy or the Community Engagement Protocol (CEP) and so the policy cannot be said to 'dictate' the consultation process to be followed. Indeed, the CEP sets out 'guidance' on what is considered best practice by the local community. The Forum has proposed the following amendments to paragraph 10.33 to clarify roles and responsibilities: <i>"10.33 It is recognised that development outsidewhich impacts on the Neighbourhood Area can impact on it. is not only that proposed within the Area or within the wider area of interest. For example, mMajor infrastructure road, rail and air proposals, in particular Crossrail and airport</i></p>

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			<p>There are legal tests and requirements governing the use of planning obligations and the Community Infrastructure Levy and the neighbourhood forum does not have the power to modify or add to these. For these reasons we would suggest omission of paragraph 11.3.</p>	<p><i>expansion, are likely to have an effect on the community of Knightsbridge. The local community has a right to be properly engaged in relevant <u>the consultation decision-making processes</u>. Indeed, a Any major infrastructure development that is likely to adversely affect the quality of the air, water, soil or noise environment within the Neighbourhood Area could <u>has a right to be challenged</u>. The Neighbourhood Forum expects <u>reserves the right to be consulted on such proposals and may, where appropriate, to submit comments or lodge an objection accordingly.</u></i></p> <p>The Forum is entitled to a ‘say’ in the spending of the neighbourhood portion of the Community Infrastructure Levy and more generally in the approach to mitigating the impacts of development. Indeed, the making of the KNP would substantially increase, on its own, the amount of funds available locally by increasing the neighbourhood portion from 15% (capped) to 25% (uncapped). Paragraph 11.3 is an important and transparent approach to the use of potentially significant funds that has been refined through several stages of public consultation.</p> <p>In addition, as WCC should be aware, a Community Council could be designated to cover the Knightsbridge Neighbourhood Area following a successful referendum on the neighbourhood plan. It is therefore appropriate for the KNP to provide such guidance and the Council should not assume that it is the only body that could administer the neighbourhood portion of the CIL fund. See Regulation 59A(3) of the Community Infrastructure Levy Regulations 2010.</p> <p>The Forum therefore disagrees with WCC.</p>

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				There was explicit support given to Policy KBR42 at Reg 16 stage by the London Taxi Drivers Association (82), the Friends of Hyde Park and Kensington Gardens (20) and private individual/London Assembly member (95).
45.	KNP62	WCC	Appendix A – definition of heritage street lights is unclear and inconsistent with policy KBR3 wording of “heritage lights”.	The Forum's response to WCC's representation on KBR3 (Entry 9) would address this point in the policy, making it consistent with the definition in the Glossary.
46.	KNP62	WCC	Appendix C seeks to impose onerous processes on developers and the Council, that goes beyond the remit of a neighbourhood plan and has resource implications for the City Council. Construction issues are not unique to Knightsbridge and the City Council already has established policies and procedures to deal with Codes of Construction Practice and its enforcement. Seeking to impose different standards for one neighbourhood will unnecessarily complicate the City Council's enforcement functions. For these reasons we would suggest its omission. A better approach might be for the neighbourhood to encourage adoption of locally specific good practice through a separate non-statutory document.	The Forum's response to WCC's representation on KBR23 (Entry 26) addresses this matter. The Forum would like to draw the attention of the Examiner to the support given to Appendix C by the Institution of Civil Engineers (97), the Knightsbridge Business Group (68) and TfL (13) at Reg 16 stage.
47.	KNP62	WCC	Appendix E seeks to impose onerous processes that go beyond the remit of a neighbourhood plan in seeking to require, and then control, the content of Tree Management Plans. There is no formal mechanism by which Tree Management Plans could be adopted by the local planning authority, and any requirements would not	The Forum's response to WCC's representation on KBR39 (Entry 41) addresses this matter.

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			override the requirement for applications for tree work to be submitted to the City Council. For these reasons we would suggest its omission. A better approach might be for the neighbourhood to encourage adoption of locally-specific good practice through a separate non-statutory document.	
48.	KNP62	WCC	Appendix F seeks to impose onerous processes that go beyond the remit of a neighbourhood plan. Additional consultation requirements cannot be imposed on the City Council as the local planning authority through a neighbourhood plan, particularly as consultation requirements are governed by legislation. For these reasons we would suggest its omission. A better approach might be for the neighbourhood to encourage adoption of locally specific good practice through a separate non-statutory document.	The Forum's response to WCC's representation on KBR42 (Entry 44) addresses this matter.
49.	KNP62	WCC	Appendix G - No evidence has been provided for the threshold of scales of development in Appendix G, which has implications on the extent to which policies in the plan may be judged onerous in terms of effect on development viability. It also adds unnecessary detail and complexity to the plan. There are well-defined thresholds for major development set nationally and in the London and Westminster City plans; a further entirely separate set will simply add an unnecessary level of complication while	WCC highlighted during the development of the KNP the need to differentiate the application of some policies between different scales of development to avoid unnecessary financial burdens. WCC's Regulation 14 response dated 15 February 2017 welcomed the inclusion of the 'Scales of development' appendix in its general comments (Part B, page 6). The Forum has therefore taken care to adopt the above approach in individual policies aided by Appendix G which aligns to bandings used already by WCC. If Appendix G were removed, it would be necessary to replace references to it in many policies with less clear wording.

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			<p>doing nothing to contribute to sustainable development.</p> <p>Incidentally, under level 6 conservation area consent no longer exists.</p>	<p>The Forum notes also the need to address substantial refurbishment works, as defined in Appendix G, within the KNP in order to achieve sustainable outcomes over the life of the KNP. The viability of the KNP was assessed in the Sustainability Report.</p> <p>In arriving at the thresholds shown in Appendix G, and mindful of the development management responsibilities of WCC, the Forum has sought to align these as closely as possible with the categorisation listed by WCC for its pre-application processes (with the KNP's thresholds for 'minor' and 'medium' development being the same as those used by WCC for pre-application processes and the KNP's threshold for 'major' being the same as the WCC thresholds for 'major' and 'large scale' combined). Moreover, the Forum considers that it has simplified the approach because the WCC pre-application processes and its threshold for construction matters differ from one another and this seeks to align them in local requirements.</p> <p>The Forum notes this and proposes the following small amendment to Appendix G: <i>"Level 6 – Other For example, development involving trees or matters that require Conservation Area or other consent but not planning permission."</i></p>

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			We would strongly urge the omission of this Appendix. A better approach might be for the neighbourhood to encourage adoption of locally-specific good practice through a separate non-statutory document.	
50.	KNP62	WCC	Appendix H - The extent to which some projects listed in Appendix H could properly be paid from using CIL is questionable – e.g. “enforce clean safe and quiet to the full extent of the law” (general projects point i), and “tighten size and weight restrictions on large vehicles using local roads” (area specific projects point e). Others (such as provision of broadband infrastructure) will involve state aid. It is also unclear why emissions from Grade I listed buildings are targeted (area specific projects point f) ahead of unlisted buildings subject to less constraints.	Regulation 59C of the Community Infrastructure Levy Regulations 2010 states that money passed to a local council – or spent by a charging authority on behalf of a Neighbourhood Forum – must be used to fund: <ul style="list-style-type: none"> (a) ‘the provision, improvement, replacement, operation or maintenance of infrastructure; or (b) anything else that is concerned with addressing the demands that development places on an area.’ Para 59C(b) provides a broad definition of what CIL can be spent on, and one that is broader than that placed upon the charging authority themselves. It is considered that the items included in Appendix H represent appropriate matters that community proportion of CIL funds can be spent on. WCC also assumes that projects that potentially involve state aid will constitute unlawful state aid. That goes too far.
51.	KNP62	WCC	Figure 2b - Under figure 2b, the use of Hyde Park Barracks as military barracks is a sui generis use rather than C2a secure residential institution.	The Forum agrees with this and has suggested amendments to the Policies Maps at the end of this document.
52.	KNP10	MSP Strategies	Our only disagreement with the KNP is its general assumption against intensification. Knightsbridge is one of the best connected places in London with a number of London Underground stations and close to major National Rail termini. The Piccadilly Line is expected to be upgraded over the next decade greatly increasing capacity, which	The Forum supports the principle of more efficient use of land, particularly where this protects and enhances the environmental assets which are so valuable in a Central London location. However, this must also recognise the context in Knightsbridge, which is a relatively low rise area with a very significant and unique heritage and character which constrain the way in which development can come forward. The Forum does not consider that the KNP has a

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			should allow development for a larger permeant Knightsbridge population. While understanding the sensitive location with the number of listed buildings and it being a major cultural and educational centre we would recommend toward supporting intensification. These new buildings need not necessarily tall but they can and should be dense.	'general assumption against intensification'. The policies in the KNP are considered to reflect this whilst still providing opportunities for development to maximise the development potential of sites.
53.	KNP10	MSP Strategies	KBR14: We do oppose the construction of further towers on the site at the same height as the current Barracks building. A small cluster of tall buildings on this site alone would not greatly affect the area and would play its part in alleviating the pressures on the London housing market.	The Forum notes this comment but does not consider that the KNP should pre-determine what any scheme design or masterplan might propose.
54.	KNP10	MSP Strategies	<p>We support strongly the proposal for generally parking-free new developments and the delivery of future-proofed EV charging infrastructure.</p> <p>We note that London's electricity grid is already under some strain already with the West End being an area of particular concern.</p> <p>The potential up-front costs of upgrading local sub-stations can run into millions of pounds, which can affect the viability of development or the installation of such infrastructure.</p>	The Forum notes that point being made in respect of the scale of infrastructure investment required and the potential impact on viability. The wording of Policy KBR32(E) 'encourages contribution to the provision'. As such, it is recognised that investment in this type of infrastructure is strategic and needs to be pooled from a number of sources. In this regard, this could include use of CIL funds.

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55.	KNP13	TfL	KBR14: Welcome the requirement that car parking for residential use should 'aim for significantly less than one space per unit'. However, suggest this goes further to specifically support 'car-free' (bar Blue Badge) development. This is in line with emerging draft new London Plan policy, would support policies elsewhere in the plan that seek to reduce traffic congestion and improve air quality, and would be more consistent with Policy KBR 31 A (motor vehicle use).	The Forum notes the point being made but considers that 'encouraged to' is the required wording in order that the policy is in general conformity with adopted London Plan.
56.	KNP13	TfL	KBR32: Part C mentions 'electric cycle hire'. No such scheme currently exists yet in London, so perhaps the supporting text could clarify this policy?	The Forum proposes the following addition at the end of paragraph 7.16: <u>"...The Forum understands that one or more electric bicycle hire operators will also be seeking sites in London from 2018."</u>
57.	KNP13	TfL	Appendix D: D2.0 a. mentions Superhighway CS10. The cycle superhighway along South Carriage Drive, which has already been implemented, is the East-West Cycle Superhighway, or CS3. CS10 no longer exists as a named project on the TfL website.	The Forum notes this and proposes the following amendment to Appendix D, D2.0(a): <i>"a. The implementation and improvement of the Central London Cycle Grid, East-West Superhighway CS10 and the provision of further cycling routes that would improve access to the Knightsbridge Neighbourhood Area.</i>
58.	KNP17	Lorraine Craig	KBR37: Provides expert evidence supporting the policy	Forum agrees. No change to KNP.
59.	KNP20	Friends of Hyde Park and Kensington Gardens (FHPKG)	KBR13: Control of tree management on the MOL should remain with The Royal Parks. KBR14: Change of use from barracks would be resisted by FHPKG.	Forum agrees. See below. Noted. Forum's proposals follow allocation of the site for housing by Westminster City Council

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			<p>KBR26: Albert Memorial is in Kensington Gardens and closed at night.</p> <p>KBR27: Area surrounding Albert Memorial is part of Kensington Gardens.</p> <p>KBR37: Supports The Royal Parks if they could improve energy efficiency levels, heat loss and emissions from several Listed lodges along the perimeter of Hyde Park.</p> <p>KBR39: Tree stock in MOL are actively managed by The Royal Parks and should remain so.</p> <p>Appendix E: Support TMPs in the Plan and commend work by The Royal Parks.</p>	<p>Noted. It is outside the neighbourhood area.</p> <p>Noted. It is outside the neighbourhood area.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum accepts this point and suggests adding new final sentence in paragraph 10.24: <i>"...For the avoidance of doubt, an Officer employed by The Royal Parks is considered such an expert."</i></p> <p>Noted. Addressed in Entry 41.</p>
60.	KNP30	Princes Gate Mews RA	<p>In short, we consider in certain respects the Plan and parts of its supporting documents:</p> <ul style="list-style-type: none"> do not provide an accurate description of the area termed by the KNP as the Strategic Cultural Quarter – mis-describing its character and failing fully to describe or take into account the large numbers of residents/residential homes and the variety of architectures and buildings in the area and other uses of property there. 	<p>One of the sub-objectives of the KNP (6.2) recognises the importance of meeting the needs of residents within the Strategic Cultural Area (SCA). The policies of relevance to the SCA – KBR26 and 27 – are considered to recognise the need to balance the range of people and institutions that live and work in the area. They must be read with other policies in the Plan which balance them. Moreover, following reps made by RBKC, amendments have been proposed to the supporting text in para 6.7 and to KBR27(B) to address the risk of any residual impacts on residents adjoining the area.</p> <p>The wording amendments and additions proposed to KBR27 and the supporting text further address this matter.</p>

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			<ul style="list-style-type: none"> incorrectly refer frequently to the needs and dominance of institutions in a much wider area than that actually covered by the Forum. Many institutions highlighted are entirely outside the area covered by the KNP yet their existence is used to justify proposals in the KNP – and these are proposals that would have a significant impact on a Borough and residents who live outside the area covered by the KNP who have no vote. This blurring of the role of the KNP into areas outside its coverage where it has no locus is misleading and undemocratic. This mischaracterisation of the area has resulted not just in inaccuracy but, more significantly, in unbalanced and partial proposals that favour the needs and wishes of the educational and cultural institutions over those of others. And this is to the significant detriment of others, not just in the area covered by the KNP, but in the Boroughs of Westminster, Kensington and Chelsea and in London as a whole. 	The Forum disagrees and considers that the text in Part One and the evidence in Part Three appropriately characterises the area.
61.	KNP30	Princes Gate Mews RA	With reference to paras 0.13, 0.26 and Community 5.0 heading: While the KNP text here acknowledges that the Westminster City Plan (WCP) CAZ recognises the very residential character of Knightsbridge and the need to “Protect and	It is not for the KNP to quote large sections of the City Plan. The KNP has fully taken into account the strategic policies in the City Plan as well as the London Plan and has ensured that it is in general conformity with these policies; this does not mean that the approach taken in the KNP has to be the

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>enhance existing residential amenity and mix", the description in the KNP here and later in supporting documents (such as the statement of compliance with basic conditions):</p> <ul style="list-style-type: none"> • fails to highlight significant/relevant other statements in the WCP which set out WCP intent and requirements for residential development and preservation of residential amenity in the Borough including this area in a manner different to that described in the KNP; and • later in the KNP, dis-applies the KNP's own stated intent and policies (e.g Policy 5) and the policies of the WCP by putting forward proposals that fail to "Protect and enhance existing residential amenity and mix" and allow the "character and function of the long-standing residential communities" to be "lost by encroachment of other uses" by giving absolute priority to cultural/educational uses in the area the KNP terms the Strategic Cultural Quarter 	<p>same as that taken in the City Plan. There is more detail provided on this in the Basic Conditions Statement.</p>
62.	KNP30	Princes Gate Mews RA	<p>KBR1: This policy is too restrictive and does not allow for development to respond to the specific local and existing context in this area - nor does this policy reflect National Conservation Area Policy. Not every existing building in this area is large, or in red brick or terracotta. Large scale buildings in the wrong</p>	<p>The policy provides a framework to ensure that the design of development enhances the character of the Area; it does not restrict what development may achieve.</p> <p>The point regarding specificity of, for example, red brick or terracotta, is noted. In response to the representations by WCC on KBR1, amendments have been proposed that</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			location in this area could have damaging impacts on the living conditions of residents in the area or indeed workers in their offices and there are significant buildings in this area built in stone and other materials which add to the character of the area. This policy should be made less prescriptive and required to respond to National policy on Conservation Areas and Borough policy on planning development.	require development to respect the characteristics of the area.
63.	KNP30	Princes Gate Mews RA	<p>KBR8: This policy is also too restrictive and sweeping/absolute and does not allow for development to respond to the specific local and existing context in this area. Exhibition Rd is an entirely different road to others mentioned (relatively recently it has been transformed through major development into a form of shared space – a process that significantly improved pedestrian movement). Categorising this road alongside all the other main roads which have an entirely different character fails to respond to the local context – a key requirement of National and WCP policy – and also fails to take account of the fact that other road users have already been required to reduce their use of the road to improve pedestrian movement in this area (which renders the proposal unbalanced).</p> <p>Nor does the KNP text take account of the fact some of these main roads – including</p>	<p>The intention is to improve movement along pedestrian routes where they are congested to achieve the associated benefits of active travel. The wording is about movement 'along, across and adjacent to' Main Roads, not pedestrianisation <i>per se</i>.</p> <p>The nature of the types of improvements which this policy could facilitate will be very localised, i.e. addressing</p>

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			<p>Exhibition Road - extend outside the area covered by the KNP and indeed outside the Borough of Westminster. Changes which "improve pedestrian movement along, across and adjacent to Main Roads in the Knightsbridge Neighbourhood Area" and "Copenhagen Crossings" could have significant impacts outside the area covered by the KNP in terms of displaced traffic, activity and pedestrians and design incongruity. As such, any such changes should be subject to consultation with and approval from not just Transport for London but also the RB of Kensington and Chelsea who will have residents and businesses affected by any change to Brompton Road and Exhibition Road – and potentially from changes to other roads if this results in congestion on roads and pavements outside the Borough.</p>	<p>particular bottlenecks at specific points along streets that might otherwise have a good flow of pedestrians. Therefore the impacts are highly unlikely to be felt significantly beyond the location in question. To clarify this, it is proposed that the following text is added to the end of paragraph 2.5:</p> <p><u>"...The nature of the types of improvements which this policy could facilitate will be very localised, with the intention being that they address particular bottlenecks at specific points along streets that might otherwise have a good flow of pedestrians. The impacts are highly unlikely to be observed beyond the location in question."</u></p>
64.	KNP30	Princes Gate Mews RA	<p>KBR24: These proposals are in clear conflict with the policies set out in both the WCP and the London Plan – and it is puzzling that the KNP in its Evidence Base (para 6.4) has chosen to quote from part (but only the part that stresses the importance of universities) of the paragraph in the London Plan which expressly contradicts the KNP proposals set out here.</p> <p>The WCP sets out in considerable detail the shortage of housing in the Borough and the</p>	<p>The KNP wants to encourage a diverse mix of accommodation to support a range of potential needs to create a socially diverse community and improve cultural and social awareness. In any event, KBR24(B) does not require any form of occupancy restriction to be placed upon development. Rather, it encourages the type of housing to be delivered which will give a greater chance of local workers living locally. This is in response to many of the institutions and businesses identifying that the rising cost of living, including travel, was making it more difficult to recruit staff across a range of roles, particularly lower paid roles.</p>

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			<p>serious impacts this has on Borough residents – including a waiting list of 5,500 ‘households in priority need’. The need for and the painfully slow process of creating any new homes in the Borough – let alone affordable homes – is documented in detail in the WCP and there are finite limits on the creation of any form of housing in the Borough. In no shape or form can students attending or workers in cultural institutions be considered ‘households in priority need’. There can be no justification for the special treatment proposed for students and workers in cultural institutions (and for accommodation that might be built for them) and for them alone - in the KNP. Allowing this prioritisation would put Borough residents in need and all other workers in the Borough at an unfair disadvantage. Equally, the only category of non-resident listed as in need of specialist housing provision in the Borough in the WCP is that of “key workers” a Government definition (eg. covering nurses and firefighters) that includes neither students nor workers in cultural institutions. If workers are unable to afford to commute to the institutions they – like every other employer in the Borough – will need to pay higher wages not seek special privileges that by displacement would put many 1000s of others (who seek permanent accommodation in the Borough and have a far stronger claim</p>	<p>Whilst this representation makes reference to para 6.4 in the Part Three (Evidence base) document, this relates to Policies KBR26 and KBR27. Paragraphs 5.2 and 5.3 in Part Three relate to KBR24 and provide detail regarding the needs of those wishing to live and work in Knightsbridge, rather than solely focussing on universities.</p> <p>There was explicit support given to Policy KBR24 at Reg 16 stage by the GLA (99), the Knightsbridge Association (80) and the Exhibition Road Cultural Group (73).</p>

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			<p>for assistance with the costs of living in the Borough) at a disadvantage.</p> <p>The London Plan goes further, stating that student housing should be addressed <u>“without compromising capacity for conventional homes”</u> and stating that any further provision of student accommodation in the 4 central London Boroughs would challenge this objective not to compromise capacity for conventional homes. It points to the fact that student accommodation is already excessively concentrated in central London Boroughs (including Knightsbridge) that students put pressure on other elements of housing stock and that the London Plan would <u>“encourage a more dispersed distribution of future provision taking into account development and regeneration potential in accessible locations away from the areas of greatest concentration in central London”</u></p>	
65.	KNP30	Princes Gate Mews RA	KBR26: We completely agree that existing Cultural, Research and Educational uses in the area covered by the KNP should be conserved. We also note the WCP Policy S9 is clear that “New tourism, arts, cultural and educational uses and appropriate town centre uses should be directed to the Strategic Cultural Area” and that Policy S27 states “new international and nationally important uses will be encouraged within the	The cultural, research and educational institutions of Knightsbridge are part of what makes the area special. The policy does not seek to ‘favour’ cultural/educational uses. Rather, it recognises that the cultural/educational institutions have a range of needs which they wish to address if they are to maintain their world-class status. Equally however, nowhere does it suggest that this should be at the expense of other users/occupiers of the SCA, particularly residents. The KNP has to be read as a whole and it is clear from the wider policies in the KNP that

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			<p>Core Central Activities Zone” This is agreed policy – although we note the London Plan also states “4.34 Culture also plays a valuable role in place shaping, especially by engaging younger people in wider community activity. It is therefore important to expand London’s cultural offer beyond central London”</p> <p>However, the KNP in this entire section goes well beyond this agreed policy bringing forward proposals that favour cultural/educational uses, and developments in support of them, above all other sorts of development and uses and above the needs of others in the Borough. It effectively says all development in the area should be for educational or cultural use. It also supports such developments in absolute terms – thus presenting unbalanced recommendations that do not take into account the needs of residents in the area or the potential impact on local residents of these absolute recommendations for support of cultural/ educational development. It also does not acknowledge, let alone take into account other WCP policies in relation to limiting the nuisance developments such as they propose could cause to residents and neighbours.</p> <p>There can be no justification for the KNP’s statement “Development within the Strategic Cultural Area should be guided by Prince</p>	<p>protection of residential amenity is a key priority for the Neighbourhood.</p>

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			<p>Albert's ambitions for the Area. ... the primary consideration should be the extent to which new development is in keeping with this original vision." These ambitions are in conflict with the WCP and London Plan's repeatedly stated policies towards the area, including policies on housing. Indeed, the KNP's description of the area as deriving its character only and solely from the educational and cultural uses in the area is also in conflict with the WCP which says of Knightsbridge "3.42 Lying west of the International Shopping Centre of Knightsbridge, residential use dominates this area" and in relation to S9 states "This policy recognises the two very different aspects and roles of this area: one of international importance to arts, culture and education, and the other of very residential character. This approach ensures that the character and function of the long-standing residential communities are not lost by encroachment of other uses."</p> <p>The KNP Evidence base also implies that residential properties came late to the area, stating "The cultural and educational policies seek to honour the original aims of the Royal Commission through the continued promotion of the Area's unique cultural assets...while recognising that the Area has matured into an established and thriving</p>	

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			<p>residential area.” In fact the boot is on the other foot - many residential properties in the area were in existence long before the educational institutions were even founded. The KNP here also as stated above:</p> <ul style="list-style-type: none"> • does not provide an accurate description of the – mis-describing its character and failing fully to describe or take into account the large numbers of residents/ residential homes and other uses of property in the area. The London Plan map page 156 Map 4.2 London’s Strategic Cultural Areas itself states “Site boundaries shown on the map are indicative and include areas with other land uses” • incorrectly refers frequently to the needs and dominance of institutions in a much wider area than that actually covered by the Forum. Many institutions highlighted are entirely outside the area covered by the KNP yet their existence is used to justify proposals - and these are proposals that would have a significant impact on a Borough and residents who live outside the area covered by the KNP who have no vote. This blurring of the role of the KNP into areas outside its coverage is not in line with locus of a Neighbourhood Plan. • through mischaracterisation of the area, contains not just in inaccuracy but, more 	

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			significantly, unbalanced and partial proposals that favour the needs and wishes of the educational and cultural institutions over those of all others. And this is to the significant detriment of others, not just in the area covered by the KNP, but in the Boroughs of Westminster, Kensington and Chelsea and in London as a whole.	
66.	KNP30	Princes Gate Mews RA	KBR26/27: The KNP supports ancillary developments "within the Strategic Cultural Area which help to broaden the appeal and promote the remits of cultural, education and research organisations" of all kinds. There is no clear definition of ancillary developments or any limitation on what this might entail and the support is in blanket and absolute terms – thus presenting unbalanced recommendations that do not take into account the needs of residents in the area or the potential impact on local residents of these unqualified recommendations for support of these developments. The KNP policies here also do not acknowledge, let alone take into account other WCP policies in relation to limiting the nuisance ancillary developments (including entertainment uses, cafes, canteens and retail outlets) and servicing of and deliveries to them can cause to residents and neighbours. Significant nuisance is already causes to residents now by such 'ancillary' developments in the	Small scale pop-up events can increase the attractiveness of the area as a place to live and help to strengthen the area's economy. The policy is not intended to permit 'nuisance' developments which otherwise would not be permitted, including outside or on-street activities which would be likely to impact on the amenity of residents. As is stated in para 6.7, "any ancillary development should not serve as an attraction in its own right <i>and should be sited, serviced and managed within the associated host institution</i> ". The Forum considers that it has taken full account of the strategic policies of the City Plan and London Plan. Further, the KNP has to be read as a whole and it is clear from the wider policies in the KNP that protection of residential amenity, from for instance nuisance noise impacts, is a key priority for the Neighbourhood.

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			<p>cultural and educational institutions in the area and several proposals for 'ancillary developments' in recent years have been refused by Westminster Council as they were considered to represent an unacceptable risk of harm to residents. This KNP policy represents an unbalanced blank cheque which is not in line with the WCP's policies.</p> <p>The KNP also takes it as read that "Temporary and pop-up events requiring planning permission" <u>will</u> take place in the area and asks only that "Proposals ... show how any potentially adverse impacts on the amenities of established residents and other occupiers in the area have been minimised".</p> <p>No justification for such an assumption that such events are without doubt appropriate and should take place in a residential neighbourhood has been provided. Nor is there any acknowledgement in the main KNP that a current Key Decision Policy (Royal Borough of Kensington and Chelsea's Key Decision Report dated 26 September 2011) is in force, already governs the nature, frequency, number and duration of events in Exhibition Rd in the KNP area and that it conflicts with the KNP policy. The KNP should reflect not conflict with this Key Decision policy which governs use of the Road. This policy acknowledges that the north of</p>	<p>This is not 'taken as read'. Policy KBR27 places certain requirements on proposals for pop-up events which require planning permission, one of which is explicitly identified as minimising the impact on the amenities of local residents. If an application is unable to demonstrate sufficient minimisation of its impacts then it should be refused. Further, the KNP does not replace or override specific conditions placed upon the siting of such events in other Local Plan policies. It adds additional local considerations to strategic policies.</p>

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			<p>Exhibition Rd is unlikely to be suitable for temporary and pop-up events due to its highly residential character. Nor does the KNP refer to the need to consult and agree events in the area – and in particular in Exhibition Rd as this is a requirement of the Key Decision - with the R.B. of Kensington and Chelsea, whose residents can be highly impacted upon and inconvenienced by events in any part of Exhibition Rd or in its vicinity. In addition, the R.B. of Kensington and Chelsea are the responsible body for managing the carriageway of Exhibition Rd.21. It is notable that policies KBR 26 and 27 are also inconsistent with policy KBR16 in that they offer significantly weaker protections for residents against nuisance than the protections set out in KBR 16.</p> <p>Nowhere do policies KBR 26 and 27 say that ancillary uses and temporary and pop up events are confined to the normal day time, nor do they say (as in KBR 16) proposals for new cafes, bars, hot food takeaways and restaurants in local roads “must demonstrate that they will have no adverse impact on residential amenity” including from “ the potential for noise, disturbance or odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises”. None of the protections set out in KBR 16 in</p>	<p>This response seems to consider the policy in isolation which it should not do. The requirements of Policy KBR16 in respect of new cafés, bars, hot food takeaways and restaurants (as opposed to pop-up activities) would apply in the Local Roads within the SCA. These Local Roads are where the majority of residents within the SCA live.</p>

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			these circumstances are extended to the residents in the Strategic Cultural Area – it merely says proposals for events should minimise impacts on residents. This too demonstrates that the proposals in KBR 26 and 27 are unbalanced in that they favour the needs and wishes of the institutions over and above the needs of residents and other users of the area.	
67.	KNP31	Onslow NA	<p>The KN by introducing their Policies KBR 26 and KBR 27 (both concerning The Strategic Cultural Area) in 'Part One', are seeking to extend their influence outside their defined neighbourhood area into an area where the local residents have no vote on the matters they promote.</p> <p>It would seem that policy KBR 26 of the KNP is contrary to one of the Basic Conditions, namely: "be in general conformity with the strategic policies of the development plan for the area;"</p> <p>In the Westminster City Policy where in section S 9 the policy for KNIGHTSBRIDGE is stated as: "New tourism, arts, cultural and educational uses and appropriate town centre uses should be directed to the SCA (Strategic Cultural Area)." With the reasoned justification stating "This policy recognises the two very different aspects and roles of this area: one of international importance to</p>	<p>The policies in the Plan can only apply to the identified Neighbourhood Area. They must also be read together. The Forum is proposing to address all the points made by RBKC in its Regulation 16 representation to address the risk of any residual issues.</p> <p>It is not a requirement of the KNP to identify, list or reproduce the wording of strategic policies in the City Plan or the London Plan. In most instances, such duplication is unhelpful and does not add to the policy. The strategic policies should be read alongside the policies in the KNP.</p> <p>The Forum considers that this section of the KNP meets the Basic Conditions and there is no justification for striking it out of the KNP.</p>

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			<p>arts, culture and education, and the other of very(sic) residential character. This approach ensures that the character and function of the long-standing residential communities are not lost by encroachment of other uses” But Policy KBR 26 introduces paragraphs A,B,C and D, none of which makes any mention of the residential or ‘town centre uses’ Further in the Westminster City Policy under ‘Arts and Culture’ (page 108) para 4.35 Westminster states “.....The Council works with neighbouring boroughs with respect to the Strategic Cultural Areas,.....” KN policy KBR 26 makes no reference to ‘neighbouring boroughs’. Similarly, Policy KBR 27 does not make mention of ‘neighbouring boroughs’. Consequently the Onslow Neighbourhood Association requests the inspector to strike out sections 6.01,6.02, 6., 6.1 through to and including 6.7, 6.9, 6.10 (including policy KBR 26 and policy KBR 27) as well as Sub-Objective 6.2 from the draft Knightsbridge Neighbourhood Forum Plan Part One. And to strike out in Part Two on page 16 the section ‘Culture and Education’. And in Part Three to delete pages 66 through to and including 73 ‘Knightsbridge Culture and Education’</p>	

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
68.	KNP45	BESA	Industry support and advice for KBR36 and KBR37 including TM54 in paragraph 10.14	Forum notes support. No change to KNP.
69.	KNP47	Kensington Society	KBR26/27: Exhibition Road is approximately half in Westminster and half in RBKC. We have fears that the Forum policies direct the use of the entire road, sanctioning unlimited numbers of events and changes from increasing size of the pavement to narrowing the road and effecting traffic flow. RBKC has the majority of the major museums with the most visitors, while the Forum area is primarily land use the Imperial College with evening Royal Albert Hall. The Forum's encouragement for increase in uses and diversity in the type of users, extension of hours for eating establishments from street, restaurants and entertainment developments within their limited institutions but encouraged beyond, will have an adverse effect on the entire area and in particular the RBKC residents. The uses of the road is control via Key Decision and variation to the Key Decision is not a Neighbourhood Plan prerogative.	The policies in the KNP can only apply to the identified Neighbourhood Area. They must also be read together. The Forum is proposing to address all the points made by RBKC in its Regulation 16 representation to address the risk of any residual issues.
70.	KNP47	Kensington Society	KBR24: The unrealistic proposal to restrict development to cultural and educational development and only three residents for such use, key-workers, is uncontrollable. Aspirational but unworkable with the shortage of housing throughout the area.	The Forum wishes to make clear that KBR24(B) is not requiring any form of occupancy restriction to be placed upon development. Rather, it is intending to encourage the type of housing to be delivered which will give a greater chance of local workers living locally. This is in response to many of the institutions and businesses identifying that the rising cost of living, including travel, was making it more

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				difficult to recruit staff across a range of roles, particularly lower paid roles.
71.	KNP48	Matthew Bennett	<p>KBR22: Urge that all developers should make provision not just for storage of waste but for the separation of different material streams for recycling and that proposals which do not contain adequate facilities should be resisted.</p> <p>KBR31: Stronger support should be given to freight consolidation in the light of increased congestion caused by small van deliveries often caused by internet shopping. Suggests locations for lockers or sites which could be used for micro consolidation centres.</p> <p>KBR36: Greater emphasis needed to achieve cooling through natural ventilation where possible or energy efficient cooling systems as an integral part of development.</p> <p>KBR39: Consider planting smaller tree species in containers where roots might otherwise interfere with underground pipework and services.</p> <p>KBR41: Plan might wish to restrict 'out-of-hours' deliveries to certain hours.</p>	<p>Noted. Forum's policy 'encourages' this approach rather than 'requiring it'.</p> <p>Noted. Forum 'encourages' this approach rather than 'requiring it'.</p> <p>Noted. Forum will consider in future revisions to the Plan. No change to KNP.</p> <p>Noted. Forum will consider in future revisions to the Plan. No change to KNP.</p> <p>Noted. Forum has included such an action in Part Two and would consider its inclusion in an appropriate policy in any future review of the Plan.</p>
72.	KNP49	Westminster Cycling Campaign	KBR29: In the draft Knightsbridge Neighbourhood Plan we do not see this "ambitious aim to reduce Londoners' (referencing draft London Plan 2017)	The Forum considers that Westminster Cycling Campaign may not have realised that proposals supporting cycling and walking were moved from within policies KBR33 and KBR36 at Regulation 14 stage to Appendix D of Part One at

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			dependency on cars in favour of increased walking, cycling and public transport use." Policy KBR29: Pedestrians Within The Movement Hierarchy that states "H. Any development proposal which enhances the safety or provision of Advanced Stop Lines for cyclists on Brompton Road or other Main Roads is encouraged" demonstrates faint support for cycling infrastructure and falls far short of "providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable".	<p>Regulation 16 stage i.e. the proposed measures have arguably been strengthened, not removed. This responded to feedback from others to separate policy wording from long 'lists'.</p> <p>The Forum asks the Examiner to note that the ambition of the KNP to encourage active travel is clear as far as it can work within the legal framework of what a development plan, and a neighbourhood plan in particular, can achieve. This is particularly so when Policy KBR29 is read alongside Policy KBR28 which aims to ensure that more infrastructure to enable active travel is provided within new development and Policy KBR31 which seeks to make development car free. It should also be noted that, in response to representations made by WCC, the Forum has suggested that Policy KBR29(H) be deleted.</p>
73.	KNP49	Westminster Cycling Campaign	KBR31: In the draft Knightsbridge Neighbourhood Plan we do not see tangible policies that would support "the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041". Policy KBR31: Motor Vehicle Use states that "A. In line with the London Plan Policy 6.13, all new development, and particularly that of Level 3 or larger (as described in Appendix G), is encouraged to be motor vehicle-free with the exception of designated parking for Blue Badge holders." Given that Knightsbridge is in a highly accessible location in London's Central Activities Zone, we believe that for the Knightsbridge Neighbourhood Plan to	<p>The Forum considers that the suite of travel policies, coupled with policies such as KBR8 relating to movement along, across and adjacent to Main Roads, provide tangible support to the delivery of the Mayor's target.</p> <p>The KNP is not able to require motor vehicle-free because this would be in conflict with the strategic policies of the London Plan. Rather, Policy KBR31 encourages vehicle-free development and the Forum wishes to note that, in its reps to the New London Plan consultation, it has provided strong support for the proposal to require development to be vehicle-free in the CAZ as a strategic policy.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			meet the Basic Condition of contributing to the achievement of sustainable development, motor vehicle-free development should be a requirement rather than an encouragement (again with the exception of Blue Badge).	
74.	KNP49	Westminster Cycling Campaign	We respect the effort put into Neighbourhood Plans by Neighbourhood Forums and we had hoped that this new local level would move policy forward. In this case we are surprised and disappointed that the Knightsbridge Neighbourhood Plan appears regressive, including in comparison with its pre-submission version. We fear that the existence of such policies in Knightsbridge would make it difficult to attract funding from bodies such as Transport for London to the local area. We challenge whether the Knightsbridge Neighbourhood Plan conforms with policy such as the London Plan and whether contributes to the achievement of sustainable development.	<p>The Forum has been ambitious in its transport policies from the outset to create a sustainable community, but the KNP cannot go beyond what a neighbourhood plan may do. The Forum believes that the reference the Westminster Cycling Campaign is making to regression from the Pre-Submission Version of the KNP refers to the fact that a number of schemes which were included in Policy KBR36 in the Regulation 14 version of the KNP have now been removed from the policy. This was done following representations made by other parties, including WCC who stated that it was only suitable to identify such schemes in an appendix. Therefore these schemes have been retained in the KNP and moved to Appendix D was in a previous version of policy (Reg 14, Policy KBR36). This now forms part of a simplified suite of travel policies which addressed reps made at Reg 14 stage that there was duplication across the travel policies.</p> <p>It should be noted that, in its reps to the Reg 14 consultation, the Westminster Cycling Campaign supported reference being made to certain cycling schemes. Whilst these schemes are no longer in the policy wording itself, they remain as identified schemes in the KNP in Appendix D.</p>
75.	KNP52	Clean Air in London	Supporting approach to sustainability e.g. SDGs.	Forum notes support. No change to KNP.

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			<p>KBR32: Provides expert advice supporting Plan.</p> <p>KBR34: Provides expert advice supporting Plan.</p> <p>KBR35: Provides expert advice supporting Plan.</p> <p>KBR36: Provides expert advice supporting Plan.</p> <p>KBR41: Level 1-3 development should obtain BREEAM 'outstanding' rating and include WELL Building Standard Gold or Platinum Certification.</p>	<p>Forum notes support. No change to KNP.</p> <p>Forum proposes amending paragraph 10.28 to read: <i>"10.28 ...the best international standards <u>such as the WELL Building Standard.</u>"</i></p>
76.	KNP54	V Clyde	Asks the Forum to fix numerous problems outside the neighbourhood area.	This is not within the remit of the KNP.
77.	KNP56	The Royal Parks	<p>KBR13: Do not want policy to impinge on their ability to enhance or replace existing buildings for the benefits of park visitors and to achieve their charitable objectives.</p> <p>Paragraph 6.5: The Albert Memorial is located within Kensington Gardens. Please note that the gates to Kensington Gardens are locked at dusk and consequently are not accessible during the hours of darkness.</p> <p>KBR27: Any improvements to the public realm to better provide links between the Memorial and the Albert Hall would need to</p>	<p>The Forum considers that the KNP guides sustainable development in a manner unlikely to conflict with the aims of The Royal Parks. No change to KNP.</p> <p>Noted. It is outside the neighbourhood area.</p> <p>Agreed. No change to KNP.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>be respectful of the Albert Memorial's Grade 1 listed status and its setting within Kensington Gardens, a grade 1 listed landscape.</p> <p>KBR39: Support comments by FHPKG on tree management</p>	Noted. Addressed in Entry 59.
78.	KNP57	Knightsbridge Residents Management Company	<p>KBR7: Need appropriate height, bulk and massing.</p> <p>Supports provisions around public realm and pedestrian movement.</p> <p>KBR11: Greening should be integral to developments.</p> <p>KBR13: Supports analysis of LUC report.</p> <p>KBR14: Supports policy. Planning brief should address current residential amenity.</p> <p>Support KBR15, KBR16 and KBR19.</p> <p>KBR23: Exclude noisy Saturday working.</p> <p>KBR32: Support the policy.</p> <p>Fully support policies towards Objective 10.</p> <p>Support other Plan documents.</p>	<p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum agrees. Addressed in Entry 19.</p> <p>Forum notes support and proposes Planning brief.</p> <p>Forum notes support. No change to KNP.</p> <p>Noted. Proposed already in Appendix C in C5.1.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p>
79.	KNP63	Bluepoint	KBR32 says that developments (Level 1 to 3) should be equipped with "two-hour or faster	The Forum agrees with this and proposes the following amendment to KBR32(A):

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			<p>electric vehicle charging points". We welcome a mixed charging solution and Source London is made up of a range of charge points. However, the majority of our charge points are 7kW which fully charge a car in 4 hours. We believe that a dense on-street network of 7kW charge points is key to encouraging the uptake of EVs. They are easy to install, put less of a strain on the national grid and do not aggressively wear the battery out in an EV. We believe, however, that there is a place for faster charge points for specific uses such as taxi fleets. Bluepointlondon are currently rolling-out a series of 22kW charge points in certain locations around London. In addition, we have announced a partnership with another EV charge point provider, CPS, who will incorporate 50kW charge points which will encourage more Londoner's to switch to EV.</p>	<p><i>"Any new charging facilities should provide parking spaces with future-proofed fourtwo-hour or faster electric vehicle charging points (or wireless charging facilities) that are affordable, reliable and open access."</i></p> <p>The Forum also proposes the following amendment to the definition of 'Electric car charging' in the Glossary: <i>"Electric car charging - dedicated charging points for electric vehicles. At present, these are classified by the Knightsbridge Neighbourhood Forum as slow, fast or rapid charging to provide a substantial charging of a vehicle within sixfour hours, fourtwo hours or 30 minutes respectively."</i></p> <p>The following amendments would also need to be made to the Part Three document: <i>"7.26 Development should provide the facilities to enable the residents, workers and visitors to the area to use electric motor vehicles by installing charging points. Any new charging facilities should provide parking spaces for residents and 'car-club' spaces with future-proofed fourtwo-hour or faster electric vehicle charging points (or wireless charging facilities)..."</i> <i>"7.30 ... unsustainable adding to congestion and pollution. FourTwo hour or faster charging points are needed for car club spaces to provide a zero tailpipe emission alternative to private car use."</i></p> <p>The following amendments would also need to be made to the Part Two document: - Action no. 64: <i>"Implement and future proof 'fourtwo-hour or faster' electric charging points in all ResPark bays."</i></p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
				- Action no. 65: "Implement ' two four hours or faster' electric charging in all 'car club' and pay parking bays."
80.	KNP64	DIO	<p>As drafted, many policies within the Plan fail to contribute to sustainable development, providing additional levels of detail to strategic policies undermining, those policies by imposing onerous conditions that would undermine the delivery of development. We also consider that there is a lack of conformity with the strategic policies of the development plan, namely the objectives set at a strategic level by the London Plan (2016) and the City Plan (2016) at Page 21 – 22 which includes, inter alia:</p> <ul style="list-style-type: none"> • To accommodate sustainable growth and change that will contribute to Westminster's role as the heart of a pre-eminent world class city, building on its internationally renowned business, retail, cultural, tourism and entertainment within the Central Activities Zone ... whilst maintaining its unique and historic character, mix, functions, and townscapes. • To increase the supply of good quality housing to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs; whilst ensuring that new housing in commercial areas coexists alongside 	<p>The KNP actively encourages sustainable growth, as opposed to growth at all costs, reflecting the definition of sustainable development in the NPPF which balances social, economic and environmental sustainability. It is a mistake to assume that an emphasis on growth which is compatible with a healthy environment is the same as a lack of support for development.</p> <p>The documents submitted at Reg 16 stage, including the Basic Conditions Statement, demonstrate that the KNP is in general conformity with the strategic policies. Neighbourhood Plans are not required to allocate sites for development. The City Plan has allocated development sites and the NP provides locally specific context to ensure development enhances the sustainability of Knightsbridge, economically, socially and environmentally. In Policy KBR14, the KNP provides a framework for the sustainable redevelopment of the Hyde Park Barracks site. The Forum has also suggested amendments to the policy to shape development on the site to address concerns about potential restrictions of the development on the site.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>the business activity and appropriate balance of uses is maintained.</p> <p>The Neighbourhood Plan does not allocate sites for development to support this function. The lack of support towards future development at HPB within Policy KBR14 is considered to conflict with the aspirations of strategic policies in the development plan and in addition seeks to restrict the delivery of much needed homes.</p>	
81.	KNP64	DIO	<p>The DIO are concerned with regards to the use of the test of 'tranquillity', particularly within Policies KBR13 and KBR14. 'Tranquillity' is referred to as a Strategic Objective at Objective 7 of the City Plan as follows:</p> <p>To protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day by over one million workers and visitors. This is reiterated at Policy S11 which relates to the Royal Parks which states:</p> <p>The Royal Parks, their settings, views and tranquillity will be protected from inappropriate development and activity. Developments will only be allowed where</p>	<p>The relative tranquillity of the Royal Parks performs an important function enabling local residents, and others to escape from the otherwise busy environment. Read together, Strategic Objective 7 and Policy S11 of the City Plan are clear that development should not harm the tranquillity of the Royal Parks. This must include development both outside and inside the Royal Parks. Given the nature of a Royal Park, it is highly unlikely that significant development would occur within the boundary of the park. Therefore the strategic policy is directed towards development occurring outside the Royal Park but which could have an impact on the Royal Park's tranquillity. Indeed it would be surprising for the policy to prevent harm to tranquillity within the Royal Parks, but then not to restrict development adjacent to the Royal Park which harms that tranquillity. It is considered that this interpretation by the DIO is incorrect.</p> <p>The Forum considers that tranquillity, or relative tranquillity, is an important principle. The New London Plan consultation document recognises this with the inclusion of reference in Policy D13 to 'Quiet Areas' and 'spaces of relative</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>they are essential and ancillary to maintaining or enhancing the value of the park as open space, and that do not harm the park's:</p> <ul style="list-style-type: none"> • Open landscape character; • Heritage value; • Nature conservation value; • Tranquillity; or • Value as a public open space. <p>The use 'tranquillity' in the City Plan relates exclusively to development within the Royal Parks. Figure 28 of the Westminster City Plan (Page 72) confirms that HPB does not fall with the Royal Parks or Blue Ribbon Network and Figure 46 shows that HPB is not public open space. Therefore the imposition of a test of 'tranquillity' is not supported by the development plan. No evidence is presented to justify the extension of the test of 'tranquillity' to HPB and all MOL. Therefore, all reference to 'tranquillity' should be deleted.</p>	<p>tranquillity' and the identification and nomination of these being a matter for Boroughs and 'others with relevant responsibilities' (which the Forum considers includes designated neighbourhood forums preparing neighbourhood plans).</p>
82.	KNP64	DIO	<p>KBR1(a): Draft Policy KBR1(a) fails to meet Basic Condition D and Basic Condition E that requires neighbourhood plans to contribute to sustainable development and be in general conformity with the strategic policies of the development plan for the local area. The London Plan (Policy 7.4), inter alia, requires that design has regard to pattern and grain. However, it should be noted that the London</p>	<p>The Forum considers that KBR1(a) does not deviate from strategic policy. Indeed, the amendment to the text proposed by the DIO does not materially change the intent of the policy which is to enhance character, including through including scale, orientation, height and massing.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>Plan does not limit the scale, massing and height of buildings to that of its surrounding. Rather the obligation is to make sure that new development makes a positive contribution to the character of a place. In addition, Policy S28 of the Westminster City Council City Plan states that imaginative modern architecture is encouraged provided it respects Westminster's heritage and local distinctiveness.</p> <p>As currently drafted, there is no justification for the deviation from strategic policies and would limit the scope of achieving sustainable development. In line with Policy 7.4 of the London Plan and Policy S28 of the Westminster City Council City Plan, we propose that the following amendment to KBR1(a) is made:</p> <p>The importance of making a positive contribution to the character of responding creatively to, and enhancing, the setting of the surrounding area, having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing.</p>	
83.	KNP64	DIO	<p>KBR1(b): The policy seeks to impose onerous obligations on future development, contrary to policies within the development plan and the principles of sustainable development. As such, draft Policy KBR1(b) fails to meet Basic Condition D and Basic Condition E that requires neighbourhood plans to contribute</p>	<p>The Forum agrees with this and has suggested in response to the reps on Policy KBR1 by WCC that the policy is amended.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>to sustainable development and be in general conformity with the strategic policies of the development plan for the local area.</p> <p>London Plan Policy 7.6 (c) states that new development should comprise details and materials that complement, not necessarily replicate, the local architectural character. As currently drafted, there is no justification for the deviation from strategic policies and would limit the scope of achieving sustainable development.</p> <p>Therefore, we propose that Part (b) of Policy KBR1 is redrafted as follows:</p> <p>For each of the respective Character Areas, new development should complement the local architectural character of the surrounding area. comprise materials which complement the local architectural character, showing respect in the design and choice of materials which enhances the following:</p> <ul style="list-style-type: none"> i) Area 1 ('Kensington Squares') — terraced buildings in stock brick, stucco, half stucco or stone. ii) Area 2 ('Albertopolis' 2) — buildings in red brick or terracotta, on large plots and of a large scale. iii) Area 3 ('Knightsbridge Green and Albert Gate') — red brick, large scale buildings, with Knightsbridge Green having a singular townscape 	

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			appearance and Albert Gate a mixed townscape appearance.	
84.	KNP64	DIO	<p>KBR1(c): We object to Policy KBR1(c) as the policy conflicts with Basic Condition A, Basic Condition C, Basic Condition D and Basic Condition E.</p> <p>Basic Condition C requires that the neighbourhood plans have regard to the desirability of preserving or enhancing the character or appearance of any conservation area. As drafted, Policy KBR1(c) seeks to extend the remit of the statutory requirement without justification. As a result, Policy KBR1(c) conflicts with the statutory consideration and the NPPF which requires account to be taken of the desirability of preserving and enhancing the character and appearance of a conservation area.</p> <p>Policy KBR1(c) fails to meet Basic Condition E that requires neighbourhood plans to be in general conformity with the strategic policies of the development plan for the local area. London Plan Policy 7.6 (c) states that new development should comprise details and materials that complement, not necessarily replicate, the local architectural character. There is no justification for the deviation from the development plan.</p>	<p>The Forum considers that KBR1(c) does not require development to replicate the local architectural character, rather to contribute positively to the character of the area. Respect does not require conformity nor does it prescribe a certain form of design or use of materials. It requires development to have regard to its setting and to acknowledge that it should be designed so as not to be incongruous. Such a requirement is not considered to be onerous.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>In addition, KBR1(c) we consider that proposing Character Areas to be included within this part of the policy unnecessary as they should not be afforded the same policy protection as statutorily designated conservation areas.</p> <p>The current wording of the policy therefore seeks to impose onerous obligations on future development, contrary to the principles of sustainable development and therefore fails to meet Basic Condition D.</p> <p>Therefore we propose that Part (c) of Policy KBR1 be deleted.</p>	<p>This policy seeks to ensure good design of buildings that does not harm the character of its area. The policy does not provide 'protection' to Character Areas, rather it identifies them (as encouraged by planning guidance) and requires development to show 'respect' in the design and choice of materials.</p>
85.	KNP64	DIO	<p>KBR5: We consider that as drafted Policy KBR5 conflicts with Basic Condition A, Basic Condition B, Basic Condition C, Basic Condition D and Basic Condition E which require conformity of neighbourhood plans with national and strategic policies and to contribute to achieving sustainable development.</p> <p>The view north along Montpellier Street has not been identified as being of regional or local importance within either the London Plan or Westminster City Council City Plan. We refer to Page 56 of the Knightsbridge Green and Albert Gate Conservation Area Audit which identifies important views within the conservation area. However, this</p>	<p>The view north along Montpellier Street has been identified through the development of the KNP as being of local importance. It is within the scope of a neighbourhood plan to identify local views of importance, provided they are in general conformity with strategic policies. If it was the intention of Government to not permit neighbourhood plans to address views, then this would be explicitly stated in the NPPF, national Planning Practice Guidance or a ministerial statement.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>document does not include the view north along Montpelier Street. We do not consider that neighbourhood plans should propose views, especially without justification.</p> <p>Policy S26 of the Westminster City Council states the following: The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development.</p> <p>The view is not a strategic view, as identified by the London Viewing Management Framework, nor a local view as identified by Westminster City Council.</p> <p>We consider that Policy KBR5 does not reflect the contents of the Planning (Listed Buildings and Conservation Areas) Act 1990 or Section 12 of the NPPF that seek development to preserve or enhance the setting of conservation areas and listed buildings. It is noted that KBR5 seeks to restrict the quantum of development within the view north along Montpellier Street and therefore consider that the policy as drafted seeks to restrict achieving sustainable development. Any development north along Montpellier Street would be required by law to preserve</p>	

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>or enhance the conservation area and listed buildings and therefore is already afforded protection.</p> <p>To conclude, Policy KBR5 should be deleted.</p>	
86.	KNP64	DIO	<p>KBR7(a): We object to Policy KBR7(a) as the policy seeks to be overly restrictive and fails to secure the opportunity for the delivery of sustainable development in line with the adopted development plan. Therefore, Policy KBR7(A) not comply with Basic Condition D, which requires a neighbourhood plan to contribute to the achievement of sustainable development, and Basic Condition E, which requires a neighbourhood plan to be in general conformity with strategic polices contained in the development plan.</p> <p>London Plan Policy 7.7 states that tall and large buildings should generally be limited to sites within the CAZ, Opportunity Areas, areas of intensification or town centres that have good access to public transport. The neighbourhood area benefits from the above site specific designations and therefore the principle of tall buildings is acceptable. It is acknowledged that Westminster City Council consider there is limited opportunities for tall buildings. However, Policy S4 notes that tall buildings may be acceptable in a limited number of suitable locations where the council</p>	<p>Tall buildings have the potential to adversely impact the Neighbourhood area in a number of ways. The London Plan states that it is for the Local Plan to identify suitable sites which are and are not appropriate for tall buildings, having regard to local sensitivities. The London Plan does not provide blanket support for tall buildings in the CAZ, but states that they are more likely to be acceptable in such areas, subject to consideration of sensitive sites such as conservation areas, listed buildings, MOL and registered historic parks and gardens, all of which are present in or adjacent to the Neighbourhood Area. The London Plan therefore supports identifying such an area as generally inappropriate for tall buildings. Further, given the City Plan identifies Westminster, as a whole, as unsuitable for tall buildings, the City Plan cannot be used to support the principle that development of tall buildings in Westminster's CAZ is supported. In any event, policy KBR7 does not 'preclude' the development of tall buildings. It recognises the fact that the City Plan considers Westminster, on the whole, to be an unsuitable location for tall buildings. The harm to the neighbourhood that tall buildings can cause was identified through the development of the KNP and the policy is considered appropriate in the circumstances. This approach was supported by Historic England in its letter to the Forum dated 6 October 2017 (submitted by the Forum at Regulation 16 stage) (KNF58).</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>considers that they will not seriously harm the surrounding area and its heritage assets. Therefore, when tested against the London Plan and Westminster City Council policy, tall buildings should not be precluded within the neighbourhood area. Excluding tall buildings from the neighbourhood plan area therefore inhibits the ability for development be brought forward in line with the statutory development plan and therefore does not facilitate the delivery of sustainable development.</p> <p>We recommend that the policy is redrafted as follows: Tall buildings within the Knightsbridge Neighbourhood Plan Area may be acceptable in locations where they do not cause substantial harm to the surrounding area or its heritage. Knightsbridge is generally not an appropriate location for tall buildings. These are defined as buildings that are significantly taller than their surroundings.</p>	
87.	KNP64	DIO	KBR7(b): We object to Part B of Policy KBR7. As drafted, the Policy KBR7(B) conflicts with Basic Condition A, Basic Condition C and Basic Condition D.	As noted above, the policy recognises the fact that the City Plan considers Westminster, on the whole, to be an unsuitable location for tall buildings. As noted in the Part 3 document paragraph 1.37, this is because of the potential damage to character, local distinctiveness (including heritage) and important views.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>Part B of Policy KBR7 does not define <u>adverse impact</u>. Further, it does not acknowledge the statutory tests for harm set out within the NPPF. Therefore, this policy seeks to enhance the statutory protection afforded by national, regional and local planning policy in respect of seeking to preserve and enhance the character and appearance of conservation areas and preserving listed buildings.</p> <p>In addition, Policy KBR7 seeks to exclude tall buildings contrary to London Plan Policy 7.7(E). London Plan Policy 7.7(E) notes that tall building within sensitive locations should have regard to the surrounding context. As prepared, Policy KBR7(B) does not clarify 'adverse impact' and as such conflicts with the national, regional and local policy. Therefore, we consider that further detail is required within the policy to define adverse or propose its removal and replacement with wording commensurate to the aspirations of national, regional and local planning policies. In addition, as noted above we consider that the view north along Montpellier Street should be deleted. Therefore the reference at (e) should also be deleted.</p> <p>To conclude, we propose the following amendments to KBR7(B) (where additions to text are shown in italics):</p>	<p>The use of the term 'adverse impact' is common in planning and the judgement rests with the decision maker. The policy establishes which particular issues could result in adverse impact therefore are seeking to provide clear guidance to an applicant. Further, the NPPF does not set out any statutory test, but rather, it is policy which seeks to identify scales of harm that may be caused to heritage assets and particular approaches to be taken in considering that harm. The statutory tests in the Planning (Listed Buildings and Conservation Areas) Act 1990 do not provide any guidance to the decision maker as to how to differentiate impacts on designated heritage assets, but rather place a specific duty to consider the desirability of preserving listed buildings, their setting or features of special architectural or historic interest (s66(1)) or the desirability of preserving or enhancing the character or appearance of a conservation area (s72(1)).</p> <p>The proposed amendments to KBR7(B) do not materially change or add to the policy and its intention. Moreover, the proposed wording does not make sense - 'In recognition of the sensitivity of the historic and lower-scale residential</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>In recognition of the sensitivity of the historic and lower-scale residential environment of Knightsbridge, tall buildings, including the alteration of existing tall buildings, will not be permitted in the Knightsbridge Neighbourhood Area where they would have an adverse impact upon any of the following should have regard to the following:</p> <p>a) <i>preserving and enhancing</i> the Royal Albert Hall or the Hyde Park or Kensington Gardens registered parks and gardens and or their setting;</p> <p>b) preserving other heritage assets including listed buildings or local buildings or structures of merit and or their setting;</p> <p>c) <i>preserving and enhancing</i> the character and appearance of the Albert Gate, Knightsbridge, Knightsbridge Green or Royal Parks Conservation Areas;</p> <p>d) <i>the impact on</i> significant or important views, both strategic and local, including townscape views and historic skyline features;</p> <p>e) the view north along Montpelier Street (identified in Policy KBR5); or</p> <p>f) the setting or openness of open spaces including Local Green Spaces or Metropolitan Open Land.</p> <p>Any exceptions to this policy must comply fully with the tests in the NPPF in relation to</p>	<p>environment of Knightsbridge, tall buildings, including the alteration of existing tall buildings, will not be permitted in the Knightsbridge Neighbourhood Area where they would have an adverse impact upon any of the following should have regard to the following:...</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			the conservation and enhancement of the historic environment.	
88.	KNP64	DIO	<p>KBR7(c): We raise concerns in respect of Policy C(a) of Policy KBR7. Part C (a) of Policy KBR7 is not accurate and does not define adverse impact, contrary to the requirements of Basic Condition A and seeks greater detail than that imposed by the development plan, contrary to the requirements of Basic Condition E.</p> <p>The London Plan notes at Policy 7.7 that tall buildings 'should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunications interference'.</p> <p>We consider that Part C(a) should be updated to be more specific and in accordance with London Plan Policy 7.7 as follows: Development proposals for tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise and solar glare. In addition, tall buildings should seek to enhance the quality of the public realm at ground level. We consider that Part (d) should be deleted as the impact of tall buildings on heritage</p>	<p>The Forum considers that the use of the term 'adverse impact' is common in planning and the judgement rests with the decision maker. It would be overly prescriptive to identify each potential adverse impact which could include harm to heritage assets, overshadowing, traffic impacts amongst others. The policy establishes which particular issues could rest in adverse impact therefore are seeking to provide clear guidance to an applicant.</p> <p>The suggested amendment to KBR7(C)(a) by the DIO is considered unnecessary because it would repeat Policy 7.7 of the London Plan which is cited in the conformity reference underneath the policy.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			assets is controlled through national planning policies and policies within the existing development plan.	
89.	KNP64	DIO	<p>KBR13: A large part of the neighbourhood area's Metropolitan Open Land (MOL) constitutes the HPB site. However, the KNP does not distinguish between the previously developed land at HPB and the open space, allocated as MOL, to the east of HPB.</p> <p>Policy KBR13 seeks to extend the scope of London Plan Policy 7.17 (Metropolitan Open Land) which sets out the Greater London Authority's (GLA) position in relation to development on MOL. Policy 7.17 notes that 'The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as the Green Belt'. The supporting text at Paragraph 7.56 of the London Plan refers to the policy guidance within Paragraphs 79 – 92 of the NPPF, noting that the policies in relation to the Green Belt apply equally to MOL.</p> <p>The NPPF notes that inappropriate development is harmful to the Green Belt and should not be approved, except in the following instances:</p> <ul style="list-style-type: none"> • buildings for agriculture and forestry; • provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the 	The Forum notes this point but considers any amendment or addition to the policy to be unnecessary. The policy should be read alongside the other parts of the development plan and national planning policy and guidance. To repeat this in the policy is considered unnecessary.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>openness of the Green Belt and does not conflict with the purposes of including land within it;</p> <ul style="list-style-type: none"> • the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; • the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; • limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or • limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. <p>As drafted, there is no reference to the exceptions permitted at Paragraph 89. Therefore KBR13 fails to be in compliance with Basic Condition A and Basic Condition E</p>	
90.	KNP64	DIO	KBR13(A): We object to Policy KBR13(A). As drafted Policy KBR13(A) conflicts with Basic Condition A, Basic Condition D and Basic Condition E.	See response above to Entry 89.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>It is noted that the strongest protection should be given to Metropolitan Open Land and inappropriate development should be refused (London Plan Policy 7.17). In addition, there is no reference to development which is considered acceptable within Metropolitan Open Land, as set out within Paragraph 89 of the NPPF.</p> <p>In addition, Policy KBR13 deals with Metropolitan Open Land and should not refer to the assets. Therefore, the following text should be deleted from Part A: 'which forms a setting to the adjacent Conservation Areas and Royal Parks'. The impact of development on the Conservation Area is subject to different statutory and policy tests and is dealt with in Policy KBR1 of this Plan.</p> <p>As noted above, there is no reference to the instances when development is considered acceptable in Metropolitan Open Land; specifically the redevelopment of previously developed land. Policy KBR13(A) does not differentiate between the barracks site, which comprises the majority of the Knightsbridge Neighbourhood Plan area's Metropolitan Open Land, and open space land to the west of the barracks site.</p> <p>Furthermore, Policy KBR13(A) seeks to provide additional detail to London Plan</p>	<p>The suggested amendment is not considered to be necessary. The text states a fact and therefore provides important context.</p> <p>It is not appropriate to refer to specific parts of the MOL. The policy relates to all MOL in, or having an impact on, the Neighbourhood Area.</p> <p>The Forum does not accept this amendment to KBR13(A). It is not considered that the policy is adding detail to the London Plan policy, rather it is identifying the matters of</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>policy for Metropolitan Open Land, which it is not appropriate for a neighbourhood plan to do.</p> <p>Therefore, the following amendments are proposed: The character and function of the Metropolitan Open land will be <i>protected from inappropriate development</i> protected and enhanced, including views, tranquility, its openness, nature conservation value and historic parkland features, which forms a setting to the adjacent Conservation Areas and Royal Parks. Construction of new buildings should be considered inappropriate unless:</p> <ul style="list-style-type: none"> • the buildings proposed are for agriculture and forestry; • the development provides appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it; • the proposals seeks extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; <p>the replacement of a building, provided the new building is in the same use and</p>	<p>importance when considering development and the MOL. It is also considered unnecessary to add in the full wording of national policy. The proposed amendments to KBR13(A) and (B) are considered to address the points raised where relevant.</p> <p>There was support given to Policy KBR13 at Reg 16 stage by the Royal Parks (56), the Friends of Hyde Park and Kensington Gardens (20), the Royal Commission for the Exhibition of 1851 (44) and the London Parks and Gardens Trust (21).</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>not materially larger than the one it replaces;</p> <ul style="list-style-type: none"> • limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or • limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. 	
91.	KNP64	DIO	<p>KBR13(D): We object to Policy KBR13(D) as drafted as there is no evidence to justify the policy and therefore it is not in compliance with Basic Condition A.</p> <p>We provide comments for the component parts of the Policy KBR13(D) below:</p> <p>a) There is no evidence to support the policy. This should be deleted.</p> <p>b) There is no transport evidence to justify the requirement for development proposals to provide connectivity for pedestrians. With particular reference to Hyde Park Barracks, the site is impermeable and therefore there is no permeability. Therefore, as noted within NPPF Paragraph 89, infilling, partial or</p>	<p>The Forum disagrees and the individual points are addressed below.</p> <p>a) The evidence to support the policy is provided in the Part 3 document, paras 3.10 to 3.23.</p> <p>b) The site may be impermeable at present (although evidence is provided by the DIO to justify this statement) but redevelopment of the site could create the opportunities to open up pedestrian routes. The policy encourages the development of sites such as the Hyde Parks Barracks site to explore these opportunities.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>complete redevelopment of previously developed sites is acceptable in instances where the proposals would not have a greater impact on openness and the purpose of including land within it than the existing development. There is no obligation to increase permeability.</p> <p>c) This sub-section of Policy KBR13(D) is inaccurate as there are no trees to the south of South Carriage Drive. This should be deleted.</p> <p>d) London Plan Policy 7.6(c) states that new development should comprise details and materials that complement, not necessarily replicate, the local architectural character. In addition, it should be noted that planning policy does not preclude tall buildings from Metropolitan Open Land. Proposed alterations to KBR13 (A) result in Part (D)(d) being no longer required. In addition, materials and design are dealt with at Policy KBR1. Therefore Part (d) of Policy KBR13(D) should be deleted.</p> <p>Policy KBR13(D) is not supported by evidence to justify the limitations on development and therefore is contrary to Basic Condition E and Basic Condition D which require a neighbourhood plan to comply with the local development plan and to contribute to the</p>	<p>c) This is incorrect. There are trees in this location to both the left and right of the Hyde Park Barracks site.</p> <p>d) KBR13(D)(d) does not require development to replicate architectural character but to maintain consistency with the character. Regarding tall buildings, the policy wording reiterates an important principle which has been established for Knightsbridge. Therefore, whilst planning policy does not preclude tall buildings from MOL, the MOL which forms part of the Knightsbridge Neighbourhood Area is informed by the low prevailing height of existing buildings. To improve the policy, it is proposed that the following amendment is made to KBR13(D)(d):</p> <p><i>"d. maintain consistency with respect the character of the surrounding area in terms of height, bulk and massing, materiality and character of the urban edge that forms a setting to the MOL and the Royal Parks. The MOL in the Knightsbridge Neighbourhood Area is not an appropriate location for new tall buildings, defined as buildings that are significantly taller than their surroundings."</i></p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>achievement of sustainable development. However, as drafted, KBR13(D) seeks to limit the ability of policy to achieve sustainable development; contrary to the adopted development plan.</p> <p>The amendments to Policy KBR13(A) result in there being no requirement for Policy KBR13(D). Therefore, we consider that Policy KBR13(D) should be deleted.</p>	
92.	KNP64	DIO	<p>KBR14: The strategic policy for HPB is set out at Site Allocation G3 which seeks the change of use of the barracks for c. 100 units. We note that failure to deliver these units would have an impact on WCC's ability to meet its housing need as defined by the London Plan and within the City Plan.</p> <p>Development opportunities are under review by the DIO and it is considered that proposed policy KBR14, as drafted, is particularly onerous and does not comply with the principles of sustainable development, as it would restrict the use of the site.</p> <p>Detailed comments on KBR14 can be found at Appendix 1 and revised policy wording can be found at Appendix 3.</p> <p>We note that some of the criteria set out within the Policy KBR14 is not supported by evidence and therefore seeks to introduce additional parameters of site specific policy without evidence; further contributing to limiting the scope of development.</p>	<p>The development of the Hyde Parks Barracks represents a significant development opportunity in the Neighbourhood and the KNP seeks to ensure that a high quality sustainable development comes forward and that opportunities to improve the neighbourhood generally as a result of any development on the site are achieved. Further, the KNP is designed to ensure that the development of the site does not harm the neighbourhood area. The Forum addresses individual points detail below. The evidence supporting the policy is provided in the Part Three document.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			The proposed approach of a planning brief at HPB to inform future redevelopment is supported. This should be agreed between WCC and the developer/landowner in accordance with normal procedures.	
93.	KNP64	DIO	<p>KBR14(A): To ensure compliance with Basic Condition E, Policy KBR14(A) should be updated to refer to site allocation policy G3 of the Local Plan in respect of the minimum quantum of development at Hyde Park Barracks.</p> <p>In addition, reference to 'tranquillity of open spaces' should be deleted as there is no justification for its conclusion.</p> <p>We propose that KBR14(A) should be incorporated into KBR14(C) and therefore KBR14(A) should be deleted.</p>	<p>The Forum considers that specific reference to this is not necessary. KBR14 should be read alongside the relevant policies of the City Plan and the London Plan.</p> <p>The Forum has provided its response on matters relating to tranquillity in its response to the WCC reps on KBR14.</p> <p>The Forum does not consider that amalgamating Criteria (A) and (C) would materially add to the policy and would make the policy less clear.</p>
94.	KNP64	DIO	<p>KBR14(B): We object to the inclusion of Policy KBR14(B) as it seeks to inhibit the delivery of development at the barracks, contrary to Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>Neighbourhood plans are required to have regard to national policy. The NPPF notes that planning policies and decision should encourage the effective use of land by reusing land which has been previously developed provided that it is not of high environmental value (Paragraph 111). Whilst</p>	<p>The Forum proposes the following amendment to Policy KBR14(B): <i>"The retention of the barracks use on the whole or part of the site is supported, as is reversion of all or part of the site to parkland.</i></p> <p>The exception referred to is a qualified exception which requires the decision maker to consider the impacts that the redevelopment would have on the openness of the MOL. It is not possible to assess the impacts of any future development on the openness of the MOL until any future scheme has been designed and it is inappropriate to fetter the decision maker's judgement as the DIO suggests.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>Hyde Park Barracks is located within Metropolitan Open Land, the site satisfies the exemptions for development set out at Paragraph 89.</p> <p>In addition, we refer to Paragraph 22 of the NPPF which notes that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. As identified within the covering letter, the purpose of Project ROSE is to consolidate the Estate and therefore, Hyde Park Barracks is under review.</p> <p>Policy KBR14(B) conflicts with the Site Allocation G3 set out within Westminster City Council's City Plan and therefore is not relevant to be included as this fails to acknowledge the acceptability of the site for reuse for a different purpose.</p> <p>KBR14(B) seeks to restrict development at Hyde Park Barracks, and therefore seeks to inhibit the sustainable development of the site and therefore Policy KBR14(B) does not meet Basic Condition D.</p> <p>We consider that Policy KBR14(B) should be deleted.</p>	<p>WCC has confirmed that the site is classed as a Sui Generis therefore is not classed as an employment use so cannot be considered to have been allocated as such. Further, the site has been allocated as a strategic housing site in the City Plan and so is not allocated for employment use.</p> <p>An amendment to KBR14(B) has been proposed above.</p>
95.	KNP64	DIO	KBR14(C): We object to KBR14(C) as the policy does not reflect national planning	Not all strategic housing sites should automatically be considered appropriate for mixed use development. Each site should be considered on its merits and within the

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>policy or policies set out within the Local Plan.</p> <p>Part C seeks to restrict the types of uses. This contradicts the principles of sustainable development and the core planning principles within the NPPF (Paragraph 17) which supports the promotion of mixed use developments.</p> <p>It should be noted that, given the accessibility and location within the Core Activities Zone, the site is suitable for a variety of uses as set out within the London Plan and the Westminster City Plan. Therefore as drafted, Policy KBR14(C) conflicts with the development plan and fails to support the principles of sustainable development, contrary to Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>We propose that Policy KBR14(C) is redrafted to reflect the core planning principles of the NPPF to deliver mixed use developments through an acceptance at Part C that development could be brought forward for residential led mixed use development.</p> <p>Amended wording is set out below: Redevelopment of the Hyde Parks Barracks site, unless for military function, should provide a mixture of uses, within a residential</p>	<p>context of the surrounding uses and environment. As is made clear on numerous occasions throughout the KNP and its supporting evidence base, there is a delicate balance of uses in Knightsbridge and if the Area is to prosper and to achieve its vision of being the best residential and cultural place in London in which to live, work, study and visit, then one of its biggest challenges is to address the developing monoculture of cafes and 'anywhere' town centre uses. These types of uses are becoming increasingly prevalent and are threatening Knightsbridge's unique role in the CAZ and through the presence of the International Shopping Centre. To further encourage more of these uses in other areas – in this case, at the Barracks site – would be to further compromise the realisation of the vision. The site as allocated will address wider strategic objectives as well as local housing objectives and this should be its focus. The Forum does not consider that any amendment to KBR14(C) is necessary.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			led mixed use development providing a minimum of 100 new homes and complementary town centre uses (as defined by the NPPF).	
96.	KNP64	DIO	<p>KBR14(D): We object to Policy KBR14(D) as the policy seeks to impose onerous conditions on the development of the Hyde Park Barracks site which conflict with the policies set out within the development plan. Policy KBR14(D) as currently drafted conflicts with Basic Condition A, Basic Condition D and Basic Condition E.</p> <p>Part (a) of KBR14(D) conflicts with the London Plan (Policy 7.4) which, inter alia, requires that design has regard to the pattern and grain of the surrounding area. However, it should be noted that the London Plan does not limit the scale, massing and height of buildings to that of its surroundings. Rather the obligation is to make sure that new development makes a positive contribution to the character of a place.</p> <p>In addition, Policy S28 of the Local Plan states that imaginative modern architecture is encouraged provided it respects Westminster's heritage and local distinctiveness.</p> <p>In respect of KBR14(D)(b), there is no evidence to support a policy requiring</p>	<p>Each of the criteria in KBR14(D) represent realistic expectations for a strategic site to deliver to improve the sustainability of the area. In this case, this relates to:</p> <p>a. development which is not out of scale with the area in which it sits and which reflects the character of an area of significant heritage and environmental value. However, to provide flexibility, it is suggested that KBR14(D)(a) should be amended as follows: <i>"a. The height, bulk and massing of any proposals should reflect respect the scale and character of the local built environment,..."</i></p> <p>b. An opportunity to improve the currently limited access between the Knightsbridge Area and Hyde Park/Kensington Gardens. The importance of active travel and walking in particular is made clear in the London Plan and emphasised to an even greater degree in the New London Plan consultation document. To practically achieve this, opportunities need to be taken to improve pedestrian routes, particularly where these link people to green spaces and routes through major green areas such as Hyde Park/Kensington Gardens. The development of strategic sites, and the Hyde Park Barracks in particular, represent the best of such opportunities.</p> <p>c. Alongside the limited access to Hyde Park/Kensington Gardens is the consideration that residents of new strategic housing schemes should be afforded good access to green space outside their homes, where there</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>permanent pedestrian access through Hyde Park Barracks. Any redevelopment proposals would have to meet the requirements for development within Metropolitan Open Land (Paragraph 89 of the NPPF). Paragraph 89 provides that the redevelopment of previously developed sites, which do not have a greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development, should not be considered inappropriate.</p> <p>Therefore, given the site is currently impermeable and not open; there would be no requirement for this should the site be redeveloped.</p> <p>Policy KBR(D)(c) is not justified. The area is not within an area of open space deficiency and therefore there is no requirement for development proposals at the site to provide open space.</p> <p>On the basis of the above, we provide amended wording below: Development proposals on the site (including refurbishment, demolition and either partial or full redevelopment and subterranean development) should have regard to must be justified against the following criteria: a) The pattern and grain of the surrounding area.</p>	<p>is the clear opportunity to provide this, such as on strategic sites.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>b) Maintain neighbouring residential amenity.</p> <p>c) Preserving and enhancing designated heritage assets.</p> <p>d) Openness of Metropolitan Open Space.</p> <p>e) An appropriate provision of semi-public open space.</p> <p>a) The height, bulk and massing of any proposals should reflect the scale and character of the local built environment, in consideration of identified views (including those from Hyde Park and Kensington Gardens). It should maintain and enhance neighbouring residential amenity and all other relevant material considerations. The site is not an appropriate location for new tall buildings, and development should not exceed the existing built footprint and maintain existing separation distances between buildings.</p> <p>b) Development must provide permanent public pedestrian routes through the Hyde Park Barracks land, creating permeability within the site in a north-south direction and enhancing views through the MOL to Hyde Park. c) Development should include the provision of publicly accessible open and green space as part of comprehensive landscaping proposals to enhance the local environment, including tree planting and appropriate softening of the edge of the site,</p>	

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			to enhance the openness of the wider MOL designation.	
97.	KNP64	DIO	<p>KBR14(G): We object to Policy KBR14 as there is no evidence to support the policy and therefore is not in compliance with Basic Condition A.</p> <p>It is noted that the taxi and minicab operations are regulated by the GLA and not the local planning authority or a neighbourhood forum.</p> <p>In addition, there would be no mechanism to restrict drop-off and collection without an amended traffic regulation order as a condition would not be enforceable. Accordingly, the policy fails the tests set out at Paragraph 206 of the NPPF.</p> <p>Therefore Part G should be deleted.</p>	The Forum notes this and in response to Reg 16 reps made by WCC on KBR14(G), has proposed amendments regarding drop-off and collection (Entry 19).
98.	KNP64	DIO	<p>KBR14(H): We object to KBR14(H). As drafted Policy KBR14(H) conflicts with the London Plan and Policy KBR31(A) of the Neighbourhood Plan.</p> <p>We propose the following amendments: Any residential car parking must be provided on-site and off street, within buildings within the site. Parking proposed for residential use should aim for significantly less than one space per unit. Electric vehicle charging, as required by the London Plan should be</p>	<p>The Forum disagrees. The current wording 'encourages' rather than 'requires', a position which is in line with the adopted London Plan and recognises the direction of travel of the emerging London Plan consultation document. In response to Reg 16 representations by TfL (13), the GLA (99) and the Westminster Cycling Campaign (49), the following amendments to KBR14(H) have been proposed: <i>"H. Rresidential development on the site is encouraged to be car-free, with the exception of Blue Badge holders. Any residential car parking must be provided on-site and off street, within buildings within the site. Parking proposed for residential use should aim for significantly less than one</i></p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			provided. provision above London Plan requirements is encouraged.	<p>space per unit. Any E<u>electric vehicle charging provision is encouraged to exceed</u>above London Plan requirements is encouraged.</p> <p>This proposed revision to the wording encourages – rather than requires – a position which is in line with the emerging London Plan consultation document.</p>
99.	KNP64	DIO	<p>KBR14: Paragraph 3.16 of the KNP sets out a requirement for a planning brief or development framework to be prepared and adopted by Westminster City Council prior to development proposals being submitted by an applicant. We consider that the content of Paragraph 3.16 should be included within Policy 3.16 rather than in the supporting text. The planning brief should be agreed between WCC and the landowner/ developer.</p> <p>Policy KBR14 should have a new 1st paragraph: Development at the Hyde Park Barracks site should be informed by a planning brief which is to be agreed with Westminster City Council and the developer/landowner.</p>	It is for WCC as planning authority to determine the most appropriate approach. Therefore to include this in policy would not be appropriate.
100.	KNP64	DIO	<p>KBR31(A): We object to Policy KBR31(A). As currently drafted, Policy KBR31(A) conflicts with the London Plan parking standards. Therefore is not compliant with Basic Condition E.</p> <p>The London Plan seeks to reduce the reliance on motor vehicles in areas of high public</p>	<p>The Forum is not clear on the DIO's position in this rep. It both states that the policy as worded does not meet the Basic Conditions and then proposes wording which expands the coverage of the policy beyond just larger developments. This proposed amendment is not considered necessary, although the Forum does not object to the proposed deletion if the Examiner considers it appropriate. Moreover, KBR31(A) encourages, rather than requires, development to</p>

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			<p>transport accessibility, and in these instances support car free developments.</p> <p>We consider that in light of the above, Policy KBR31(A) should adopt a similar presumption in reducing the reliance on motor vehicles and be updated as follows:</p> <p>In line with the London Plan Policy 6.13, all new development, and particularly that of Level 3 or larger (as described in Appendix G), is encouraged to be motor vehicle-free with the exception of designated parking for Blue Badge holders.</p>	<p>be motor-vehicle free. This is an approach which is consistent with the emerging London Plan consultation document.</p>
101.	KNP65	John Cox	<p>Lack of selectivity risks diverting attention.</p> <p>Request to integrate building regulations and party wall agreements in the Plan.</p> <p>Questions role of neighbourhood planning.</p> <p>Review future of the Forum</p>	<p>Plan addresses issues raised during consultation.</p> <p>Subject to separate legislation.</p> <p>Forum's role supported widely in consultation.</p> <p>Forum disagrees. This is an automatic action after five years i.e. 2020. No change to KNP</p>
102.	KNP73	Exhibition Road Cultural Group	<p>KBR1: Some buildings in Albertopolis Character Area do not have a terracotta façade.</p> <p>KBR24: Welcome the aspiration to encourage development that supports needs of local workers, alongside other housing priorities.</p> <p>KBR26: Welcomes this policy.</p> <p>KBR27: Welcomes this policy.</p>	<p>Forum agrees. Addressed in Entry 7.</p> <p>Forum notes support. No change to KMP.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			Part Two: Helpful starting point for longer-term discussion about the management of the area.	Forum notes support. No change to KNP.
103.	KNP76	Camfil	KBR35: Use full titles of the international standards: BS EN 16798-3:2017 BS CEN ISO 16890:2016 BS CEN ISO 10121-2:2013	Forum agrees. Amend third sentence in paragraph 10.7: <i>"...Appropriate standards for the selection of energy efficient air filters to demonstrate compliance with design standards in Policy KBR35(F) include BS EN 16798-3:2017 (for minimum air filtration efficiency), BS CEN ISO 16890-1:2016 (for particulate matter) including PM₁ and BS CEN ISO 10121-2:2013 (for gases)."</i>
104.	KNP77	Thames Water	KBR25: Thames Water advises that proposals to increase the number of dwellings should be accompanied by the retrofitting of sustainable drainage measures to the property in order to ensure that there is a net reduction in peak flows to the sewerage network. Developers are advised to contact Thames Water at an early stage to discuss water and sewerage infrastructure requirements.	Forum agrees. Addressed in Entry 28.
105.	KNP81	EIC	Support for KBR35 and KBR36. Appendix C: Local authorities should look to <u>exceed</u> GLA's standards for NRMM. Urge Plan to make sure that Transport Refrigeration Units use zero emission alternatives to reduce toxic emissions.	Forum notes support. No change to KNP. Forum considers the point is addressed already in paragraph C4.1 in "or better" and "or exceed". Forum acknowledges the concern. It might be addressed in future revisions to KBR31 or as a possible 'action' in Part Two.
106.	KNP84	Chelsfield	Developer support for Plan including KBR2, KBR8, KBR10, KBR37 and KBR41.	Forum notes support. No change to KNP.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			KBR10 A: Consider the energy efficiency of mechanical plant.	Forum agrees and suggests that the following amendment is made to Policy KBR10(A): <i>“(A)...visual and acoustic screening of an appropriate design <u>that takes account of the energy efficiency of such mechanical plant.</u>”</i>
107.	KNP88	Cundall	KBR32: Provides expert advice supporting Plan. KBR35: Provides expert advice supporting Plan. KBR36: Provides expert advice supporting Plan including TM54 in paragraph 10.14. KBR41: Explains direction of travel.	Forum notes support. No change to KNP. Forum notes support. No change to KNP. Forum notes support. No change to KNP. Forum notes that 'Part L' calculations used by BREEAM will improve over the life of the KNP. No change to KNP.
108.	KNP89	ICL	KBR7: However, while it is considered reasonable to protect the historic environment, it is not considered appropriate that this should be used to limit the aims of delivering sustainable development. Instead Westminster City Council and this policy should optimise the development potential of previously developed land, while balancing the benefits of development against potential harm. It is suggested that tall buildings that contribute positively to the character and distinctiveness, and take opportunities to enhance the character and appearance of the Conservation Area and its setting, should be permitted.	Policy KBR7 does not 'limit' the aims of sustainable development insofar as the development of tall buildings can help to achieve this. It recognises the fact that the City Plan considers Westminster, on the whole, to be an unsuitable location for tall buildings. However, the policy allows tall buildings where the identified issues – which are those most likely to have adverse effects – are properly addressed.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>Taking the above issues into account, Imperial College London seeks to ensure that policy is effective and consistent with regional (GLA) and local (Westminster) policy, and that it does not unnecessarily restrict development (i.e. tall buildings), where it may otherwise be appropriate subject to meeting specified criteria, high quality design and the benefits outweighing any identified harm.</p> <p>It is clear from regional and local policy that the neighbourhood plan area is not an appropriate location for tall buildings (e.g. buildings over 30m). The policy should reinforce this, but also allow a level of flexibility to facilitate appropriate sustainable development. It is therefore a key issue to address in respect of the intention of the policy and in light of the sub-objective, care being needed to ensure that the policy is consistent with both the London Plan and emerging Westminster City Management Plan.</p>	
109.	KNP89	ICL	Please note that the policies map on page 77 identifies Imperial College Road as a local road (shaded light blue), when it is, in fact, a private road.	This is noted by the Forum. The proposed amendment is shown in Figures D, E and F below.
110.	KNP90	RBKC	Area of influence: Part two of the KNP, the Knightsbridge Management Plan, includes discussion of what is described as the KNP's "wider area of	The Forum notes and agrees with this. In the Part Two (Knightsbridge Management Plan) document, the following changes are proposed:

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			<p>influence.” Much of this area lies within Westminster, and as such, is of no concern to the Royal Borough. However, the “area of influence” includes a parcel of land to the south of Brompton Road - the Harrods department store. This lies within Kensington and Chelsea.</p> <p>This is of concern as paragraph 2.9 of part 2 of the KNP states that, whilst areas beyond the Neighbourhood Area boundary are not subject to the policies within the Plan, “the Forum reserves the right to comment on applications within the wider area of interest or more widely”.</p> <p>A Neighbourhood Forum, cannot claim any jurisdiction or influence over any area which does not lie within the Neighbourhood Plan area. This is undemocratic and, in all likelihood, unlawful. It is essential that the policies and contents of the Plan, and its supporting documents, relate to the defined Neighbourhood Area only.</p> <p>The Forum may wish to be consulted on applications which lie outside the KNP area. The Neighbourhood Planning Act (2017) is clear in this regard. It states that a local planning authority must notify the neighbourhood forum of “any relevant planning application” (section 2 (7)). A relevant planning application is one which “relates to land in the neighbourhood area” (2(3E)) It is not one which relates to a</p>	<p>i. Figure A1 at end of this document shows the proposed amendment to exclude any areas within the area of RBKC (this would replace Figure 1 in the Part Two document).</p> <p>ii. Para 2.6 is amended to read: <i>“Whilst the Plan policies relate only to the designated Neighbourhood Area, the community of Knightsbridge can be affected by licensed and other activities nearby what happens along its boundary and immediately on the other side of it. For example, in particular, tourists visiting Harrods have a substantial impact on Knightsbridge as well as activity in Hyde Park and Kensington Gardens can have a significant impact on the Neighbourhood Area e.g. nuisance noise from concerts.”</i></p> <p>iii. Para 2.8 is amended to read: <i>“It is also recognised that development outsidewhich impacts on the Neighbourhood Area can impact on itis not only that proposed within the Area or within the wider area of interest. For example, mMajor infrastructure road, rail and air proposals, in particular Crossrail and airport expansion, are likely to have an effect on the community of Knightsbridge. The localis community therefore has a right to be properly engagedconsulted in the relevant consultationdecision-making processes. Indeed, aAny major infrastructure development that is likely to adversely affect the quality of the air, water, soil or the noise environment within the Neighbourhood Area couldhas a right to be challenged. The Neighbourhood Forum expects to be consulted on such proposals and may, where appropriate, to respond</i></p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>property/ land which is adjoining the Neighbourhood Plan area or in a specified "area of influence."</p> <p>As such, if the KNP, and its supporting documents, retain the concept of an "area of interest", the area must be redrawn to remove any land within the Royal Borough.</p>	<p>or object accordinglysubmit comments or lodge an objection."</p> <p>iv. Para 2.9 is amended to read: <i>"Areas beyond the Neighbourhood Area boundary are not subject to the policies contained within the Plan or significantly affected by them. However Nevertheless, the Forum may wish to engage or reserves the right to comment <u>constructively</u> on <u>planning or licensing</u> applications within the wider 'area of interest' or <u>the Royal Borough of Kensington and Chelsea (RBKC) more widely. For example, RBKC has taken into account the comments from the Forum in the formulation of its Local Plan. In addition some of the neighbourhood management actions identified within this Neighbourhood Management Plan might affect this wider 'area of interest' and therefore it will be important to work with others – for instance RBKC, neighbouring residents groups and businesses – to agree and deliver shared outcomes. The Forum should listen to constructive 'inbound' comment."</u></i></p> <p>The Forum also considers, in order to avoid confusion that the following amendment is made to the first sentence of para 10.33 of the KNP: <i>"10.33 It is recognised that development outsidewhich impacts on the Neighbourhood Area can impact on it. is not only that proposed within the Area or within the wider area of interest. For example, mMajor infrastructure road, rail and air proposals, in particular Crossrail and airport expansion, are likely to have an effect on the community of Knightsbridge. The localat-community has a right to be</i></p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
				<p><i>properly engaged in relevantthe consultationdecision-making processes. Indeed, aAny major infrastructure development that is likely to adversely affect the quality of the air, water, soil or noise environment within the Neighbourhood Area couldhas a right to be challenged. The Neighbourhood Forum expectsreserves the right to be consulted on such proposals and may, where appropriate, to submit comments or lodge an objection accordingly."</i></p> <p>The Forum would also wish to note that the views of interested parties to the 'Area of interest' have been taken into account in defining its extent. Figure A1 at the end of this document shows the proposed Area now and Figure A2 shows the equivalent Area at Reg 14 Stage. These show significant differences which have been made to address the concerns of relevant parties.</p>
111.	KNP90	RBKC	KBR18: The Neighbourhood Plan includes a policy which intends to support A1 uses within the Knightsbridge International Centre. This should be amended to note that the policy only relates to that part of the International Centre which lies within the Neighbourhood Area. This amendment could be within the policy itself or within the supporting text.	The Forum notes this and agrees. In response to representations made by WCC on Policy KBR18, the Forum has proposed wording which will address this.
112.	KNP90	RBKC	KBR26/27: The Council recognises that the policies intend to ensure that a balance is reached between the need of the cultural institutions within the SCA and the amenities of established residents. This is welcomed as the Council recognise the importance of the SCA in the contribution of London as a	Regarding Policy KBR26, the Forum wishes to make clear that no reference is actually made in the policy wording to local residents, whether within the Neighbourhood Area or outside it. It is therefore unnecessary and unhelpful to make a change to the policy. However, the general principle is noted and the Forum proposes the following additional wording at the end of para 6.7.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>"World City". However, the policies should be amended to recognise that the amenity of residents <u>adjoining</u> as well as <u>within</u> the Neighbourhood Area are properly addressed. This is essential as an intensification of commercial activity has the potential to have a negative impact on those who live close by. This impact would be beyond the designated "neighbourhood stress areas". For clarity this reference should be added to both Policies KBR26 and KBR27.</p>	<p><u>"Such development should properly address the amenity of residents within the Neighbourhood Area and adjoining it."</u></p> <p>Regarding Policy KBR27(B), the Forum proposes the following amendment: <i>"B. Proposals will be expected to show how any potentially adverse impacts on the amenities of established residents and other occupiers <u>within the Knightsbridge Neighbourhood Area and adjoining it</u> have been minimised."</i></p>
113.	KNP90	RBKC	<p>KBR28: This policy considers how new development should provide new or improve existing infrastructure to support and to encourage more cycling and walking. It references Appendix D which includes a number of initiatives to help achieve this aim. These are set out in more detail within the Actions table in the Neighbourhood Management Plan.</p> <p>It is essential that these initiatives relate to sites within the KNP area only.</p> <p>Actions 52 and 53 are particularly problematical. The promotion of a segregated cycle track along Queen's Gate, greenways along Exhibition Road and Quietways for cyclists is not appropriate. These initiatives relate to land which lies outside the Neighbourhood Plan area. As such they will have implications of those living within Kensington and Chelsea without</p>	<p>The Forum notes that any priorities shown in Appendix D which relate to schemes outside the Neighbourhood Area, may require separate permissions. However, KBR28(B) does not suggest that the policy takes this legal duty away from the relevant local authority. Rather it reflects the fact that delivering these schemes will ensure that active travel provision will be improved in respect of the development that is delivered. In addition, the Forum wishes to note that the list in Appendix D has been through two rounds of statutory consultation. The actions in the Part Two Neighbourhood Management Plan are deliberately not drawn into this policy wording.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			giving these residents a chance to vote on the ultimate adoption of the Plan.	
114.	KNP90	RBKC	<p>Part Two: This document contains a number of actions which relate to areas which lie outside the Neighbourhood Area. This is not appropriate and those actions which relate to land outside the Neighbourhood Area must be removed.</p> <p>Actions 18, 30 and 31. It is not for the Neighbourhood Forum to become involved in this Borough's licencing regime.</p>	<p>This has been addressed in Entry 110.</p> <p>The Forum is not suggesting that it will be involved in the licencing regime as far as the nature of that regime and how it operates is concerned. However, the Forum has a right to respond to public consultations on any such matters and to lobby in respect of decisions which may have an impact on the Neighbourhood Area. The Part Two document reflects the issues which the Forum intends, at the current time, to lobby on.</p>
115.	KNP90	RBKC	Action 33. Whilst this Borough has initiatives to stop rubbish dumping, these will be carried out within the Royal Borough only, and not within WCC and the Neighbourhood Plan area.	The Forum notes this and would note that actions taken within the Neighbourhood Area could serve to reduce rubbish dumping and fly tipping within RBKC. Insofar as the reverse is also true, the Forum has a right to lobby RBKC and any other party on such issues.
116.	KNP93	WPA	We remain concerned that the plan is not pro-growth, and supports less development than that in strategic policy (the relevant policies of the City Plan and London Plan). We are concerned that this may particularly be the case respect of Hyde Park Barracks. The plan does not clearly demonstrate how Knightsbridge will contribute to meeting the City's broader growth targets.	The Plan does not promote less growth although it is acknowledged that reference to return of the Hyde Park Barracks site to parkland in Policy KBR14 requires amendment. This is addressed in response to the WCC rep on KBR14.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
117.	KNP93	WPA	The Plan continues to seek to prevent changes of use away from office uses across the area (Policy KBR21); this is significantly more restrictive than the approach adopted in strategic policy, which only seeks to prevent the conversion of offices to residential use within the Core CAZ. The Plan's support for new Class B1 offices is welcome.	<p>The retention of office space in the Neighbourhood Area is important to support the existing economy of Knightsbridge. Where a planning application is submitted that would result in the loss of Class B1 office space, KBR21 seeks to ensure that its loss can be fully justified. The reason for this is because, as explained in the supporting text and evidence base, Knightsbridge has a small but important employment base and it should be protected where possible. Once such uses are lost, it is unlikely that they will return and this will fundamentally alter the type of place that Knightsbridge is; indeed, its most obvious impact will be on the restaurants, pubs and cafés in the Area, many of whom receive a significant proportion of their trade from office workers.</p> <p>It should be noted that the policy received support at Reg 16 stage from the Knightsbridge Business Group, which represents a number of office-based employers in the Area.</p>
118.	KNP93	WPA	The plan does not appear to strike an appropriate balance social and environmental aspects of sustainability on the one side, and economic aspects on the other. We note that the proposed plan continues to propose the introduction of a Neighbourhood Stress Area which would introduce a more restrictive approach on non-residential uses than set out in strategic policy.	<p>The KNP encourages sustainable growth. It is a mistake to assume that an emphasis on growth which is compatible with a healthy environment is the same as a lack of support for development. The Basic Conditions Statement demonstrates that the KNP does strike an appropriate balance between the different aspects of sustainability. The Neighbourhood Stress Area policy seeks to address a specific local matter which has arisen in this part of the Area. In this regard, it guides new uses to ensure that such impacts are adequately mitigated.</p>
119.	KNP93	WPA	The draft plan continues to seek to impose significant additional burdens – in terms of both cost and procedural / information requirements – on both developers and the	<p>It is a mistake to regard requirements which ensure good, sustainable development as “onerous”. They are there to encourage sustainable development. They are positively welcomed by a large number of stakeholders. The Forum addresses each of the points in turn:</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>City Council (in terms of development management resourcing and enforcing). In particular:</p> <ol style="list-style-type: none"> 1. We remain concerned that complex arrangements regarding construction management continue to be proposed (Policy KBR23). These are inconsistent with the well-understood framework established by the City Council in the Code of Construction Practice and its associated requirements for construction management plans, proportionate to the scale and type of development, to be agreed prior to the start of construction; 2. Policy KBR34 would require developers to demonstrate utility capacity at planning stage. This would impose onerous additional requirements on developers when there is an obligation to provide it such capacity, subject to detailed subsequent discussions with the utility companies involved; 3. We recognise that changes have been made to policies relating to environmental performance and sustainability. Where these have addressed areas of concern raised in our previous response these are welcome but we remain concerned about the complexity of the proposed policy framework and, especially, where it does not distinguish 	<ol style="list-style-type: none"> 1. Paras 4.26-4.29 in the KNP provide clear justification as to why the proposed policy approach is efficient. 2. The Forum, through its engagement with the community, has identified this as an important issue which needs to be addressed and one that is often overlooked in the design of development. Other stakeholders have supported this approach at Reg 16 stage. In particular, reps by MSP Strategies (10) and Clear Air in London (52) demonstrate that there are the necessary technologies to deliver such requirements. 3. The size thresholds have been designed to align as closely as possible with those required by WCC for pre-application discussions and dealing with construction matters. It is important that, as well as at the strategic level, air quality and renewable energy matters are addressed locally, reflecting the local context of the area in question. In this regard, the policies for Knightsbridge are considered to represent an appropriate framework

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			between larger and smaller development proposals. This particularly relates to air quality and renewable energy which are strategic, rather than local, issues and which may be more appropriately addressed in City / London-wide policy.	for the types of development that commonly come forward.
120.	KNP93	WPA	Policies KBR4 and KBR32, as proposed, relate to improvements to the public highway such as the removal of utilities cabinets and installation of cycle hire and electric charging facilities. Whilst these may be desirable, alterations to highways are generally not within the control of developers and we are concerned this may be undeliverable;	The Forum notes the point and, in response to reps made by WCC on KBR4, has proposed an amendment to refer to addressing such 'where possible'. In respect of cycle hire and electric charging facilities, these are likely to become increasingly common and, in particular, large developments such as any redevelopment of the Hyde Park Barracks site should be encouraged to address these matters on site.
121.	KNP93	WPA	Policy KBR11 set out very detailed requirements regarding urban greening which may not be achievable in all cases and which may be more appropriate as guidance;	Urban greening is important if Knightsbridge is to improve the health of the people who live, work and visit the area and to improve biodiversity. However, KBR11 recognises that such requirements may not be achievable 'in all cases' and, recognising the need for flexibility, uses the words 'practical and viable'. The Forum asks the Examiner to note the equivalent policies in the New London Plan consultation document as evidence of the importance of this type of policy at a pan-London level. This policy was supported by the GLA (99) at Reg 16.
122.	KNP93	WPA	KBR28 requires "new development" to provide new or improved active transport infrastructure. Many small scale "developments" (ie, alterations for which planning permission is required) will not be of a size to provide new or improved infrastructure;	The KNP is designed to encourage the uptake of active travel for the benefit of the health of the local community which in turn can improve the environment and reduce congestion. KBR28 does not 'require' new "infrastructure", rather, it expects development to 'maximise opportunities' for active travel by providing or improving infrastructure or facilities. This could be done in small scale development, for instance,

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
				by providing showering facilities. Clearly the scope for smaller developments to achieve this is likely to be more limited but the policy seeks to be positive in encouraging all types of development to fully consider such opportunities.
123.	KNP93	WPA	KBR36 suggest that development should avoid the use of any fossil fuels. It has not been shown that this is deliverable;	The policy restricts the use of fossil fuels on site in order to improve the long term sustainability of development, recognising the requirements of the Climate Change Act. It is something that all development will have to consider doing in the near future if carbon budgets are to be met. The Sustainability Report which was submitted at Reg 16 stage considered viability matters. The Forum also draws the Examiner's attention to the responses from Cundall (88), MSP Strategies (10), the Building Engineering Services Association (BESA) (45), Clean Air in London (52) and the Environmental Industries Commission (81). These organisations are working at the forefront of environmental technologies, often on behalf of commercial enterprises, and yet none suggest that this policy is not deliverable or could have issues for the viability of development.
124.	KNP93	WPA	KBR40 goes beyond strategic policy and national guidance regarding drainage and flood risk;	Without detail as to exactly how the WPA considers KBR40 goes beyond strategic policy and national guidance, it is difficult to be certain as to the nature of the issue. However, the Forum disagrees with the general assertion. It would also wish to highlight the amendments it proposes to KBR40, following reps made by WCC, which would require development to 'minimise consumption' rather than 'reduce water consumption to a minimum' as currently drafted.
125.	KNP93	WPA	KBR42 encourages consultation and discussion. This is best practice and to be encouraged, but is not appropriate for inclusion as a planning policy to guide	The Forum was encouraged by WCC to include a policy similar to Policy S47 in WCC's own City Plan in order to demonstrate explicitly that 'sustainable development' is supported by the KNP.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			landowners and developers as to when proposals will be acceptable.	Compliance with the Community Engagement Protocol ("CEP") is likely to have significant benefits for developers as there is a much greater chance that they will arrive at a more sustainable solution that has the support of the local community. This has the potential to benefit all. Nevertheless there are no penalties for not complying with the policy or the CEP and so the policy cannot be said to 'guide when proposals will be acceptable'. Indeed, the CEP is only referred to in the context of giving developments 'guidance' on what is considered best practice by the local community.
126.	KNP93	WPA	KBR30: It is vital that policies relate to the proposed use of land rather than procedural requirements as to how applications are to be determined, which remains the responsibility of the City Council. For example, stipulating the content required in Transport Assessments may not be appropriate (Policy KBR30).	The policy signposts matters of importance within the Knightsbridge context which could arise from developments that are <i>likely</i> to have significant impacts, i.e. applications that require a Transport Assessment.
127.	KNP94	Woodland Trust	KBR39: ...the numbering of this policy could be improved to ensure it can be referenced effectively, using a mixture of number and letters would be clearer than just using upper and lower case letters as at present. My only comment (which is only for clarity and in no way impacts the soundness of the plan) is that the numbering of this policy could be improved to ensure it can be referenced effectively, using a mixture of number and letters would be clearer than	Forum notes the comment which the Forum will consider for future versions of the KNP. However, this version uses the style A. a. throughout so would be unhelpful to the Examiner to be changed at this stage. However, the Forum would not object to numbering the policies in this way.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			just using upper and lower case letters as at present.	
128.	KNP95	Caroline Russell AM	<p>Concerned that WCC (Regulation 18 notice) may be seeking to curtail or not support fully neighbourhood planning.</p> <p>KBR14: Surprised it allows for so much parking. Any new development should be car free.</p> <p>KBR23 and Appendix C: Planning examiner should tighten the application of Appendix C requirements so that they are all 'required' on a 'best efforts' basis unless a developer can demonstrate convincingly that a particular standard or procedure is technically impractical or not relevant.</p> <p>KBR35: Should require more of developers sooner.</p> <p>KBR36: Plan proposes to address issues in a realistic and deliverable way.</p> <p>KBR39: Excellent and practical way to preserve and enhance the urban forest at no significant cost.</p> <p>KBR42 and Appendix F and KBR23 and Appendix C: clarity they offer will assist the local community, developers, planning</p>	<p>Noted. Forum's response to WCC's consultation on its Regulation 18 notice registered a similar concern.</p> <p>Forum is aware of that the New London Plan proposes tighter standards. Addressed in Entry 33.</p> <p>Forum acknowledges the importance of action to mitigate construction impacts. It considers however that the obligations in KBR23 and the recommendations in Appendix C strike an appropriate balance for viability.</p> <p>Forum's objectives and policies encourage developers to do more, including over time, while balancing viability considerations.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p> <p>Forum notes support. No change to KNP.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			<p>officers and others to improve local decision making in a consistent and practical and therefore transparent time and cost saving manner.</p> <p>Part Two: Actions should include supporting the banning of diesel vehicles soon in London and the identifying more measures to address urgently the terrible record of Brompton Road and Knightsbridge for deaths and injuries from road traffic collisions.</p>	<p>The Forum acknowledges that the direction of travel away from fossil fuelled vehicles in London is increasingly clear. However, the Forum's proposed actions reflect the views of people in the Knightsbridge Neighbourhood Area after several rounds of consultation.</p>
129.	KNP98	Brompton Association	<p>It is for this reason that we now write to set out our concerns. Fundamentally, we object to those aspects of the plan which are intended, in our view quite deliberately, to set the policy scene for a geographical area well beyond the boundaries of the KNF which is entirely within Westminster, not RBKC. This is a particular issue with the parts of the KNP that deal with the cultural institutions along Exhibition Road. The majority of these, including the three national museums, are not in Westminster but in RBKC. It is quite wrong, in our view, for the KNP to refer to the area of Exhibition Road that is in Westminster (ie the area of the road to the north of Imperial College) as the Strategic Cultural Quarter and thus deliberately to blur the boundaries by referring to the national museums which lie well to the south. The area north of Imperial College is very largely</p>	<p>The KNP can only address matters within its Area therefore does not have policies that directly relate to the three national museums. The policies in the KNP can only apply to the identified Neighbourhood Area. They must also be read together. The Forum is proposing to address all the points made by RBKC in its Regulation 16 representation to address the risk of any residual issues.</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			residential in character – as is most of the area covered by the KNP. Residents in RBKC will have no vote on the KNP and it is thus undemocratic for policies to be included in the KNP that could affect the amenity of residents living beyond the KNP boundary.	
130.	KNP98	Brompton Association	<p>There is in our view a serious lack of balance in the current KNP document. Insufficient care has been taken in describing the character of the area accurately – which is varied and as already mentioned is largely residential. As a result there is a lack of emphasis on the need to protect residential amenity, particularly in the sections which deal with Exhibition Road and the cultural quarter. As such, the document does not sit in harmony with the Westminster City Plan or the London Plan. This is extremely concerning.</p> <p>The emphasis on pedestrianisation, on encouraging student accommodation and accommodation for workers at the cultural institutions and on encouraging more cultural and educational uses is very one-sided and simply not appropriate.</p>	The KNP reflects the needs for sustainable growth which respects the existing use of the neighbourhood area, in particular amenity of its residents. The Forum considers that the policy wording in the KNP reflects this appropriately.
131.	KNP98	Brompton Association	KBR26/27: The KNP supports ancillary developments within “the Strategic Cultural Area which help broaden the appeal and promote the remit of cultural, education and	This has been addressed in Entry 66.

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
			research organisations" but does not specify what these developments might be.	
132.	KNP99	GLA	<p>It is felt that the KNP could go further in setting a clear positive vision for promoting growth in the Plan area and to help meet the strategic needs of both the Westminster City Plan and the London Plan.</p> <p>KBR24: ...in our previous letter we raised the issue that there was no explicit reference to how the KNP will help Westminster meet and exceed its London Plan housing target of 1,068 units per annum. The potential to deliver additional housing should be explored.</p>	<p>The Forum is clear that neighbourhood plans are not required to explicitly address how additional housing should be delivered. The City Plan has allocated development sites to address the identified housing needs and the KNP provides locally specific context to ensure development enhances the sustainability of Knightsbridge, economically, socially and environmentally.</p>
133.	KNP99	GLA	<p>KBR16: This policy could be written more clearly. It is not clear whether there is a distinction between "the amenity of residents..." in A. a. and "environmental amenity" in A. b.</p> <p>It is also unclear what is meant by "demonstrating that individually and cumulatively there are no significant adverse effects on...c. cumulative impacts..."</p>	<p>The Forum proposes that KBR16(A)(b) and (c) are deleted which should adequately address this issue.</p> <p>The Forum proposes that KBR16(A) should be amended as follows: <i>"Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that individually and cumulatively there are no significant adverse effects on</i> a. the amenity of residents and other uses that are sensitive to noise ; b. environmental amenity taking into account the potential for noise, disturbance or odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises; and/or</p>

Entry	Rep. ref.	Organisation	Issue raised	KNF recommended response
				<i>€ cumulative impacts (including from those properties located outside adjoining the Knightsbridge Neighbourhood Area boundary).</i>
134.	KNP99	GLA	<p>KBR35: Some of the wording of KBR35 could be clearer, particularly references to environmental standards in part B and what is expected of developers in part F.</p> <p>It should be noted in line with the NPPF, policies must be deliverable over the plan period.</p>	<p>The Forum considers that, to improve the policy, the wording of KBR35(B) should be amended to read: <i>“B. Development should comply at least with all minimum EU or UK environmental standards requirements in relation to air pollutants whichever is the more stringent.”</i></p> <p>To improve KBR35(F), the Forum proposes the following small amendment to the 3rd sentence in paragraph 10.7: <i>“...Appropriate standards for the selection of energy efficient air filters to demonstrate compliance with design standards in Policy KBR35(F) include BS <u>EN 16798-3:2017 (for minimum air filtration efficiency)</u>, BS <u>CEN ISO 16890-1:2016 (for particulate matter} including PM1}</u> and <u>BS CEN ISO 10121-2:2013 (for gases)...”</u></i>”</p> <p>The Sustainability Report which was submitted at Reg 16 stage considered viability matters. The Forum also wishes to draw the Examiner's attention to the responses at Reg 16 stage by the Cundall (88), BESA (45), MSP Strategies (10), Camfil (76), the Federation of Environmental Trade Associations (91), Clean Air in London (52) and the Environmental Industries Commission (81). These organisations are working at the forefront of environmental technologies, often on behalf of commercial enterprises, and yet none suggest that this could have issues for the viability of development.</p>

Further erratum:

- i. Part 3, Figure 15 (page 79) should be amended to read: "*Figure 15 ~~Vehicle~~ Cycling desire lines*'

Figure A1: Proposed amendment to 'Area of interest' (Figure 1 in Part Two document)

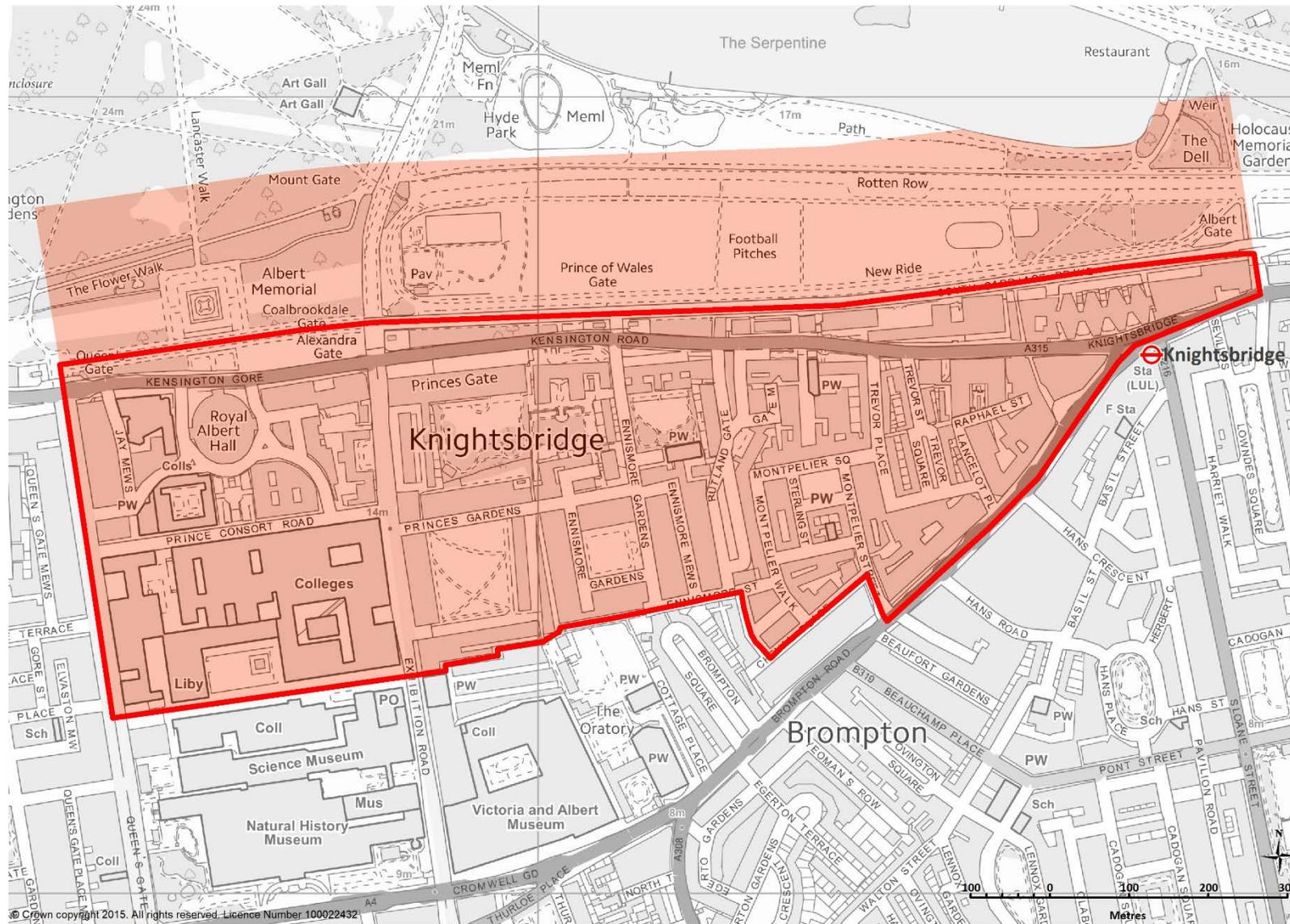


Figure B: Proposed amendment to Figure 2a in Part 1

Amendment to reflect fact that Hyde Park Barracks is a sui generis use and 2 Montpelier Street is an A1 use, not A3

- USE CLASS**
- A1 Shops
 - A2 Professional Services
 - A3 Restaurants and cafés
 - B1 Business/Offices
 - C1 Hotels/Services Apartments
 - C2 Residential Institutions
 - C3 Residential
 - D1 Non-residential Institutions
 - D2 Assembly and Leisure
 - Sui Generis
 - Use unconfirmed
- - - - Neighbourhood Plan Boundary
● ● ● ● Strategic Cultural Area

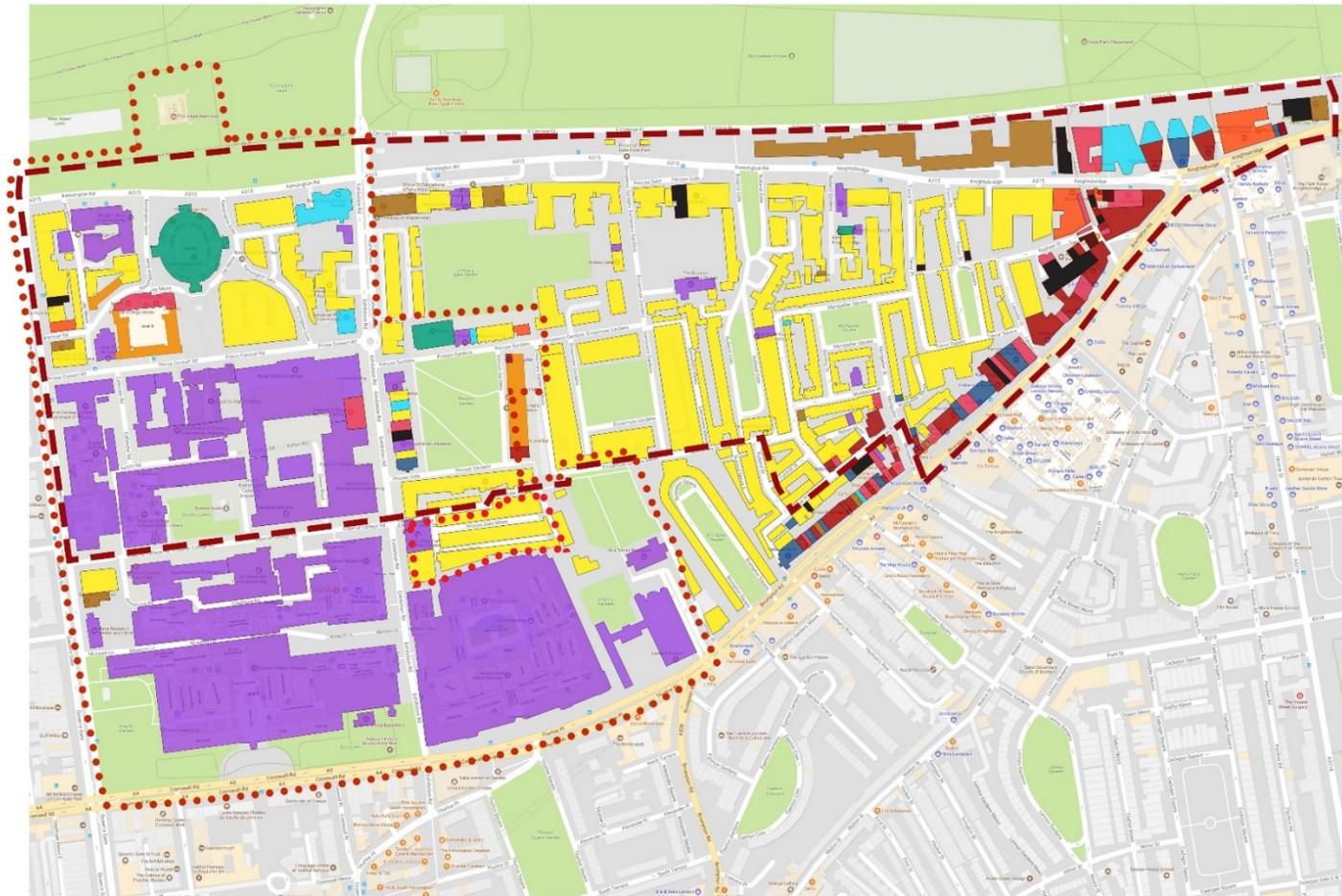
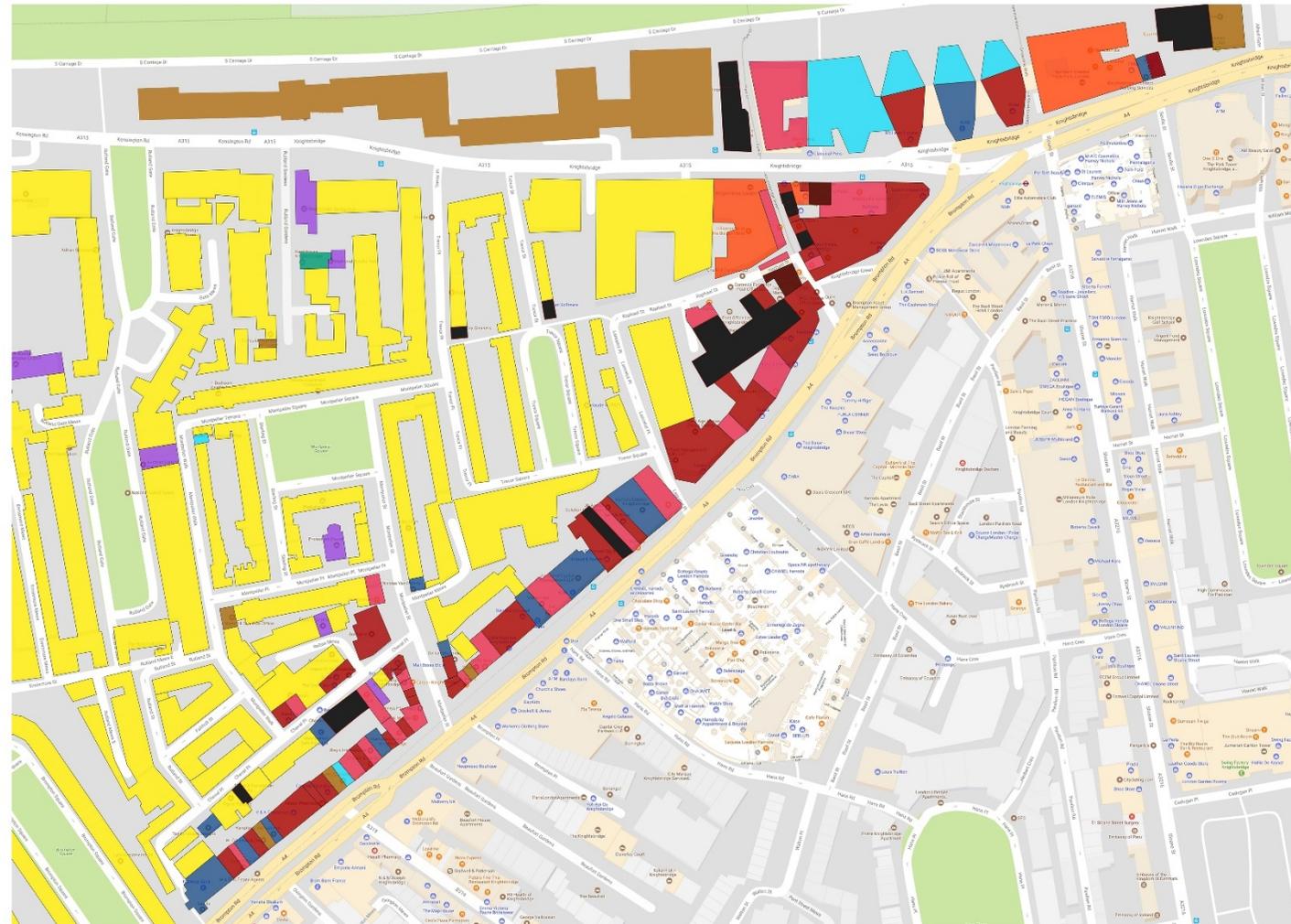


Figure C: Proposed amendment to Figure 2b in Part 1 and Figure 9 in Part 3

Amendment to reflect fact that Hyde Park Barracks is a sui generis use and 2 Montpelier Street is an A1 use, not A3

- USE CLASS**
- A1 Shops
 - A2 Professional Services
 - A3 Restaurants and cafés
 - B1 Business/Offices
 - C1 Hotels/Services Apartments
 - C2 Residential Institutions
 - C3 Residential
 - D1 Non-residential Institutions
 - D2 Assembly and Leisure
 - Sui Generis
 - Use unconfirmed



25 0 25 50 75 100 m

Figure E: Proposed amendment to Policies Map Inset
 Amendment to show Local Buildings and Structures of Merit

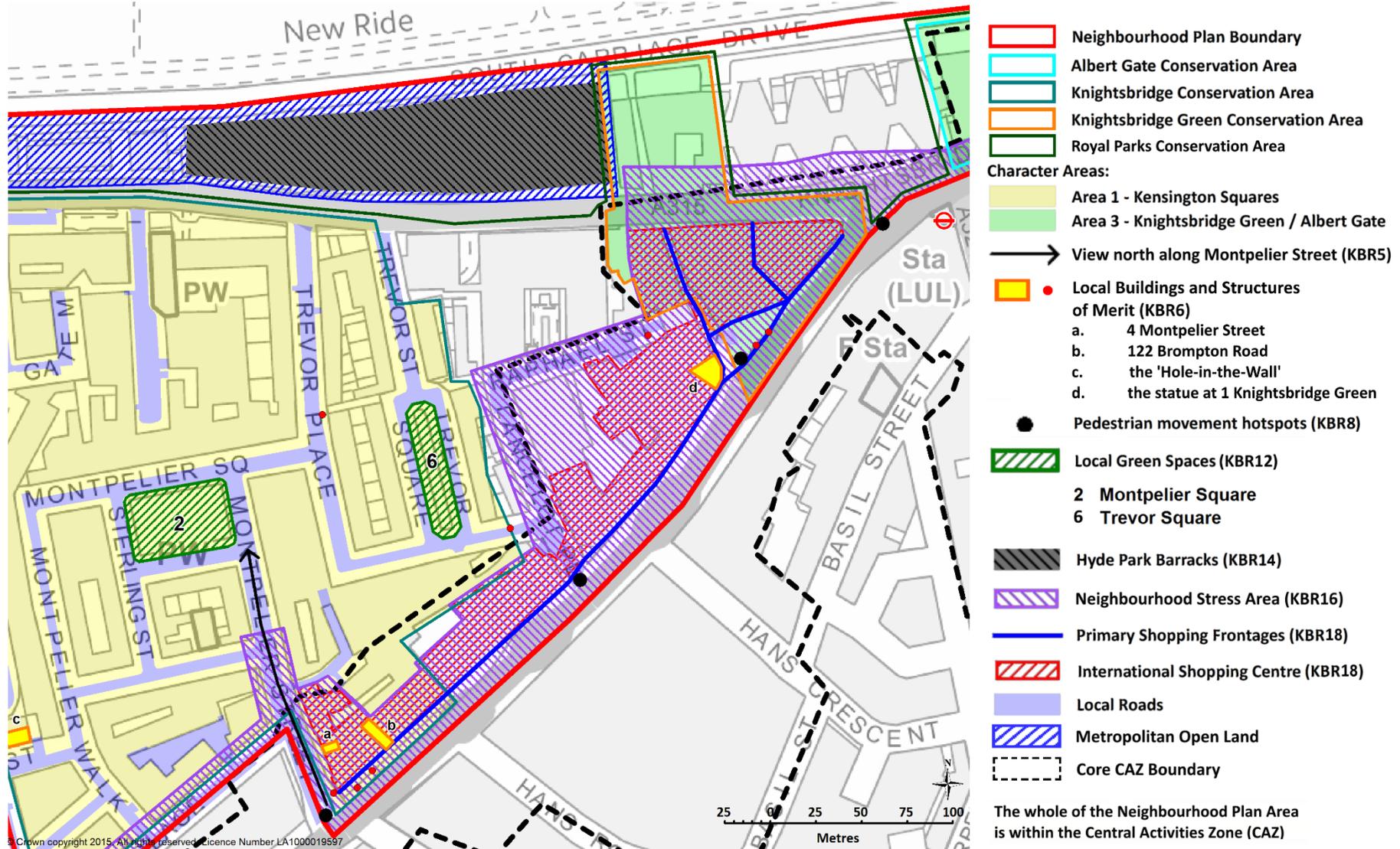


Figure F: Proposed amendment to Figure 13 in Part 3
Amendment to no longer show Imperial College Road as a Local Road

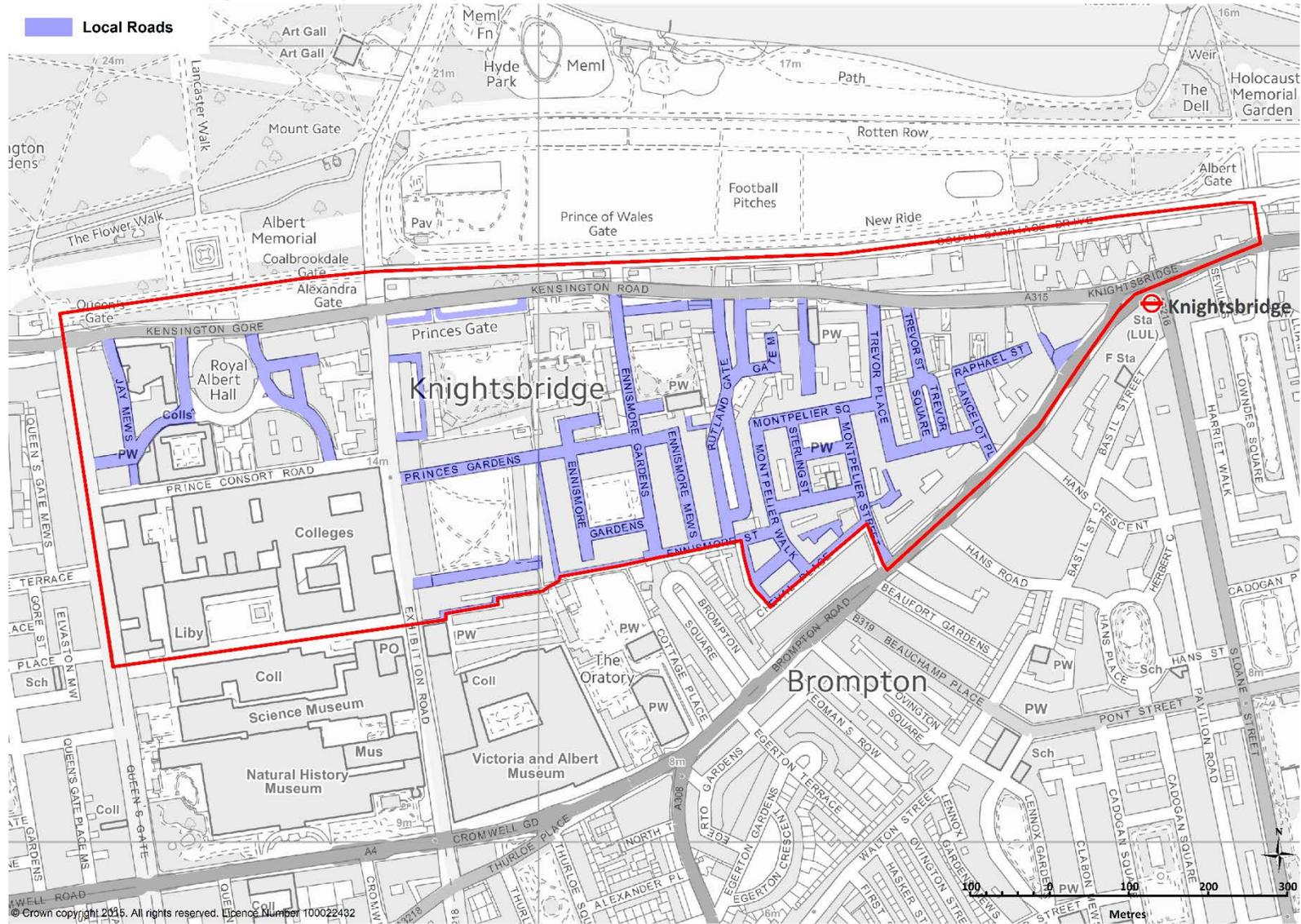


Figure G: Listed street objects and furniture

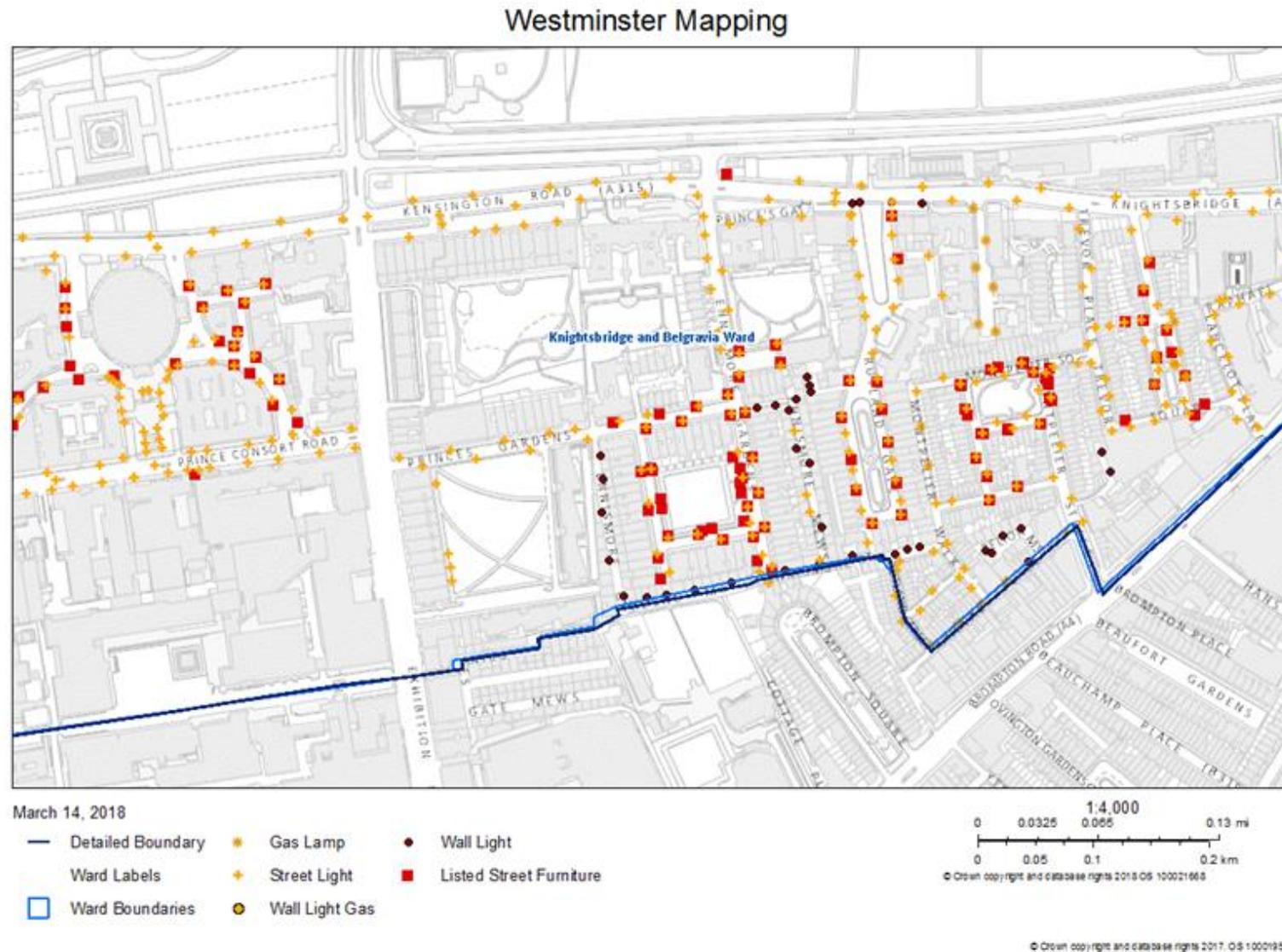


Figure H: Tree health in the Royal Parks

TREE HEALTH IN THE ROYAL PARKS

A commentary
Ian Rodger TRP Arboricultural Officer



There are approximately 170,000 trees across all The Royal Parks. They form the backbone of the Park landscapes and have considerable aesthetic, environmental and ecological value. Hyde Park and Kensington Gardens are two of the busiest parks in London in which a high proportion of the estimated 77 million Royal Parks annual visitors spend time in or moving through these historic landscapes. The past decade has seen a significant rise in tree pests and diseases which threaten our park landscapes, both from a visual and health and safety perspective. As an organisation we are totally committed to the preservation of our treescape but also providing a safe environment for people to enjoy which requires a careful balance between risk management and conservation. Three tree pests are of particular concern within the central parks: a fungal disease called Massaria, *Splanchnonema platani*; Oak processionary moth; and a bacteria which causes Bleeding canker, *Pseudomonas syringae* pv. *Aesculi*.

Massaria, Splanchnonema platani
A quarter of the trees in Hyde Park are London Planes and since 2008 there has been a significant rise in a fungal disease called Massaria, *Splanchnonema platani*; this kills the bark and cleaves the wood so rapidly that branches can snap out within three months of the infection being identified. With a large

proportion of TRP’s Planes growing in high occupancy areas it was decided to recruit a new member of staff solely to inspect Planes for Massaria and work with our tree contractors to remove the infected branches before they fail. Published studies have indicated that drought is one of the main triggers of Massaria so in 2012 a research project was initiated to investigate soil improvements to try and mitigate water stress. Several groups of Planes were selected in Kensington Gardens and different combinations of de-compaction, mulching and aerated compost ‘teas’. Soil samples have been analyzed and show a very positive rise in beneficial fungi and micro organisms; canopy densities have also improved over the untreated controls.

Oak processionary moth
A recent introduction from Europe, Oak processionary moth has colonised most of west and central



London and has been present in both Hyde and Kensington Gardens since 2012. In large numbers the caterpillars can completely defoliate trees but the main issue is with public health as they are covered in detachable poisonous hairs. The caterpillars form dense clusters, later nests on main stems which are protected within silk tents, these can be found anywhere on the tree from ground level upwards and from these they ‘process’ along branches to feed on the foliage. Since 2013 preventative spraying of *Bacillus thuringiensis* (BT) has been used in Hyde Park and Kensington Gardens to control numbers of the caterpillars. This biological control affects the larva’s ability to feed and kills it before it develops the poisonous hairs but it will also kill other non-target species of caterpillar which hatch at the same time so application is carefully planned and rotated each year.

Horse Chestnut leaf miner and Bleeding canker
Pseudomonas syringae pv. *Aesculi*
One of the more noticeable pests in Hyde Park and Kensington Gardens is Horse Chestnut leaf miner, the larva of which eats the central layer of the leaf; these become brown and distorted by mid-summer and often fall early. Although very unsightly it only has a moderate effect on overall tree health unlike the Bleeding canker *Pseudomonas syringae* pv. *Aesculi* which has had a dramatic effect on Horse Chestnuts across all the parks. This bacteria kills strips of bark on the trunk and major limbs; symptoms visible on affected trees include areas of weeping rusty brown to black exudates, wilting and die back in the canopy and strips of dead, rapidly degrading patches of dying bark. Death in young trees can be rapid as the lesions quickly coalesce due to the smaller stem diameter, however the impact on the environment can be particularly profound when large, mature trees are infected and disfigured by subsequent limb failure and pruning due to the decaying lesions. Management of this disease is difficult as the bacteria is endemic and research into treatments or resistance has so far been minimal, the only recourse is to monitor infected trees and prune to reduce the risk of limb failure and in the worst cases total removal. These three pest and diseases are the main and most costly current problems in Hyde Park and Kensington Gardens but there are other very serious diseases on the horizon which could prove devastating to London’s tree population. Canker stain of Plane, *Ceratocystis platani* is a vascular wilt (similar to Dutch Elm disease) which affects London Plane causing wilt and die back in the canopy and death within a few years. Plane avenues will be particularly susceptible as



is mostly found in southern Europe but is slowly spreading northwards in France; The Royal Parks is very active on the local and national working parties established to prevent its entry into the country. Having devastated the entire native Chestnut population in north America, Chestnut blight *Cryphonectria parasitica* has spread throughout Europe and there have been sporadic outbreaks in the UK. This fungus causes rapidly spreading cankers on the bark of Sweet Chestnut, *Castanea sativa* which disrupt the physiological processes of the tree eventually leading to death. There are some very valuable veteran Sweet Chestnuts in Kensington gardens and a significant young avenue in Hyde Park all of which are closely monitored by the park’s arboricultural team. Other devastating pests such as Asian longhorn beetle and Emerald Ash borer and diseases such as *Xylella fastidiosa* could be imported into the country on plant material or wooden packaging. The Royal Parks, working with other organisations, developed its own bio-security policy which restricts the purchase of any susceptible plant material, inspects all deliveries and insists on a robust bio-security management from its suppliers.

Combating the challenges
Along with the management of the current range of pests and diseases The Royal Parks is proactive in the improvement of the soil and growing conditions across the parks with a programme of de-compaction works and the use of mulch and other soil conditioners. Over time these will help to increase in beneficial soil fungi and micro organisms and this will increase the trees vitality and make them more resilient to drought stress, a major predisposing factor in tree diseases. This vital work to monitor and protect our trees will make them safe for the public to enjoy and help preserve them for future generations.

Detail of entry numbers relating to each representation

Rep. reference	Organisation	Entries
62*	Westminster City Council (WCC)	1 to 51
10	MSP Strategies	52 to 54
13	Transport for London (TfL)	55 to 57
17	Lorraine Craig	58
20	Friends of Hyde Park and Kensington Gardens (FHPKG)	59
30*	Prince's Gate Mews Residents' Association (PGMRA)	60 to 66
31*	Onslow Neighbourhood Association	67
45	Building Engineering Services Association (BESA)	68
47*	Kensington Society	69 to 70
48	Matthew Bennett	71
49*	Westminster Cycling Campaign	72 to 74
52	Clean Air in London	75
54	V Clyde	76
56	The Royal Parks	77
57	Knightsbridge Residents Management Company	78
63	Bluepoint	79
64*	Defence Infrastructure Organisation (DIO)	80 to 100
65*	John Cox	101
73	Exhibition Road Cultural Group	102
76	Camfil	103
77	Thames Water	104
81	EIC	105
84	Chelsfield	106
88	Cundall	107
89	Imperial College London	108 to 109
90*	Royal Borough of Kensington and Chelsea (RBKC)	110 to 115
93*	Westminster Property Association (WPA)	116 to 126
94	Woodland Trust	127
95	Caroline Russell (Assembly Member)	128

Rep. reference	Organisation	Entries
98*	Brompton Association	129 to 302
99	Greater London Authority	132 to 134

Notes:

Where a representation reference is not mentioned in the document, these have offered blanket support for the Plan.

* These are representations with several adverse comments.