11th May 2018

Dear Ms Kingaby

Knightsbridge Neighbourhood Plan Examination

I am writing to correct an inaccuracy in the commentary provided to you by the Forum rebutting our concerns about aspects of the proposed Plan and to clarify, briefly, a couple of aspects of our previous representations as it appears that the Forum has misunderstood entirely certain aspects of our concerns.

Firstly, I should like to state that it is inaccurate to say – as the Forum has told you – that the area covered by our Association is outside the Neighbourhood Plan Area. In fact the northernmost arm of the Mews is in Westminster and is covered by the Neighbourhood Plan. We trust that this inaccuracy will not result in Mews residents in the Forum area being excluded from any Referendum.

Our partial inclusion in the Forum Area and the close proximity of the rest of the Mews to the Area, combined with the fact the Mews is a cul de sac with its only access obtained via Exhibition Road means aspects of the Plan have the capacity to affect us profoundly – hence our close interest.

We should also like to clarify an area of our comments which the Forum has misunderstood. The Forum say that the wider Plan covers the need to protect residents’ interests and also the fact the Forum area is residential meaning, viewed as a whole, in their view the Plan is not unbalanced in how it refers to the ‘Strategic Cultural Area’. However, our concerns relate to the specifics of the plan text as it relates to the proposals in and description of the so-called cultural area.

Based on an inaccurate description of the vast majority of the Forum’s part of the SCA as being cultural in use (which it is not) and always being intended to be cultural (which again is untrue - James Freake and others built much housing in the Area before the Great Exhibition – much to the Commissioners’ annoyance in the 1860s!) the Forum text specifically says developments in the area should be reserved for Cultural Uses. This is a very significant shift in planning policy justified on the basis of inaccurate data.

We have absolutely no objection to encouragement of cultural uses in the SCA – but the Plan’s exclusive favouring of the institutions in planning terms is itself unbalanced and cuts across the interests of both commercial and residential stakeholders. Similarly, to say the rest of the Plan will mitigate the impacts on residents of ancillary developments in the institutions and pop up events in the street misses our point entirely. Our point is that the Plan contains an implicit planning policy change that such ancillary developments and events are in principle acceptable and to be welcomed – requiring only management, not justification in a highly residential area. This policy shift too is unbalanced in that it favours institutions over the interests of residents – and indeed commercial operators who we are sure would also like to have pop up events and cafes-bars/shops etc in and around Exhibition Rd. Again, in an area of acute residential housing shortage with long waiting lists of those in priority need, the blanket favouring of development for cultural uses and for housing for workers in the institutions and students is unbalanced (not to mention in conflict with the text of the London Plan and with housing targets). Moreover, the fact the institutions in the area support changes which serve to benefit them exclusively is not itself a justification for unbalanced proposals.
For all the reasons set out above, we consider these aspects of the Plan fail to meet the basic conditions. Existing planning policy and legislation already lays out strong policy to ensure the interests of all parties are respected and fair and balanced sustainable development can be achieved and the Plan cannot and should not overset this balance. We do hope the Forum will this time listen to and address these concerns (for clarity, proposed new changes to the text do not remedy our concerns) as there is much that is good in the Plan and we would not want to be forced to encourage residents to oppose it in any Referendum.

Finally, I also note that the Forum has asked that earlier informal correspondence sent by me be included in published materials (and indeed my earlier correspondence has now been made public). At the least it would have been courteous to have consulted me before publishing my correspondence. I had not ever intended this material to be made public. It may be that the nature of the process means that my consent to publication was implicit in my giving comments at all – but if this is not the case I should like my earlier correspondence removed from the website/publication.

Yours sincerely

Jane Whewell
Chair, Princes Gate Mews Residents’ Association

Ms Kingaby
Intelligent Plans and Examinations (IPE) Ltd.