

# KNIGHTSBRIDGE NEIGHBOURHOOD FORUM



## Knightsbridge Neighbourhood Plan 2018 – 2037

Knightsbridge Evidence Base Document  
December 2018

## CONTENTS

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<b>INTRODUCTION</b>	<b>2</b>
<b>KNIGHTSBRIDGE'S CHARACTER</b>	<b>3</b>
<b>KNIGHTSBRIDGE'S COMMUNITY</b>	<b>49</b>
<b>KNIGHTSBRIDGE'S CULTURE AND EDUCATION</b>	<b>66</b>
<b>KNIGHTSBRIDGE'S PUBLIC SPACES AND UTILITIES</b>	<b>74</b>
<b>KNIGHTSBRIDGE'S ENVIRONMENT AND PEOPLE</b>	<b>88</b>
<b>LIST OF KEY EVIDENCE DOCUMENTS</b>	<b>98</b>

**Appendix:** Transforming our world: the 2030 Agenda for Sustainable Development

## INTRODUCTION

- 0.1** The Knightsbridge Neighbourhood Forum (called the Forum, KNF or Neighbourhood Forum) was designated by Westminster City Council (WCC) on 21 July 2015.
- 0.2** The Knightsbridge Evidence Base Document (called the Evidence Base Document or KEBD) sets out the evidence that underpins the policies contained in the Knightsbridge Neighbourhood Plan. The Knightsbridge Neighbourhood Plan is referred to as the KNP, Neighbourhood Plan or Plan while the area it covers is referred to as the Area, KNA or Neighbourhood Area.
- 0.3** The Evidence Base Document mirrors the sections of the Plan to enable easy read-across between each policy and the evidence underpinning it. Hence, as with the Plan, each theme has its own chapter, subdivided into the objectives, sub-objectives and finally the policies themselves.
- 0.4** Evidence has been compiled from a number of sources:
- Extensive engagement with the community and local stakeholders including through workshops, face-to-face meetings, leaflet drops, local surveys and online representations.
  - Local surveys and ‘walkabouts’ to understand, catalogue and monitor various activities within the Area.
  - Compilation of statistics and facts from existing documents and reports relating to Knightsbridge and experts.
- 0.5** The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Knightsbridge, that is the London Plan and the Westminster City Plan (WCP). Throughout this document, for each Neighbourhood Plan policy, the relevant policies from these two other plans are referenced. In addition, this document also highlights the saved policies from WCC’s Unitary Development Plan that the Neighbourhood Plan policies are consistent with.
- 0.6** Additionally, the Plan has sought to embed the 17 Sustainable Development Goals (SDGs) within the United Nations 2030 Agenda for Sustainable Development to stimulate action in areas of critical importance for humanity and the planet. Further information on the 2030 Agenda is provided in the Appendix.
- 0.7** It is recommended that the policies in the Plan are read in conjunction with this Evidence Base Document in order to understand fully the context for each policy and to help explain what each policy is trying to achieve.

# KNIGHTSBRIDGE’S CHARACTER

## 1 OBJECTIVE 1.0 — ENHANCE THE SPECIAL CHARACTER OF KNIGHTSBRIDGE INCLUDING ITS ARCHITECTURE, HERITAGE, TOWNSCAPE AND TREES WHILE RECOGNISING ITS STATUS INTERNATIONALLY AS A PRIME RESIDENTIAL NEIGHBOURHOOD AND CENTRE FOR RETAIL, CULTURE AND EDUCATION

Sub-objective 1.1 Ensure that all development applies the highest quality design and materials

### POLICY KBR1: CHARACTER, DESIGN AND MATERIALS

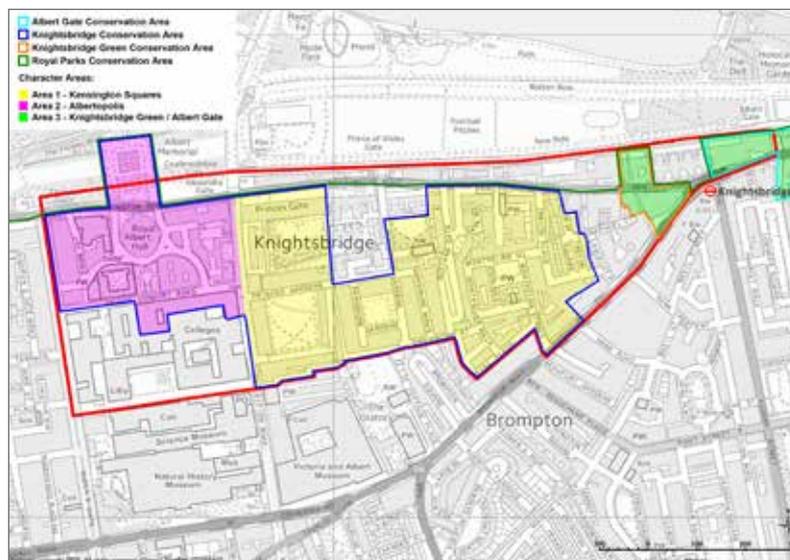
1.1 This policy aims to protect the recognisable character Knightsbridge when planning for new development or redevelopment. This character is reflected across the range of uses, from the residential squares including terraces, mansion blocks and mews, to the hotels and then to the iconic cultural buildings and landmarks such as the Royal Albert Hall; equally iconic buildings immediately outside the Area such as the Albert Memorial enhance this.

1.2 It seeks to promote and reinforce local distinctiveness as set out in the NPPF while not compromising the ability for development to be contemporary. It conforms to Policy 7.4 (Local Character) and Policy 7.6 (Architecture) of the London Plan; and Policy S28 (Design) of the WCP. It is consistent with saved Policy DES1 (Principles of urban design and conservation) of the Westminster Unitary Development Plan (UPD). Policy DES1 articulates the importance of development being of the highest standard and of respecting the local character, including in the use of materials and surface treatment. Policy KBR1 articulates this in more detail for the Knightsbridge Neighbourhood Area.

1.3 The application of this policy can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

1.4 The character of the Area is articulated in the Conservation Area Audit (CAA) for Knightsbridge, Knightsbridge Green and Albert Gate<sup>1</sup> and summarised in Figure 1.

Figure 1: Knightsbridge Conservation Areas and Character Areas



1 City of Westminster (2009) Conservation Area Audit and Management Proposals: Knightsbridge; Knightsbridge Green; and Albert Gate

- 1.5** The eastern half of the Knightsbridge Character Area (CA) (Character Area 1 – referred to in the CAA as ‘Kensington Squares’ despite being in the Knightsbridge Area) - is an area of residential terraces and garden squares. Here, buildings are generally lower in height than in the rest of Area 1, plots are smaller and streets narrower, creating a sense of intimacy and character. Terraces are mainly of yellow stock brick, stucco, half stucco or a few are faced in stone. The garden squares are of central importance to the character of the area. Despite an absence of street trees, the planting in the private garden squares and other spaces gives the Area a quiet, leafy character.

*Residential terraces and mews: Lancelot Place and Ennismore Gardens Mews*



*Garden squares: Montpelier Square and Ennismore Gardens*



- 1.6** The western half of the Knightsbridge CA (Character Area 2 – ‘Albertopolis’) is dominated by a number of large-scale cultural and educational institutions, centred on the Royal Albert Hall and including the large mansion blocks adjacent to the hall. The full extent of the Strategic Cultural Area, or the area created from the legacy of the Great Exhibition of 1851, is affectionately known as ‘Albertopolis’. The character here is dominated by buildings mainly in red brick or terracotta, on large plots and of a large scale. The Albertopolis area extends south beyond Prince Consort Road, north of Cromwell Road, east of Queen’s Gate and west of Exhibition Road to include much of the Imperial College London estate. Policy KBR1 covers the whole of this area, but provides an emphasis on certain characteristics within the character areas.

*Imperial College London*



*Royal College of Music*



*Red brick and terracotta,  
Prince Consort Road*

*Large mansion blocks close to  
Royal Albert Hall*



*Examples of Knightsbridge's character: terraced housing and iconic buildings*



- 1.7** The two Conservation Areas of Knightsbridge Green and Albert Gate (Character Area 3 – ‘Knightsbridge Green/Albert Gate’) consist mainly of large-scale red-brick mansion blocks and hotels. The Knightsbridge Green CA has a more consistent character with its townscape comprising buildings of one period, style and scale, whilst Albert Gate has a mixed townscape. In particular this is typified by ground floor retail uses along busy thoroughfares (Knightsbridge/Brompton Road), with larger scale, late-Victorian buildings in the Albert Gate CA).

*Example of large-scale blocks*



*Knightsbridge Green*



- 1.8** Of great importance to the character of all three CAs is their setting with Hyde Park/Kensington Gardens to the north. The park provides a backdrop to each CA, forming a green edge.

*Knightsbridge from Hyde Park*



*Hyde Park from Kensington Road*



## Sub-objective 1.2 Ensure business developments respond to local character

### **POLICY KBR2: COMMERCIAL FRONTAGES, SIGNAGE AND LIGHTING**

- 1.9** Knightsbridge is designated by WCC as an International Shopping Centre<sup>2</sup> which means that it has an ‘international reputation’ and ‘attracts global visitors’<sup>3</sup>. Despite this international role, the area manages to retain a distinctive ‘village’ essence bringing together parkland, institutions and high end shopping surrounding the residential area. It’s this strong sense of area, identifiable as ‘Knightsbridge’, which local people wish to retain; Knightsbridge should be recognisable as Knightsbridge to all those entering the area. This is largely achieved through the easily identifiable, iconic buildings, the distinctive heritage features and layout of the area. During the engagement discussions on the Plan, however, it emerged that many people felt that the Knightsbridge essence is being eroded, particularly as a result of an increasing number of poorly designed commercial frontages that are not in-keeping with the surrounds and hence making the Area more generic and less identifiable as Knightsbridge.
- 1.10** There is a significant range and number of commercial business premises operating in the Area, ranging from shops to offices to bars, cafés, restaurants and clubs. The largest concentration is along Brompton Road but there are significant clusters of business premises along the other main routes such as Knightsbridge. There is some further isolated provision elsewhere across the Area. Businesses in the Area should be encouraged to contribute towards the international reputation that Knightsbridge has.
- 1.11** With such a large number and type of different businesses operating across the Area, however, inevitably there is a wide range of design quality of these premises. In particular, the quality of design of their frontages and associated signage varies considerably. Whilst there is a Supplementary Planning Guidance (SPG) at the Westminster level on design, it is 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 that SPG. There is a need 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.
- 1.12** This policy therefore seeks to ensure that design aspects relating to commercial properties are in keeping with the character of the Area. It conforms to London Plan Policy 7.4 (Local character) and is consistent with Westminster UDP Saved Policies DES5 (Alterations and extensions) and DES8 (Signs and advertisements).
- 1.13** The application of this policy can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

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<sup>2</sup> The London Plan refers to this area as an ‘International Retail Centre’

<sup>3</sup> Westminster City Plan glossary

*Examples of shop fronts not in keeping*



**1.14** Westminster UDP Saved Policy DES5 (Alterations and extensions) provides general policy guidance for new shopfronts and Saved Policy DES8 (Signs and advertisements) does the same for signage and lighting. In addition, WCC's SPG on 'Shopfronts, blinds and signs' provides more detailed guidance. However, in light of the importance of these shopfronts to Knightsbridge's role as a prime retail and commercial centre, it is considered that guidance should be brought into policy to provide clear direction on the design of new commercial development and ensure that new shopfronts represent high quality frontages. The Conservation Area Appraisal provides further guidance relating to shopfronts in the Conservation Areas and it is considered that this guidance should be more widely applied in terms of the principles it promotes. Common features of high quality design of shopfronts and signage include:

- high quality signage from sustainable materials (as opposed to plastic signage);
- retention of pilasters and cornicing;
- lighting involving the latest relevant British standard for energy efficiency; and
- clear display of property address number.

*Examples of shop fronts that are in keeping*



### Sub-objective 1.3 Restore heritage features

#### **POLICY KBR3: BOUNDARY RAILINGS AND WALLS**

- 1.15** Boundaries have featured prominently throughout the history of Knightsbridge with many walls and railings from the original estates still remaining today. The engagement process revealed that the preservation and enhancement of these distinctive historic features of properties in Knightsbridge is considered important by residential stakeholders. It was felt that this would not only make it a more attractive place to live but also help to make it more attractive to others, helping to further define the essence of what makes Knightsbridge special and distinct from neighbouring areas. Many people felt that new developments should be in keeping with the historic features or heritage of the area, for instance refurbishing boundary features that had deteriorated or ensuring that new ones reflected the surrounding context.

#### *Examples of historic boundary walls in the area*



*Poorly maintained heritage wall in RBKC in Ennismore Gardens Mews*



- 1.16** This policy seeks to safeguard existing heritage railings, walls and piers and ensure that any new ones are in keeping with the character of the Area. It conforms to London Plan Policies 7.4 (Local character), 7.5 (Public realm), 7.6 (Architecture), 7.8 (Heritage assets and archaeology); and is consistent with Westminster UDP Saved Policy DES7 (Townscape management).

- 1.17** In particular it provides additional local detail to Westminster's policy on Townscape Management, to ensure that developers are guided in the design of boundary railings and walls that are so distinctive in Knightsbridge. For Knightsbridge, it is the style, scale, colour and use of materials that make these heritage features so locally distinctive particularly within the Conservation Areas. There are examples of poorly maintained heritage features that should be restored, and also gaps where any new features should reflect the surrounding context. Details such as the use of wood for plaques and other signage as opposed to plastic and the retention of cornicing and pilasters contribute to this essence of Knightsbridge.
- 1.18** The application of this policy can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

#### **POLICY KBR4: PUBLIC REALM AND HERITAGE FEATURES**

- 1.19** 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 and tattiness. Additionally, there was a desire to reduce street clutter and generally ameliorate the public realm. This policy seeks to do just that, ensuring that replaced heritage features are in keeping with the character of Knightsbridge. It conforms to London Plan policies 7.4 (Local character), 7.5 (Public realm), 7.6 (Architecture), 7.8 (Heritage assets and archaeology); and is consistent with Westminster UDP Saved Policy DES7 (Townscape management), adding further detail at the Knightsbridge level. Conserving the character of Knightsbridge was a fundamental principle supported throughout the engagement with local stakeholders.

- 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 lights and street furniture (e.g. scratched paintwork). In particular Cheval Place, Raphael Street and Knightsbridge Green were felt by the community to have been much neglected.

*Examples of missing heritage street lights and poor quality electrical cabinets*



- 1.21** Problems of poor public realm maintenance are often exacerbated by poor street cleansing and poor rubbish collection arrangements. The use of tarmac in recent years has contributed to this, eroding the local character of the area.

*Examples of poor public realm between the Bulgari Hotel and Scotch House Corner*



*Example of a pavement that has been well maintained*



**1.22** For paving, whilst the policy does not prescribe specific materials, thick York stone<sup>4</sup> (or product of an equivalent high quality natural finish) is a good example of what might be used around the squares in the Area and elsewhere. Thick natural quality materials are preferred and these should also be laid alongside small granite setts. Granite setts or kerbs should ideally be used wherever possible along roads. For roadways, cobbles should preferably be used in the mews and tarmacadam in other streets. For avoidance of doubt, the mews roads are:

- Ennismore Mews
- Ennismore Gardens Mews
- Gate Mews (part)
- Jay Mews (part)
- Montpelier Mews (part)
- Prince's Gate Mews (part)
- Relton Mews

*York stone in need of repair in Montpelier Square*



<sup>4</sup> The thickness should be approximately 10cm to withstand the weight of HGV lorries

**1.23** While a few original heritage lights remain, many are missing, broken and in need of repair or replacement. New lighting solutions should use the latest technology to minimise energy use and future-proof them. Residents have expressed a preference for the round-shaped light fittings along residential roads, and square-shaped street 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 lamps to ensure, for instance, that they do not encroach on upper floor windows in smaller residential roads.

*Example of a round-shaped heritage street light*



*Example of a square-shaped heritage street light*

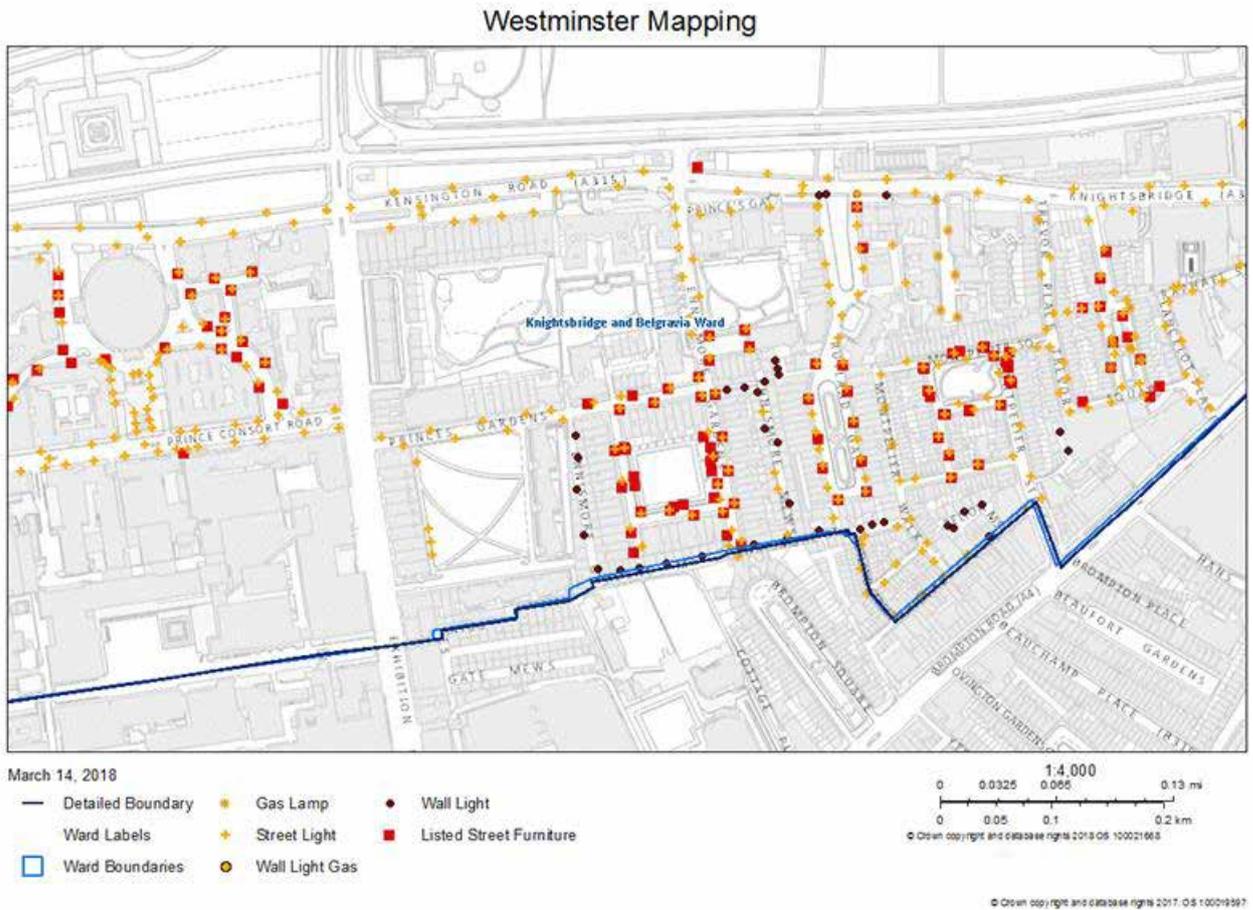


*Example of how the height of a new light can impact on upper floor windows*



It should be noted that some of the street lighting in the Neighbourhood Area is listed and therefore controlled/protected through the planning system. Figure 2 shows the location of street furniture that has been listed by Historic England, such as street lighting columns and wall mounted street lighting units.

**Figure 2: Location of listed street furniture**



**1.24** Transport for London’s (TfL) Streetscape Guidance, referenced in the policy, provides advice on finding the right combination of materials and using leading-edge design to create streets and public spaces that are functional and safe, and which enhance the quality of people’s lives. It forms part of a Streets Toolkit that focuses on improving the urban environment, cycle infrastructure and accessibility.

*Poor use of public realm: Knightsbridge Green and Raphael Street*



**1.25** Development also provides the opportunity to explore whether electrical cabinets can be included within buildings or placed underground. This would reduce street clutter, that is often unsightly, and increase accessibility. As with all street furniture, if these cabinets must be placed on the street, then they must be in keeping with the character of the area, not block public highways and be properly maintained and removed when redundant. This concept is supported in the Westminster Way (SPD 2011) which seeks to avoid cluttering the centre of pavements.

*Examples of street clutter*



**1.26** In addition, there are a number of modern phone boxes in Knightsbridge which are unused, in a poor state of repair, provide a poor environment and clutter the pavement. Whereas the original style of red 'heritage phone box' adds to the street scene because of its heritage features, the modern phone boxes detract from the public realm.

**1.27** It is proposed that the following modern phone boxes be removed:

- 180 Queen's Gate
- 4A Montpelier Street
- 100 Brompton Road
- Montrose Court
- On corner of Prince Consort Road and Queen's Gate (two phone boxes)
- Exhibition Road
- Lancelot Place (two phone boxes)
- Knightsbridge (two phone boxes)

**1.28** It is important that, if modern phone boxes are removed, then they are not replaced by new ones. Also, for all phone boxes it is important that advertising in them is restricted as this detracts from the street scene. Equally, where bus shelters are removed, these should not be replaced by advertising, which has happened on numerous occasions.

*Modern phone boxes outside 4A Montpelier Street and Montrose Court*



**1.29** The application of this policy can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

#### Sub-objective 1.4 Protect important views and properties

### **POLICY KBR5: LOCAL BUILDINGS AND STRUCTURES OF MERIT**

- 1.30** Historic England suggests that there may be many buildings and sites in a local planning authority's area that make a positive contribution to its local character and sense of place because of their heritage value. Although such heritage assets may not be nationally designated or even located within the boundaries of a conservation area, they may be offered some level of protection by the local planning authority identifying them on a formally adopted list of local heritage assets. This policy aims to do just that and conforms to London Plan Policy 7.8 (Heritage assets and archaeology); and WCP Policies S11 (Royal Parks), S25 (Heritage). It is consistent with Westminster UDP Saved Policy DES9 (Conservation Areas).
- 1.31** Whilst a local listing provides no additional planning controls, the fact that a building or site is on a local list means that its conservation as a heritage asset is an objective of the NPPF and a material consideration when determining the outcome of a planning application. The buildings and structures of merit included in the policy were identified as part of the Plan engagement process and the reasons for their inclusion is set out in the tables below, based on the guidance and categorisation provided by Historic England.
- 1.32** The application of this policy can contribute towards the achievement of SDG11: Make cities and human settlements inclusive, safe, resilient and sustainable.

*4 Montpelier Street, formerly the Montpelier Mineral Water Works*

Photograph	Asset Details	Description
	<p><b>Address:</b> 4 Montpelier Street, London SW7</p> <p><b>Significance:</b> Rarity; Aesthetic interest; Historical Interest; Social and community value.</p> <p><b>Asset type:</b> Building or group of buildings</p>	<p>The former site of the Montpelier Mineral Water Works, the markings on the front of the building provide an historic record of its former role in the area. Dating to the late 19th century, the building constitutes a reminder of a more industrial past in this part of London.</p> <p>The company used Codd bottles for its product, which were the first containers to use a rubber washer and marble system of sealing the bottle as opposed to cork.</p> <p>Little about the company survives today, but the building is felt to be an important remnant of the local industrial history of the area worthy of protection.</p>

*122 Brompton Road, formerly the Soldiers and Sailors Help Society*

Photograph	Asset Details	Description
	<p><b>Address:</b> 122 Brompton Road, London SW3</p> <p><b>Significance:</b> Archival interest; Historical Interest; Social and community value.</p> <p><b>Asset type:</b> Building or group of buildings</p>	<p>The Soldiers and Sailors Help Society was an organisation set up in 1899 to support the welfare of British soldiers and sailors both during their service and afterwards. Her Royal Highness Princess Christian, Queen Victoria's third daughter and a founder of the Red Cross, was the Society's first President.</p> <p>It received its Charter of Incorporation in 1901 and, following the creation of the Royal Air Force, the Society became the Incorporated Soldiers' Sailors' and Airmen's Help Society. The Society was the precursor to what is known today as the Forces Help Society. 122 Brompton Road was the Headquarters of the Society although there were branches all over the British Isles and abroad.</p> <p>The Society supported many thousands of servicemen and women, for instance supporting them in starting new businesses, helping out when a service person was unwell or contributing to the cost of funerals.</p> <p>Whilst the role of the building has changed, it still bears the markings that commemorate its former role.</p> <p>The building provides a valuable reminder of its military past which would have been a focal point for many in Knightsbridge.</p>

*Hole-in-the-Wall, Rutland Mews East/Rutland Street*

Photograph	Asset Details	Description
	<p><b>Address:</b> Rutland Mews East/Rutland Street, London SW7</p> <p><b>Significance:</b> Archival interest; Historical interest; Social and community value.</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Historically the area between Hyde Park and Knightsbridge was split into two great estates with a wall separating them. It is estimated that the wall was constructed in the 1850s, as maps prior to this do not show the barrier.</p> <p>The wall was demolished by a bomb during World War II on 25 September 1940, which whilst a loss, meant that residents could eliminate the long detour when walking to Knightsbridge.</p> <p>After the war, the wall was replaced but local residents petitioned to keep a right of way through it, hence the ‘Hole in the Wall’ as it is known came to be. The City of Westminster installed a small sign next to the wall in 1998 with the wording:</p> <p><i>“This boundary wall of the Rutland Estate was destroyed by a bomb, during World War II, on 25 September 1940. At the request of residents a right of way was established when the wall was rebuilt by the City of Westminster in 1948 and has come to be known as ‘the hole in the wall.’”</i></p>

*The Statue at 1 Knightsbridge Green*

Photograph	Asset Details	Description
	<p><b>Address:</b> 1 Knightsbridge Green, London SW1X 7NE</p> <p><b>Significance:</b> Architectural; Archival interest; Aesthetic interest; Historical interest; Social and community value.</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>The original building (No. 1 Knightsbridge Green and Nos 44–58 Brompton Road), was designed by Stone, Toms &amp; Partners for Edger Investments Limited (a subsidiary of the Alliance Assurance Company), and built in 1955–7 by Sir Robert McAlpine &amp; Sons Limited. It has since been reconstructed.</p> <p>Occupying the site of the former Tattersalls’ auction yard and adjoining properties, the building incorporates Tattersall’s Tavern.</p> <p>It is the sculpture, however, a 30ft high group of three rearing horses that sits atop the ground floor retail units, which gives it its unique heritage interest. ‘Triga’ by Franta Belsky, a Czech-born sculptor, was erected in the 1960s and recalls the racehorses that were bought and sold on this site while it was occupied by Tattersalls’ auction yard for almost 75 years. It is made of reinforced concrete with a coating.</p> <p>As he did in all his creations, Belsky placed an empty Guinness bottle, the day’s newspaper, a sixpence and a note stating that he was the artist, within the sculpture.</p> <p>The statue represents a valuable insight into the past industry of the area and is felt to be worthy of safeguarding for the future.</p>

## Heritage telephone boxes

Figure 3 shows the phone boxes on a map (page 25).

**Description of table below:** These are K Series phone boxes. The K6 kiosk is identified as Britain's red Telephone Box; in fact eight kiosk types were introduced by the General Post Office between 1926 and 1983. The K6 was designed by Sir Giles Gilbert Scott to commemorate the Silver Jubilee of the coronation of King George V in 1935.

Some 60,000 examples were installed across Britain, which is why the K6 has come to represent the red Telephone Box. Over 11,000 K6s remain and they are the most visible examples of the eight kiosk types.

Telephone boxes are an important part of the townscape due to their function but also as they act as local landmarks and way finding features because their iconic design is so recognisable.

Photograph	Asset Details
<p>REF: Phone box 1</p> 	<p>Address: Kensington Road</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>
<p>REF: Phone box 2</p> 	<p>Address: Royal College of Music, Prince Consort Road</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>
<p>REF: Phone box 3</p> 	<p>Address: Prince of Wales Gate</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>

Photograph	Asset Details
<p>REF: Phone box 4 (left)</p> 	<p>Address: 126 - 128 Brompton Road</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>
<p>REF: Phone box 5 (right)</p> 	<p>Address: 126 - 128 Brompton Road</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>
<p>REF: Phone box 6 (left)</p> 	<p>Address: Knightsbridge Green</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>
<p>REF: Phone box 7 (right)</p> 	<p>Address: Knightsbridge Green</p> <p>Significance: Archival interest; Historical interest; Townscape interest</p> <p>Asset type: Street feature or other structures</p>

## Heritage post boxes

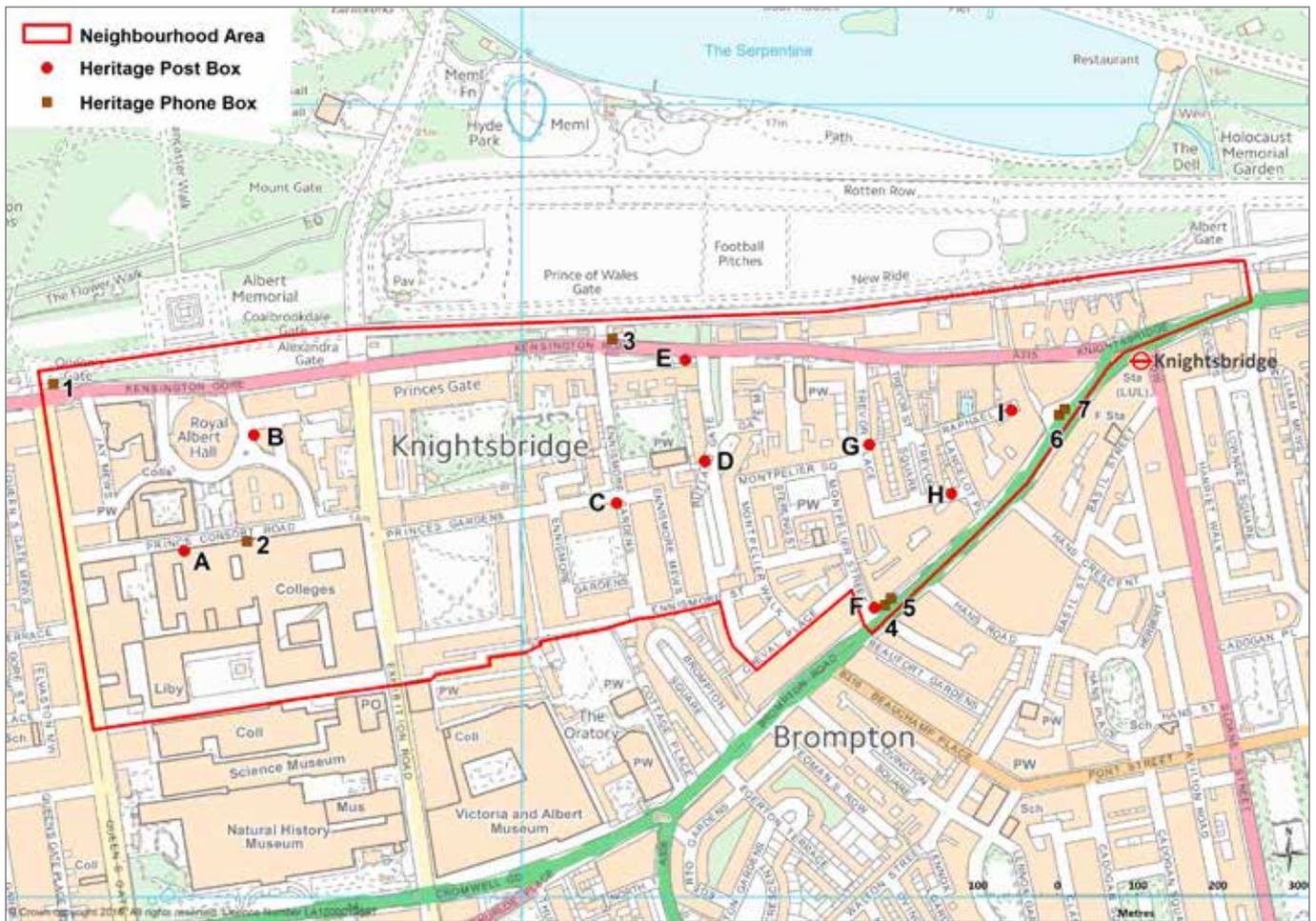
Figure 3 shows the post boxes on a map (page 25).

Photograph	Asset Details	Description
<p>REF: Post box A</p> 	<p><b>Address:</b> Prince Consort Road</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a ‘standard’ approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is an Elizabeth II pillar box, identified by the ornate lettering cast into the door ‘E II R’ which is set below a crown. This particular box is one of the first castings of the 1980 ‘K’ pillar box.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>
<p>REF: Post box B</p> 	<p><b>Address:</b> Kensington Gore</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a ‘standard’ approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is an Edward VII pillar box, identified by the ornate lettering cast into the door ‘ER VII’ which is set below a crown.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>

Photograph	Asset Details	Description
<p>REF: Post box C</p> 	<p><b>Address:</b> Ennismore Gardens</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a ‘standard’ approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is an Edward VII pillar box, identified by the ornate lettering cast into the door ‘ER VII’ which is set below a crown.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>
<p>REF: Post box D</p> 	<p><b>Address:</b> Rutland Gate</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a ‘standard’ approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This particular pillar box has no cipher.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>
<p>REF: Post box E</p> 	<p><b>Address:</b> Kensington Road</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a ‘standard’ approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is a Victorian pillar box, identified by the ornate lettering cast into the door ‘VR’.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>

Photograph	Asset Details	Description
<p>REF: Post box F</p> 	<p><b>Address:</b> Montpelier Street</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a 'standard' approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base.</p> <p>This is an Edward VII pillar box, identified by the ornate lettering cast into the door 'ER VII' which is set below a crown. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>
<p>REF: Post box G</p> 	<p><b>Address:</b> Trevor Place</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a 'standard' approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is an Edward VII pillar box, identified by the ornate lettering cast into the door 'ER VII' which is set below a crown.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>
<p>REF: Post box H</p> 	<p><b>Address:</b> Trevor Square</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a 'standard' approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is a black Edward VII pillar box, set into the wall, identified by the ornate lettering cast into the door 'ER VII' which is set below a crown.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>
<p>REF: Post box I</p> 	<p><b>Address:</b> Raphael Street</p> <p><b>Significance:</b> Archival interest; Historical interest; Townscape interest</p> <p><b>Asset type:</b> Street feature or other structures</p>	<p>Following their introduction to Britain in 1852, pillar boxes (letter boxes) have over the years had a variety of different designs, changing in colour, size, shape and features with several attempts being made to establish a 'standard' approach. In 1879 a standard design was introduced taking the form of a cylindrical pillar with a round cap and horizontal aperture under a protruding cap with front opening door and black painted base. Whilst other designs have been trialled since, this distinctive design has stood the test of time.</p> <p>This is an Elizabeth II pillar box, identified by the ornate lettering cast into the door 'E II R' which is set below a crown.</p> <p>Pillar boxes are an important part of the townscape due to their function but also as they act as a local landmark and way finding feature because their iconic design is so recognisable.</p>

Figure 3: Location of heritage telephone boxes and post boxes



Sub-objective 1.5 Resist tall buildings inconsistent with local scale

**POLICY KBR6: TALL BUILDINGS**

**1.33** The development of tall buildings – defined in the London Plan as ‘buildings substantially taller than their surroundings’ - is a London-wide consideration, particularly given the housing shortage, but could have very different impacts depending on the location. Paragraph 7.25 of the London Plan states that tall buildings can have a significant detrimental impact on local character. Notably, the WCP states that on the whole Westminster is an unsuitable location for tall buildings, with no locations in the Knightsbridge Neighbourhood Area identified by the WCP as being suitable for tall buildings. The WCP Plan notes at paragraph 5.6:

*‘In the right places, tall buildings – those which are significantly taller than their neighbours – can make a positive contribution to the London skyline. In the wrong place, they can be very damaging to cherished views of great heritage importance and the character of local areas. One of the key characteristics of Westminster is its human scale. Most buildings are less than six storeys high, even in commercial areas. Much of Westminster is inappropriate for the development of tall buildings because of their adverse impact on character and local distinctiveness of areas, and on important views.’*

**1.34** It is worth noting that between March and May 2017, the City Council undertook a consultation on building heights across the City, with a view to informing a more nuanced approach to growth in different parts of Westminster. The results of this consultation, which took the form of a questionnaire around principles, definitions and different localities around the city, are awaited. It is anticipated that following the publication of the consultation responses, a draft policy is likely to emerge addressing buildings heights, tall buildings and growth more generally across the City, potentially revising the current approach. This is likely to be part of the revision to the City Plan which has commenced.

**1.35** Within Knightsbridge, the general height of buildings is comparatively low. With the exception of the solitary Peninsula Tower and 100 Knightsbridge (also known as One Hyde Park), typically, the observed heights of buildings in Knightsbridge are as follows:

- Houses around squares – three to five storeys over basements. Trevor Place/Montpelier Square are one type; Rutland Gate is a different style.

*Trevor Place*



*Montpelier Square*



### *Rutland Gate*



- Residential mews – two storeys. Ennismore Gardens Mews is a particularly well-preserved example.

### *Ennismore Gardens Mews*



**1.36** In the western part of the Area, buildings are typically taller, ranging from six to ten storeys e.g. Eresby House, Rutland Gate, and Prince's Gate, 59-63 Exhibition Road. This includes the mansion blocks e.g. Albert Hall Mansions. The Strategic Cultural Area has a different character to the wider Area with buildings west of Exhibition Road being typically of a larger scale. However, there are recent examples where major new development proposals in the cultural area, including some large buildings, have been successfully delivered in highly sensitive and constrained heritage settings. This demonstrates the importance of good design.

### *Prince's Gate residences*



### *Albert Hall Mansions*



- 1.37** Building height and massing was mentioned frequently throughout the engagement. In particular, 100 Knightsbridge (also known as One Hyde Park) was noted by many stakeholders as an example of a tall building that has had a detrimental impact on local character.

*One Hyde Park as an example of a building that dominates the local skyline*



- 1.38** The most obvious reason for this is that, wherever one stands around the junction of Scotch House Corner or down Brompton Road, 100 Knightsbridge is visually overpowering, taking away the essence of Knightsbridge that exists elsewhere. Its impact is exacerbated by the fact that the building extends out close to the original boundary of the site, beyond the previously existing building line. A further issue with the site, which is relevant in the Hyde Park Quarter, is the impact that the building has on the openness of the Metropolitan Open Land (MOL). Attention is drawn in this regard to London Plan Policy 7.17 on MOL which restricts development from having this type of adverse impact. Now that the building is in place, it is obvious that the openness of the MOL has been adversely affected. 100 Knightsbridge is considered to be an example of a building that is out of character with the surrounding area and provides clear design cues that should be avoided in future developments.
- 1.39** The other tall building of note in the Area is the solitary Peninsula Tower, which forms part of the Hyde Park Barracks. Whilst this has received a mixed reception from local people, largely because of its height, it is nonetheless regarded as being a feature of metropolitan historic value. It sits outside of the designated proposals site for the barracks, and as such there is no presumption for its redevelopment.

*View across Knightsbridge, showing relatively low level of building heights*



- 1.40** Conservation Area status has assisted in maintaining the largely low-level building heights – and the associated views these allow - across the Area. Saved Policies DES3 (High buildings) and DES15 (Metropolitan and local views) of the Westminster UDP provide clear guidance on the need for tall buildings to not have an adverse impact upon the character and setting of Conservation Areas or on metropolitan or local views. Policy DES3(C) states that high buildings may be exceptionally permitted on the basis of Policy DES3(B) *‘shall contribute to the improvement or the regeneration of the locality within which they would be sited.’* For Knightsbridge, this criterion is particularly important given that a large proportion of tall buildings are for predominantly residential uses, such as 100 Knightsbridge, and these high rise residential developments are sold on the basis of their value to high net worth investors, many of whom leave them empty or live in them for only a few weeks per year. The proliferation of larger empty properties is considered by the community of Knightsbridge to be having a detrimental impact on the locality.
- 1.41** The focus on housing is an important one given the significant need for new housing and a central focus for planning in London is the optimisation of the development potential of sites. The Mayor’s Housing SPG states that, *‘for the purposes of the Plan, ‘optimisation’ can be defined as ‘developing land to the fullest amount consistent with all relevant planning objectives’*. Therefore, the challenge in Knightsbridge is to justify the scale of development against the wider objectives. Taller buildings are generally unacceptable when the other benefits they bring do not outweigh the harm associated to building height. In this context, one of the key considerations which must be given the greatest weight in decision-making is the need to avoid harm to the townscape views across the Neighbourhood Area and beyond and to all heritage assets, including local buildings and structures of merit (addressed in Policy KBR5).
- 1.42** Given the detrimental impact that 100 Knightsbridge in particular has had on the Area, this policy seeks to provide guidance that will restrict the development of further tall buildings in the Area unless they can be shown to be sympathetic to their surroundings. The policy conforms to London Plan Policies 7.7 (Location and design of tall and large buildings) and 7.8 (Heritage assets and archaeology); and WCP Policies S25 (Heritage) S26 (Views); and is consistent with Westminster UDP Saved Policies DES3 (High buildings) and DES9 (Conservation Areas).
- 1.43** The application of this policy can contribute towards the achievement of SDG11: Make cities and human settlements inclusive, safe, resilient and sustainable.

## 2 OBJECTIVE 2.0 — IMPROVE THE PUBLIC REALM AND ENHANCE AND RESTORE HERITAGE FEATURES

Sub-objective 2.1 Promote high quality streets, pavements, paths and publicly accessible open spaces that meet the needs of local people while supporting the high volumes of workers, students and visitors

### POLICY KBR7: PEDESTRIAN MOVEMENT ALONG, ACROSS AND ADJACENT TO THE HIGHWAY NETWORK

- 2.1 Encouraging and improving the pedestrian experience of moving around the area to incentivise walking and exploration was a common theme in the engagement process. This policy seeks to improve pedestrian movement and safety along specific locations within the Area including residential areas such as Knightsbridge Green, Lancelot Place and Montpelier Street and also the main roads including Brompton Road, Exhibition Road, Kensington Road, Kensington Gore, Knightsbridge, Prince Consort Road and Queen's Gate. The policy conforms to London Plan Policy 6.10 (Walking); and is consistent with Westminster UDP Saved Policies TRANS3 (Pedestrians) and TACE11 (Tables and chairs on the footway).
- 2.2 Business owners in particular said, during the engagement phase, that they would like to see public realm improvements e.g. those creating more space for pedestrians. They also said that all streetscapes should be kept clean, accessible and visually well presented. Furthermore, there should be sufficient pedestrian crossings and appropriate levels of street lighting and CCTV.

#### *Difficulties crossing Brompton Road*



- 2.3 Westminster's policy TACE11 seeks to minimise obstruction caused by tables and chairs on pavements. This is particularly relevant to the Area as an audit undertaken in February 2014 by the Knightsbridge Association of the number of tables and chairs outside premises along Brompton Road illustrated that such provision is very common and restricts the natural pedestrian flows at regular intervals. The audit revealed that the average number of chairs and tables per premises along the Brompton Road was nine and four respectively. This is particularly hazardous for pedestrians as the Brompton Road is a red route, part of the TfL Road Network.

- 2.4** The application of this policy can contribute towards the achievement of SDGs 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

*Tables and chairs create a hazard with bikes, Brompton Road*



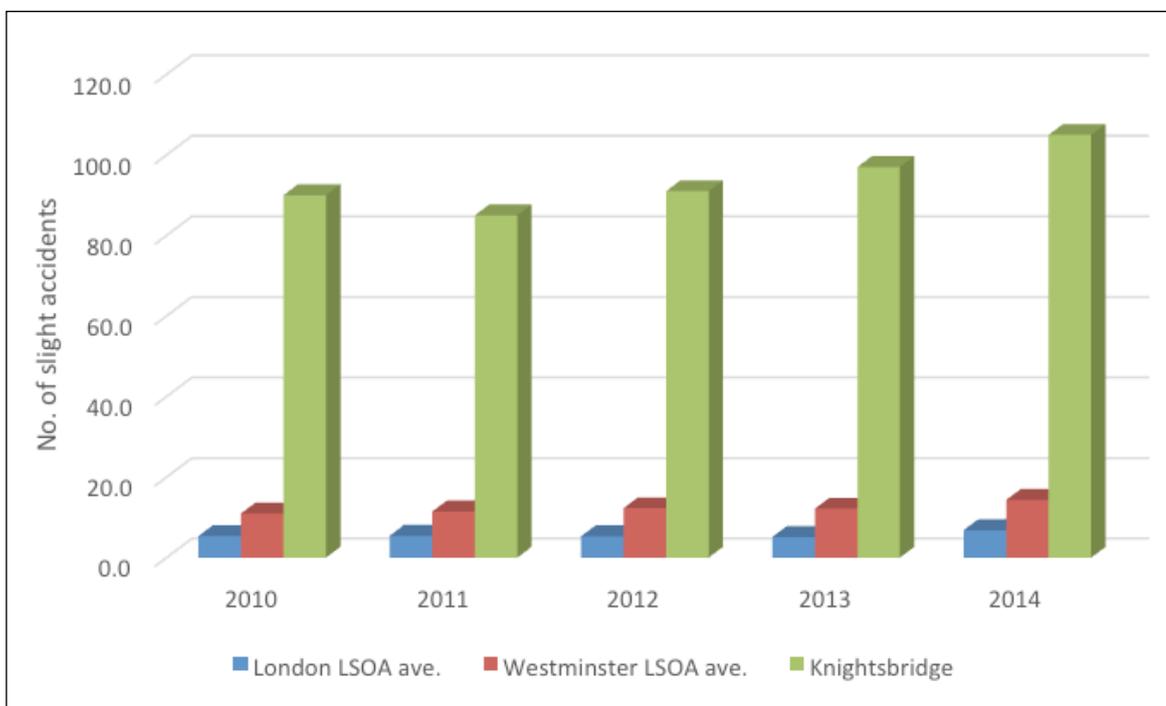
- 2.5** The Forum is supportive of measures that would increase footway space along and around the Main Roads in the Area provided that they do not worsen traffic congestion. This would focus on those areas where there is significant pressure such as at pedestrian crossings, bus stops and Local Road junctions.

*Congestion on Brompton Road*



2.6 Figures 4 and 5 illustrate that Knightsbridge is significantly above the averages for both Westminster and London as a whole when it comes to slight and serious collisions involving motor vehicles.

**Figure 4: Slight accidents involving motor vehicles, London Data Store**



**Figure 5: Serious accidents involving motor vehicles, London Data Store**



- 2.7** Many of these collisions are in the east of the Area where Brompton Road and Knightsbridge come together at Scotch House Corner, which is where pedestrian movement is particularly high. Moreover, these injuries are also noticeably regular near pedestrian crossings and at road junctions where there is no dedicated crossing facility; Lancelot Place (opposite Harrods) is one such example. The Brompton Road/Beauchamp Place intersection in RBKC is another example of where a crossing is needed. Casualties include pedestrians, cyclists and motorists including motorcyclists.
- 2.8** An important part of the Area where traffic management is an issue that requires ongoing attention is in the Strategic Cultural Area, particularly around Exhibition Road and Prince Consort Road. The proposed Albertopolis scheme would ameliorate the situation by facilitating pedestrian movement. However, it is vital that an appropriate balance is struck between the competing demands of all road users and to reduce the opportunity for rat running by cars, vans, taxis and private hire vehicles in Local Roads. This balance should take account of the need to maintain convenient access for local residents whilst managing the high numbers of trips generated by the high profile cultural, education and research uses within the Strategic Cultural Area.
- 2.9** The benefits of giving greater priority to pedestrians whilst not adversely impacting on the operational requirements of the cultural, education and research institutions or on the need for residents to have access to their homes should be explored. Vertical physical calming measure such as speed humps are not considered appropriate. Copenhagen crossings at road junctions work by blending the pavement into the road to signal to drivers that they are entering a pedestrian area where they must allow pedestrians and cyclists to move. These are strongly supported.
- 2.10** The application of this policy can contribute towards the achievement of SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

## Sub-objective 2.2 Substantially improve the street appearance

### **POLICY KBR8: ADVERTISING**

- 2.11** Some buildings within or near the Area have been obscured, at least on a temporary basis, by very large advertising signs that do not relate to building works. These signs can spoil the enjoyment of the very features that have afforded them heritage status in the first place. The same principle applies to advertising inside or outside telephone boxes.

#### *Telephone boxes with excessive advertising*



- 2.12** The design and consideration of advertising should follow the guidance provided in the Westminster Advertising Design Guidelines Supplementary Planning Guidance document as well as the 'Westminster Way' public realm strategy Supplementary Planning Document.
- 2.13** This policy conforms to paragraph 67 of the NPPF; policy 7.4 (Local character) of the London Plan; and is consistent with Westminster UDP Saved Policy DES8 (Signs and advertisements).
- 2.14** The application of this policy can contribute towards the achievement of SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

### Sub-objective 2.3 Improve roofscapes

#### **POLICY KBR9: ROOFSCAPES AND BALCONIES**

- 2.15** As noted in Policy KBR6, concerns were raised during the engagement process about the detrimental impact an increase in built height would have on the physical character of the Conservation Areas and also the impact to the amenity of neighbours through overshadowing/loss of light and loss of privacy. In addition, because the height of buildings across the Area is generally low, items such as mechanical plant and equipment, including aerials, on roofs and balconies can often be very visually intrusive.
- 2.16** Many residents in the Area have small roof terraces and these spaces play an important role in everyday life, particularly during the spring and summer months. The view out onto the surrounding roofscape is therefore an important one to protect and some people were concerned that the proliferation of aerials and other roofscape ‘clutter’ should be reduced. In addition, any new balconies or roofscape extensions should not intrude visually onto surrounding properties. Residents felt that this would add to the quality of life for residents, one of the core values underpinning the Plan.
- 2.17** It is important therefore that planning permissions include clear conditions which restrict certain types of plant and machinery and that these are enforceable over the lifetime of the use of the development in question. One example where this has been successful is at Gabor Hall, Linstead Hall and/or Wilkinson Hall in Prince’s Gardens. The planning permission has a series of conditions that do not permit plant, machinery or telecommunications equipment on the roof apart from those in the approved drawings.
- 2.18** The same principle should apply to balconies as well as roofs. In the Prince’s Gardens example, a restriction was applied which prevents the placement of canopies, fences, loggias, trellises and satellite or radio antennae on balconies.
- 2.19** This policy therefore seeks to ensure that development at roof and balcony level is not out of keeping with the prevailing roofline and minimises its negative impact on neighbouring properties. It is consistent with Westminster UDP Saved Policy DES6 (Roof level alterations and extensions), adding a more local dimension for Knightsbridge.
- 2.20** The application of this policy can contribute towards the achievement of SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

## Sub-objective 2.4 Facilitate urban greening

### **POLICY KBR10: URBAN GREENING**

- 2.21** The engagement process revealed strong support for providing pockets of green space within development, for instance green walls, green roofs, trees, grass areas, flower baskets or troughs and the creation of multi-functional green roofspaces. This policy therefore seeks to encourage the incorporation of planting within new developments and also within redevelopments.
- 2.22** The policy conforms to London Plan Policies 5.10 (Urban greening) and 5.11 (Green roofs and development site environs); and is consistent with Westminster UDP Saved Policy ENV4 (Planting around and on buildings).

*Example of a green roof and a green wall*



- 2.23** The ‘urban forest’ approach, such as in Melbourne, Australia<sup>5</sup>, is seen as an example of good practice in urban greening.

#### **Definition of urban forests**

Urban forests comprise all the trees and other vegetation within an urban area. It incorporates vegetation in streets, parks, gardens, plazas, campuses, river embankments, wetlands, railway corridors, community gardens, green walls, balconies and roofs. Every part of the city contributes in some way to the urban forest as a whole.

In Melbourne, Australia, the City of Melbourne is taking forward an urban forest strategy, the guiding principles of which are to:

- mitigate and adapt to climate change
- reduce the urban heat island effect
- become a ‘water sensitive’ city
- design for health and wellbeing
- design for liveability and cultural integrity
- create healthier ecosystems

<sup>5</sup> <http://www.melbourne.vic.gov.au/community/parks-open-spaces/urban-forest/Pages/urban-forest-strategy.aspx>

- 2.24** Green roofs (also referred to as brown or living roofs) and green walls can provide habitats for wildlife species and valuable green links and stepping stones for animals such as birds and invertebrates. In 2003, English Nature (now Natural England) recognised the potential biodiversity benefits of green roofs as<sup>6</sup>:
- helping to remedy areas of deficiency i.e. providing new habitats in areas which are currently lacking in wildlife habitats;
  - creating new links in an intermittent network of habitats, thereby facilitating movement and dispersal of wildlife; and
  - providing additional habitats for rare, protected or otherwise important species.
- 2.25** Green roofs used in the London area have been identified as being beneficial for rare invertebrates. According to Natural England, a 2002 survey of eight green roofs in the London area recorded a number of uncommon species, including some not previously recorded in the London area. Green roofs can provide a flower-rich habitat for *Bombus humilis* (bumble bees), and this measure has the potential to meet the London Biodiversity Partnership's statement for the species. For birds, research shows that green roofs offer the opportunity to benefit local biodiversity action plan species within London (Black Redstart, House Sparrow) and potentially a number of UK Biodiversity Action Plan priority species including the Skylark.
- 2.26** The importance of green roofs and walls is now increasingly recognised in the UK, including through planning policy. In London, the use of green roofs to help meet policies and targets is encouraged in both the Mayor's Biodiversity Strategy and the London Biodiversity Action Plan. London Plan Policy 5.11 requires major developments to incorporate living roofs and walls where feasible.
- 2.27** The creation of multi-functional green roofspaces is also gaining traction in the UK. As the 'next step' in green roofs, Imperial College London promotes this concept through their Blue Green Solutions: A Systems Approach to Sustainable, Resilient and Cost-Efficient Urban Development<sup>7</sup>. They suggest these spaces perform the functions including:
- a) reducing runoff and urban surface flooding risk;
  - b) improving local microclimate and mitigate UHI (Urban Heat Island effects);
  - c) enable greater energy efficiency;
  - d) providing thermal insulation;
  - e) representing a potential source of revenue – for instance urban agriculture (fish, honey) and flowers; and
  - f) providing a multifunctional green space – for instance gardens for old people to socialise within, employees to spend breaks, local playgroups to explore.
- 2.28** The application of this policy can contribute towards the achievement of SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

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<sup>6</sup> English Nature (2003), Green Roofs: their existing status and potential for conserving biodiversity in urban areas. English Nature Research Reports. Number 498. English Nature, Peterborough.

<sup>7</sup> [https://www.researchgate.net/publication/315756004\\_Blue\\_Green\\_Solutions\\_A\\_Systems\\_Approach\\_to\\_Sustainable\\_Resilient\\_and\\_Cost-Efficient\\_Urban\\_Development](https://www.researchgate.net/publication/315756004_Blue_Green_Solutions_A_Systems_Approach_to_Sustainable_Resilient_and_Cost-Efficient_Urban_Development)

Sub-objective 2.5 Protect and enhance local green spaces

**POLICY KBR11: PROTECTION AND MAINTENANCE OF LOCAL GREEN SPACES**

2.29 This policy designates six areas, identified by the local community as important, as Local Green Spaces. This conforms to paragraph 77 of the National Planning Policy Framework; and London Plan Policy 7.18 (Protecting Open Space and addressing deficiency).

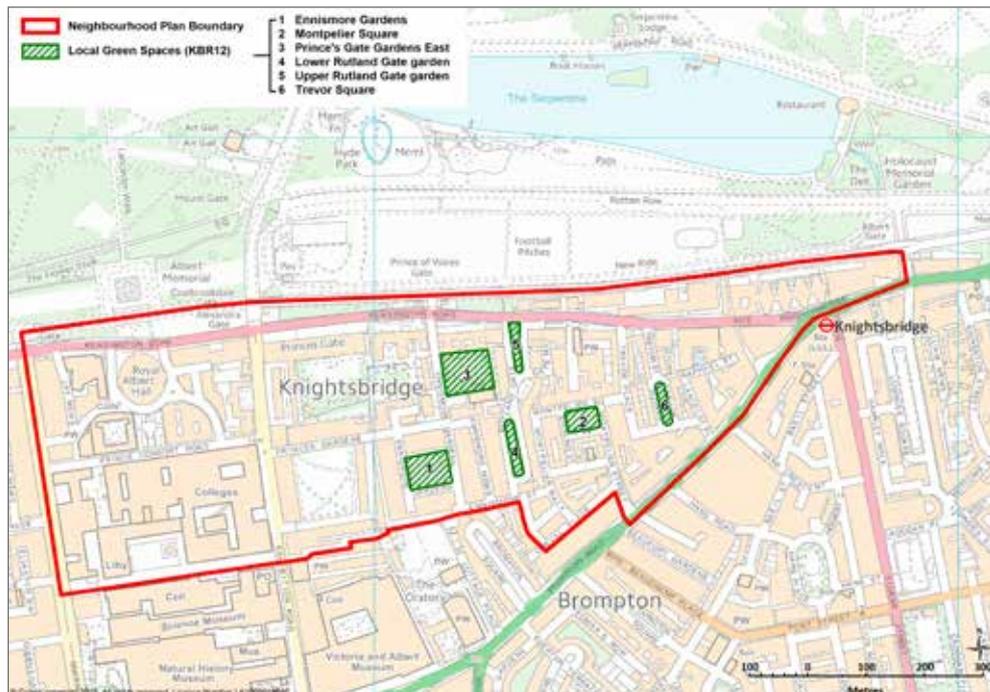
2.30 The application of this policy can contribute towards the achievement of SDGs 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

2.31 The six Local Green Spaces protected, as set out on the Policies Map in the Plan, are:

- 1. Ennismore Gardens
- 2. Montpelier Square
- 3. Prince’s Gate Garden East
- 4. Lower Rutland Gate garden
- 5. Upper Rutland Gate garden
- 6. Trevor Square

2.32 All of the Local Green Spaces are demonstrably special to the community and also the visitors, students and workers of Knightsbridge. Figure 6 shows the Local Green Spaces on a map. A detailed description of each, including how they meet the NPPF Local Green Space criteria, is then provided in the tables below.

**OBJECTIVE 3.0 — Protect and enhance Hyde Park and Kensington Gardens**  
**Figure 6: Local Green Spaces**



## Local Green Space Assessments

Name and address	Description/purpose	Quality of facility
<p>Ennismore Gardens Knightsbridge London SW7 1 AJ Grid Ref: TQ270794</p> 	<p>Garden enclosure bounded on the north by the rear of Nos. 1 to 9 Ennismore Gardens and on the east, south and west by the roadway of Ennismore Gardens.</p>	<p>An award-winning Victorian garden, named after William Hare, Viscount Ennismore and Earl of Listowel, formed part of the gardens and paddocks of Kingston House, which stretched the length of Prince's Gate.</p> <p>The core of the garden, from the beginning, has been fine London plane trees. The present layout of grass, beds and borders, with a few minor changes, has survived for 50 or more years.</p> <p>The garden has a central lawn edged with serpentine paths and dense shrubberies, and is enclosed on three sides by cast-iron railings, punctuated by three pairs of C19th Portland stone gate piers and four C19th corner piers. The garden has been extensively developed and restored over the past 25 years.</p>
<b>Statutory designations Planning permissions</b>		
<p>London Squares Preservation Act 1931.</p> <p>Lies in Knightsbridge Conservation Area.</p> <p>LBII*: Church of the Assumption of All Saints. LBII: North 1-9 &amp; 60-65, 27 lamp standards; south 27-34 &amp; Mews arch adjoining 37; west 10-25; east 39-59; 2 pairs gate piers on west &amp; south, 4 corner piers</p>		
<b>Statutory designations</b>		
N/A		
<b>Planning permissions</b>		
N/A		
<b>NPPF criteria</b>		
<b>Close to the community</b>		
<p>This is a traditional London garden square surrounded by housing. It is accessible by key to local residents of the Square and their guests but does open on special occasions, for instance, Open Gardens.</p>		
<b>Demonstrably special to the local community?</b>		
<p>The garden has historic value. They were built on the site of the former paddocks and gardens of Kingston House built in 1770. Named after William Hare, Viscount Ennismore and Earl of Listowel. It was laid out and enclosed with cast-iron railings by Peter and Alexander Thorne in the late 1870s, after they had built the large houses of the northern, southern and western Portland stone ranges. These, added to the lesser brick-and-stucco houses of 1846-54 built by John Elger, completed the garden square. An urn (a reduced-size replica of one designed by William Kent for Alexander Pope's garden in Twickenham) was erected in memory of actress Ava Gardner, who lived in the first-floor flat at No. 34 for many years. The most recent (2014) addition is a boulder garden of Cornish field stones, laid out below young silver birches. The gardens are a haven for wildlife, attracting birds, insects and small mammals. They also provide a tranquil haven in this part of London.</p>		
<b>Local in character / not extensive tract of land</b>		
<p>Approximately 0.2 ha, nestled among housing.</p>		

Name and address	Description/purpose	Quality of facility
<p><b>Montpelier Square</b> Knightsbridge London SW7 1JY Grid Ref: TQ273795</p> 	<p>Garden enclosure bounded on all sides by the roadway of Montpelier Square. Size: 0.2ha</p>	<p>It is maintained by an elected committee of local residents. Grass is regularly mown and benches are provided for enjoyment. The trees are regularly pruned on a rolling three year cycle with tree surgery taking place every year. Recently there has been evidence of massaria in one of the trees and this is regularly monitored.</p> <p>The garden won the ‘Small Private Square’ category in the London Garden Squares Competition in 2016, the judge praising the ‘outstanding’ quality of the garden. It won the category again in 2017.</p> 

**Statutory designations Planning permissions**

London Squares Preservation Act 1931.

Lies within Knightsbridge Conservation Area.

Administered in accordance with Town Gardens Preservation Act 1863 – garden byelaws in place<sup>8</sup>

LBII: Terrace c.1830 on south side nos. 8-16; early-mid C19th houses on north side nos. 27-43, on east side nos. 1-7; on west side nos. 17-25; 7 C19th cast iron lamp standards.

Area of protected family housing.

**Statutory designations**

N/A

**Planning permissions**

N/A

**NPPF criteria**

**Close to the community**

The garden is surrounded on all four sides by residential properties, public footways and public roads. Access to the garden is restricted and is predominately limited to local residents and their guests.

**Demonstrably special to the local community?**

The main purpose of the garden is to provide recreational space for local residents and as a distinct feature within the local landscape. It is an important area of tranquillity for residents, providing recreational and amenity space. There are benches and tables provided for enjoyment of users. There are 49 trees in the garden which serve to enhance the tranquillity of the space while also providing habitats for birds and other wildlife. It also has historical value: Montpelier Square is a well preserved early C19th garden square with a perimeter hedge and modern railings, shrubs and good trees, and an interesting serpentine path layout. The development was named from Montpelier in France, a name that was intended to evoke images of its fashionable and healthy situation. The small square of some 42 terraced houses surrounds the private communal garden.

**Local in character / not extensive tract of land**

The garden covers approximately 0.2 ha, is predominately flat and is roughly rectangular in shape.

<sup>8</sup> <http://www.montpeliersquare.org.uk/wp-content/uploads/2012/02/ByeLaws.pdf>

Name and address	Description/purpose	Quality of facility
<p>Prince's Gate Garden East Knightsbridge London SW7 2PD Grid Ref: TQ268796</p> 	<p>One of a pair of enclosed garden, formed by the terrace in Prince's Gate and other terraces, in a similar fashion to other London squares.</p>	<p>This is a well-maintained facility.</p>
<b>Statutory designations Planning permissions</b>		
London Squares Preservation Act 1931.		
<b>Statutory designations</b>		
N/A		
<b>Planning permissions</b>		
N/A		
<b>NPPF criteria</b>		
<b>Close to the community</b>		
This is a communal garden serving the residents of Prince's Gate.		
<b>Demonstrably special to the local community?</b>		
<p>The area is special to the community because it provides a green space among the houses at Prince's Gate. It has historical value: Prince's Gate Garden was designed by architect, Sir Charles James Freake. Building began in 1856 on the Park House property. The first houses to be erected were Nos 26–31 Prince's Gate (completing the line of development at Nos 13–25 begun by John Elger on the Kingston House estate, but demarcated from it by a railing and a passageway into the communal garden there).</p>		
<b>Local in character / not extensive tract of land</b>		
Approximately 0.1 ha.		

Name and address	Description/purpose	Quality of facility
<p>Lower Rutland Gate garden Knightsbridge London SW7 1BN Grid Ref: TQ272796</p> 	<p>Private garden enclosure bounded on all sides by the roadway of Rutland Gate. It is a fairly narrow garden in a long dog-legged enclave running off Kensington Road.</p>	<p>The garden is owned and managed by residents of Rutland Gate Terrace<sup>9</sup>.</p>
Statutory designations Planning permissions		
<p>London Squares Preservation Act 1931. Sits within Knightsbridge Conservation Area. LBII: houses in terrace; 12 lamp standards on surrounding pavements.</p>		
Statutory designations		
<p>N/A</p>		
Planning permissions		
<p>N/A</p>		
NPPF criteria		
Close to the community		
<p>This is a traditional London garden square surrounded by residential properties. It is open to the public on special occasions.</p>		
Demonstrably special to the local community?		
<p>Upper and Lower Rutland Gate gardens are two fairly narrow gardens in a long dog-legged enclave running off Kensington Road. They are a haven for flora and fauna with long grass, shrubs and trees including London plane, lime and tree-of-heaven. The gardens have historical value dating to the early C19th, and remaining virtual intact to its original layout. The original piers and railings to Kensington Road survive but have been replaced in some parts for example by fencing and concrete posts. Eresby House, a large 1930s development, occupies a site between the two gardens, and has a trim contemporary forecourt garden. The lower garden comprises a lozenge shaped lawn to the side of a circular raised bed in front of the main entrance gate, with perimeter gravel paths. Between the paths and the boundary of the garden are low raised beds with shrubs and trees, and there are a number of decorative planters. There are 12 C19th lamp standards around the surrounding pavements. The South Garden is owned by residents in the adjacent terrace, who pay an annual sum for maintenance.</p>		
Local in character / not extensive tract of land		
<p>0.13 ha.</p>		

<sup>9</sup> <http://www.londongardensonline.org.uk/gardens-online-record.php?ID=WST098>

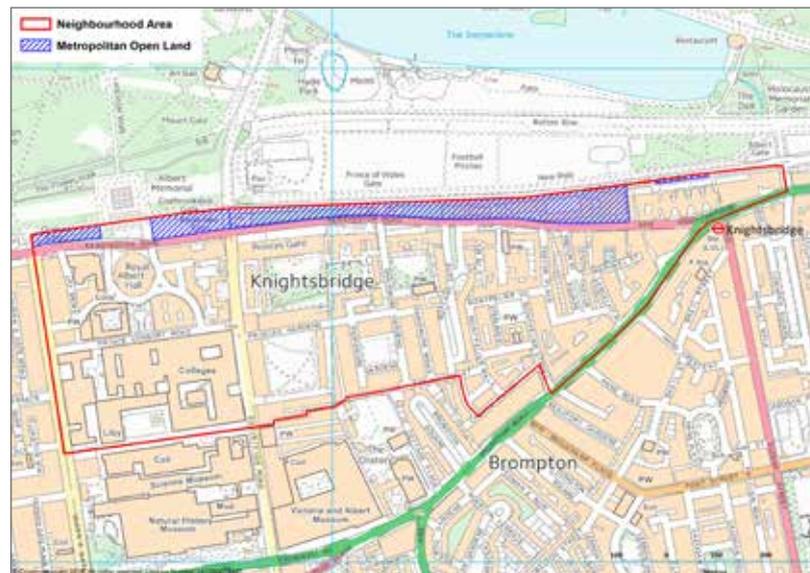
Name and address	Description/purpose	Quality of facility
<p>Upper Rutland Gate garden Knightsbridge London SW7 1BN Grid Ref: TQ272794</p> 	<p>Garden enclosure and lodge bounded on the north by the roadway of Kensington Road and on other sides by the roadway of Rutland Gate.</p>	<p>The garden is locked and is left unmanaged. This is due to it being in private ownership, where the owner is allegedly not locally based.</p> <p>The lack of management of the garden needs to be addressed; a passer-by was hit and killed by a falling tree in 2014.</p> <p>In that case, the jury offered the following statement <i>“The tree was in a bad condition. There was wholly inadequate maintenance by the owners of Upper Rutland gardens where the tree trunk and roots were located.”</i></p> <p>Community engagement identified the need to restore the heritage railings and other features.</p>
<b>Statutory designations Planning permissions</b>		
<p>London Squares Preservation Act 1931.</p> <p>Conservation Status: Borough Importance II</p> <p>Sits within Knightsbridge Conservation Area.</p>		
<b>Statutory designations</b>		
N/A		
<b>Planning permissions</b>		
N/A		
<b>NPPF criteria</b>		
<b>Close to the community</b>		
<p>This is a traditional garden square, bounded by residential properties. Privately-owned, it is currently locked and unavailable for public access. It is also not adequately managed.</p>		
<b>Demonstrably special to the local community?</b>		
<p>Upper and Lower Rutland Gate gardens are two fairly narrow gardens in a long dog-legged enclave running off Kensington Road. They are a haven for flora and fauna with long grass, shrubs and trees including London plane, lime and tree-of-heaven. The gardens have historical value dating to the early C19th, and remaining virtual intact to its original layout. The original piers and railings to Kensington Road survive but have been replaced in some parts for example by fencing and concrete posts. Eresby House, a large 1930s development, occupies a site between the two gardens, and has a trim contemporary forecourt garden.</p> <p>The garden comprises a lozenge shaped lawn to the side of a circular raised bed in front of the main entrance gate, with perimeter gravel paths.</p> <p>Between the paths and the boundary of the garden are low raised beds with shrubs and trees, and there are a number of decorative planters.</p>		
<b>Local in character / not extensive tract of land</b>		
Approximately 0.3 ha.		

Name and address	Description/purpose	Quality of facility
<p><b>Trevor Square</b> Knightsbridge London SW7 1DT Grid Ref: TQ275795</p> 	<p>Trevor Square is a small secluded square surrounding an oblong private garden that was built as part of a planned residential development in the early C19th, named after the Trevor family, who continued to own the land until the early C20th. In c.1704 Sir John Trevor had leased a late C17th mansion here, later called Powis House after a later tenant, purchasing the freehold in c.1715 when he acquired additional adjacent land.</p> <p>The garden is surrounded by a high hedge and chain link fence and is laid out with an oblong lawn with crescent beds at either end. A number of the early C19th buildings remain and 10 C19th cast-iron lamp standards surround the garden.</p>	<p>The mature gardens are highly regarded and managed by a local residents' group.</p>
<b>Statutory designations Planning permissions</b>		
<p>London Squares Preservation Act 1931.</p> <p>Lies in Knightsbridge Conservation Area.</p> <p>LBII: Nos.1; 2 &amp; 3; 4-16; 23-37; 38 Trevor Square; 10 lamp standards.</p>		
<b>Statutory designations</b>		
N/A		
<b>Planning permissions</b>		
N/A		
<b>NPPF criteria</b>		
<b>Close to the community</b>		
A traditional London garden square surrounded by residential properties.		
<b>Demonstrably special to the local community?</b>		
<p>The garden has historic value, having been designed from 1810 onwards by architect William Fuller Pocock, followed by his son, William Willmer Pocock. The initial design was approved by fellow architect Philip Hardwick. Arthur Hill-Trevor, 3rd Viscount Dungannon agreed to demolish his Powis House in 1811 to make way for the new development. The first houses surrounding the square were completed in 1820; most of them were completed by 1827.</p> <p>This is a quaint and neat garden development offering tranquillity and privacy, whilst being right in the heart of Knightsbridge and next to the amenities of Brompton Road.</p> <p>Part of the original Harrods storage building with its impressive architecture is located on one side of the square. The garden has gravelled paths and is bordered by charming copper beech and blossom trees.</p>		
<b>Local in character / not extensive tract of land</b>		
Approximately 0.2 ha.		

### 3 Metropolitan Open Land (MOL) and enable development of the Hyde Park Barracks land as a strategic housing site

- 3.1 The boundaries of Metropolitan Open Land (MOL) in the Knightsbridge Neighbourhood Area are shown in Figure 7. The Hyde Park MOL lies to the east of West Carriage Drive and the Kensington Gardens MOL to the west of West Carriage Drive.

**Figure 7: The Neighbourhood Area's MOL**



#### Character of the MOL

- 3.2 The Neighbourhood Area's MOL is subject to a variety of special designations, reflecting its special qualities. This section of the Plan refers to a publication by Land Use Consultants (LUC) produced in April 2016 and titled 'Report on the Metropolitan Open Land (MOL) within the Knightsbridge Neighbourhood Area: Local Character and Views'<sup>10</sup>. That report (hereafter referred to as 'the LUC report') addressed a study area similar to but larger than the Neighbourhood Area's MOL as it also included land in front of the Albert Memorial.
- 3.3 The local character of the Hyde Park Quarter is described in detail in Section 4 of the LUC report. As noted at paragraph 3.30 of the LUC report, whilst Westminster's City Plan does not have a specific policy on MOL, City Plan Policy S11 is concerned with the Royal Parks which are also designated as MOL. Policy S11 emphasises the importance of protecting settings, views and tranquillity. The NPPF likewise seeks to protect areas of tranquillity<sup>11</sup>. Protecting tranquillity across the Neighbourhood Area's MOL therefore represents a significant consideration for the Neighbourhood Plan.

#### Heritage of the Neighbourhood Area's MOL

- 3.4 The Neighbourhood Area's MOL has a significant heritage, with an understanding of its use stretching back as early as the eleventh century. The expansion of Knightsbridge adjacent to the park has steadily occurred over a number of centuries. This was influenced greatly by such major events as the Great Exhibition of 1851, with the 1851 Royal Commission still protecting its legacy to this day.

<sup>10</sup> [http://www.knightsbridgeforum.org/media/documents/knf\\_evidence\\_report\\_for\\_the\\_mol\\_110416.pdf](http://www.knightsbridgeforum.org/media/documents/knf_evidence_report_for_the_mol_110416.pdf)

<sup>11</sup> See NPPF para 123

- 3.5** This evolution over time has brought a rich heritage. It is important that this heritage is properly protected.
- 3.6** Within the Neighbourhood Area:
- the Kensington Gardens MOL forms part of Kensington Gardens Grade I Registered Park and Gardens;
  - west of Ennismore Gardens, the Hyde Park MOL forms part of Hyde Park Grade I Registered Park and Gardens; and
  - in the area east of Ennismore Gardens, the Hyde Park MOL lies outside Hyde Park Grade I Registered Park and Gardens but borders it to both its west and north.
- 3.7** The Neighbourhood Area's MOL all forms part of the Royal Parks Conservation Area. The Knightsbridge and Knightsbridge Green Conservation Areas are located to the south and east. Listed buildings are prevalent across these Conservation Areas, including within the Neighbourhood Area's MOL.
- 3.8** A significant feature of the Neighbourhood Area's MOL since 1793 has been the Hyde Park Barracks, which was created from parkland. The Hyde Park Barracks buildings and land accommodates a use of national importance as defined under Westminster City Council planning policy. The land occupied by the Barracks continues to have special status under law as part of the Royal Parks and the Forum's Board understands that it cannot be sold without primary legislation.
- 3.9** Representatives of the Forum observed the Defence Infrastructure Organisation's webinar on 28 February 2017 on the possible future of the Hyde Park Barracks land.
- 3.10** The application of policies KBR12 and KBR13 can contribute towards the achievement of SDGs 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 15 Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

## **POLICY KBR12: METROPOLITAN OPEN LAND**

- 3.11** This MOL within the Area enjoys the same protection as Green Belt<sup>12</sup>. The essential characteristics of MOL are its openness and permanence. Openness means the absence of buildings or development, not whether or not such buildings or development can be seen<sup>13</sup>. The policy conforms to London Plan Policy 7.17 (Metropolitan Open Land); Westminster City Plan Policy S11 (Royal Parks); and is consistent with Westminster UDP Saved Policy ENV14 (Metropolitan Open Land).
- 3.12** The purpose of the Neighbourhood Area's MOL designation is its fulfilling of the designation criteria set out in the London Plan<sup>14</sup>. Different areas of land within the MOL satisfy different designation criteria set out in the London Plan<sup>15</sup>.
- 3.13** The majority of the MOL is undeveloped and it contributes to the physical structure of London by being clearly distinguishable from the built up area.

### **Hyde Park Barracks land**

#### *Heritage and Use of National Importance*

- 3.14** The Hyde Park Barracks was created from parkland in 1793.
- 3.15** Since the introduction of this use in the eighteenth century, the Hyde Park Barracks land has exclusively been used as military barracks. This continuous use has meant that this land has remained functionally connected to Hyde Park. Its military and ceremonial use is an integral part of its significance as a heritage asset. The barracks use is a function related to the Government and the state and is a use of national of importance, per Westminster City Council's definition in Policy S27 Buildings and Use of International and National Importance.
- 3.16** The third and present barrack complex, designed by architect Basil Spence, was built in 1967-70 with the benefit of Crown immunity from planning approval. The Barracks is a heritage asset<sup>16</sup> of architectural and historic interest. Historic England has concluded that Hyde Park Barracks is of special architectural and historic interest, for its architectural interest, rarity in the military context, historic association and group value<sup>17</sup>.
- 3.17** The Proposals Map of the City Plan identifies part but not all of the Hyde Park Barracks as a Proposal Site (Site 34 – 'Strategic Housing Site 'with the capacity for over 100 units'), with Appendix 1 of the City Plan noting a 'change of use from barracks to residential, including full on-site provision of affordable housing and the full range of housing sizes.'
- 3.18** A change of use to residential use must be considered against the development plan as a whole, including London Plan, City Plan and Neighbourhood Plan policies.

<sup>12</sup> See London Plan Policy 7.17

<sup>13</sup> This is from a High Court judgement - *Timmins v Gedling Borough Council* [2014] EWHC 654 (Admin) ([http://www.landmarkchambers.co.uk/userfiles/documents/resources/Gedling\\_Judgment.pdf](http://www.landmarkchambers.co.uk/userfiles/documents/resources/Gedling_Judgment.pdf)).

<sup>14</sup> See London Plan Policy 7.17

<sup>15</sup> See London Plan Policy 7.17

<sup>16</sup> <https://historicengland.org.uk/advice/hpg/hpr-definitions/#h>

<sup>17</sup> Historic England's conclusion when considering HPB for listed status

## Legal restriction

- 3.19** The land occupied by the Barracks has special status under law and the Forum understands that it cannot be sold without primary legislation.
- 3.20** Hyde Park Barracks occupies land held under land title NGL893361. That title emphasises that the land at which Hyde Park Barracks is located is subject to section 7 of the Knightsbridge and other Crown Lands Act 1879 which states that:
- ‘The present site of the said barracks, including any vaults and openings to be constructed as aforesaid, shall remain part of Hyde Park, but so long as the same shall be used or occupied for barrack purposes for the troops of Her Majesty, her heirs or successors, shall be under the charge of the Secretary of War for the time being, and, subject to this provision, the same premises shall be deemed to belong to that part of the said park which by the said Act of the fourteenth and fifteenth years of Her Majesty, chapter forty-two, is placed under the management of the Commissioners of Works’.*
- 3.21** The Forum’s Board understands that the effect of the 1879 legislation is that this land is part of the Royal Parks and cannot be sold (by the British Government). The Forum’s Board also understands that it would require primary legislation to change this position.

## **POLICY KBR13: THE HYDE PARK BARRACKS LAND**

- 3.22** This policy sets out the criteria for development at Hyde Park Barracks land and conforms to London Plan Policies 7.4 (Local character) and 7.17 (Metropolitan Open Land); Westminster City Plan Policies S11 (Royal Parks) and S27 (Buildings and uses of international and national importance); and is consistent with Westminster UDP Saved Policy ENV14 (Metropolitan Open Land).
- 3.23** 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. Given that this would be in conflict with the strategic allocation for the site, then it is important that development is appropriate and reflects the wider context. In particular the height, bulk and footprint of any redevelopment should respect the scale and character of the local built environment. It was felt by some that the Peninsular Tower should be removed when possible (and not replaced).
- 3.24** It was also felt that any redevelopment should not include ground floor retail, as this would increase footfall along this part of Knightsbridge, which is a predominantly residential area close to the park.

## KNIGHTSBRIDGE'S COMMUNITY

### 4 OBJECTIVE 4.0 — PROMOTE THE SENSE OF COMMUNITY

Sub-objective 4.1 Enhance the vitality of local businesses which serve the local community while keeping the impacts of the day, evening and night-time economy away from residential areas

#### POLICY KBR14: MITIGATING THE IMPACT OF COMMERCIAL DEVELOPMENT

4.1 The Westminster City Plan identifies 'Local Stress Areas'. These are places that WCC considers that the numbers of restaurants, cafés, takeaways, public houses, bars and other entertainment uses have reached a level of saturation. Paragraph 8.93 of the WCC UDP states that:

*'The City Council considers that such uses are concentrated in these areas where harm is being caused because of loss to residential amenity, impacts on other commercial uses, adverse effects on the local environment and inappropriate change to their character and function.'*

4.2 The Neighbourhood Plan seeks to complement the WCC approach by addressing the unwanted consequences of both entertainment and commercial activity, including air pollution, noise, anti-social behaviour and cluttered streets, which have created a situation where harm is being caused to the area and its residential amenity. These activities, independently and collectively, take place across 16 hours of the day, between 8:00am and midnight and have been raised frequently through the engagement exercise.

4.3 The main issues include:

4.4 Extreme pedestrian congestion on pavements during the day as tourists visit the area and in the evening and night as people are attracted to it and loiter often in large groups. The high concentration of attractions, shops and cafés attracts high numbers of visitors throughout the day well into the late evening. Throughout the engagement discussions, local people repeatedly raised concerns about the trend toward shisha outlets where there is a likelihood that people will turn up and congregate specifically to smoke shisha, either with or without food. Unlike other eating establishments, this leads to increased gatherings of groups on the pavements. Along the Brompton Road, this is further exacerbated by the high number of tables and chairs outside restaurants and cafés.

4.5 In addition, a local residents group complained to a public house in the Area about anti-social behaviour that was impacting on residents. This included noise, on-street brawls and drunken and intimidating behaviour.

- 4.6 Proliferation of beggars, buskers and thieves attracted to the crowds during the day and evening**  
16% of all local complaints to Westminster City Council in 2015-16 from Sloane Street, Montpelier Street and Brompton Road<sup>18</sup> involved busking and it's an issue that was raised numerous times during the engagement process. While busking is perhaps a traditional activity in many cities, including London, and many buskers abide by local codes of conduct (often voluntary), in tourist areas, they inevitably attract large gatherings of people, which obstruct pavements and impinge pedestrian movement. The area outside Harrods is an example of heightened busker activity. Local people additionally raised concerns about growing numbers of beggars and theft – pickpocketing and damage to property – again exacerbated by the concentration of large numbers of tourists and stationary crowds.
- 4.7 Chronic and acute traffic congestion at most hours of the day or night**  
Many parts of the Area receive high volumes of vehicular traffic at all times of the day. Brompton Road itself is a red route. The sheer amount of traffic, combined with the high number of pedestrians, contributes to the saturation. Figures 4 and 5 in section 2 illustrate the above-average number of collisions involving vehicles in the wider Area.
- 4.8 Public transport overloaded (e.g. with Knightsbridge underground station frequently closed due to overcrowding)**  
Perhaps not surprisingly given the notability of the Area and the concentration of world-class institutions and attractions, Knightsbridge underground station was the 34th busiest tube station out of a total of 264 stations in 2015<sup>19</sup>. A total of 20,297 million entries and exits were recorded across the year. In 2015-16, the underground station was closed six times because of overcrowding, with access to the platforms restricted for an average of 10 minutes.
- 4.9 Air pollution far exceeding legal limits and guidelines**  
Air pollution is a growing concern across the country and inevitably is more concentrated in urban areas. According to Clean Air in London, it averages well over twice World Health Organisation (WHO) guidelines and legal limits near many of London's busiest roads. Mayor Johnson, during his time in office, estimated some 4,300 premature deaths in London in 2008 were attributable to long-term exposure to dangerous airborne particles alone.
- 4.10 The problem along Brompton Road is particularly acute, breaching the nitrogen dioxide (NO<sub>2</sub>) hourly limit value for the whole of 2017 within the first few days of 2017.**
- 4.11 Shisha use - water pipe smoking and electronic**  
The significant health risks associated with water pipe smoking include cancer, respiratory disease and heart disease. Whilst water pipe smoking is prohibited inside buildings, a number of cafés in Knightsbridge are selling electronic shisha services indoors into the early hours of the morning, possibly illegally.

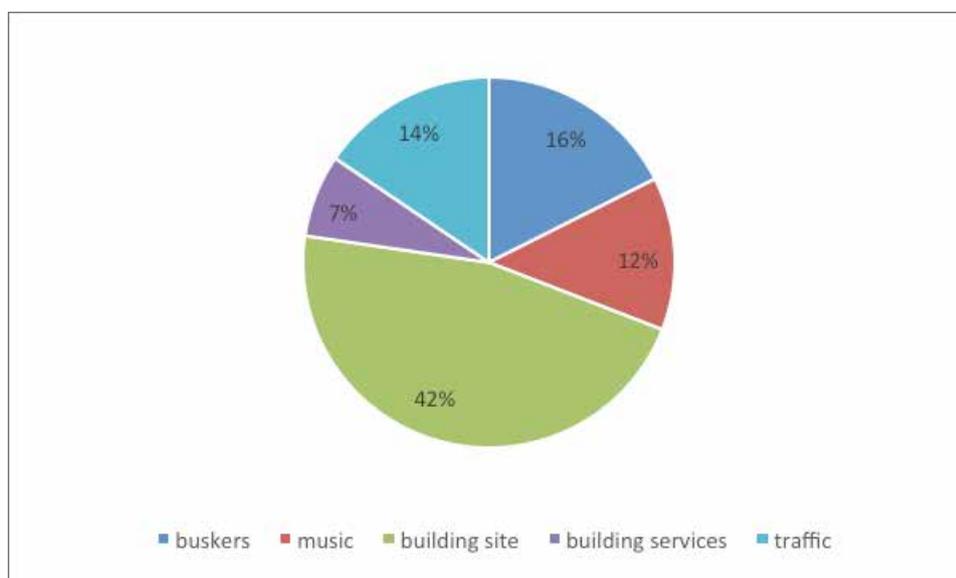
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<sup>18</sup> Complaints by street, 2015-16

<sup>19</sup> TfL Station entry exit figures, 2015-16

- 4.12** There is a difference in ingredients between water pipe smoking and electronic use. Most electronic shisha pens are free of carbon monoxide, heavy metals (arsenic and lead) and other cancer causing chemicals found in traditional shisha. Devices contain varying degrees of nicotine depending on the brand. They also include a variety of fruit flavouring, vegetable glycerine and propylene glycol.
- 4.13** Electronic shisha pens do not produce smoke, so there is neither a risk of passive inhaling, nor an unpleasant odour. However they are new products and have yet to be confirmed as being safe to health.
- 4.14** Many road traffic collisions involving serious injury or death  
As illustrated previously in Figures 4 and 5, Knightsbridge has a significantly higher number of both slight and serious collisions involving motor vehicles when compared to the Westminster and London averages. The likelihood of collisions is exacerbated because of the high concentration of vehicles, often congested, mixed with the high number of people – including tourists – that this area attracts.
- 4.15** Filthy pavements, litter and rubbish dumping  
Dirty pavements are a real problem in the area, particularly along the Brompton Road. In August 2016, WCC launched a campaign aimed at businesses to help prevent oily stains seeping onto the highway from poorly presented bags of rubbish and waste. It was complemented by deep street cleansing. Much more is needed, more frequently.

**Figure 8: Complaints recorded by WCC in 2015-16**



- 4.16** Noise and anti-social behaviour in the evening and late at night  
Data relating to complaints about noise between 2015 and 2016 revealed that the main source of noise in the areas of Brompton Road, Montpelier Street and Sloane Street was associated with building works, followed by buskers, traffic, music and general noise emanating from building services. This is detailed in Figure 8. 75% of the complaints were from residents in Brompton Road.

**4.17 Impact of eateries located close to residential areas**

Within parts of the Area, there are numerous residential properties located in close proximity to a range of eating places, including take aways, restaurants and sandwich bars. Many of these operate for long hours each day and impacts on the residential amenity include: small crowds gathering at entrances creating noise and obstructing the pavement; noise from delivery vehicles during anti-social hours; cooking smells; general noise from equipment; and littering. This is one area of stress that is covered largely by Westminster's Local Stress Areas policy. A recent planning appeal<sup>20</sup> to convert a sandwich bar into a mixed use restaurant and hot food takeaway was rejected predominantly on the grounds of the negative impact it would cause.

**4.18** Individually and collectively, these symptoms confirm that harm is being caused to residential amenity, health and safety, local environment quality and the character and function of the wider Area.

**4.19** Over the lifetime of the Plan, these pressures would increase without intervention. The commencement in 2016 of night-time services on the London Underground means that some premises might wish to start operating much longer hours, particularly on weekends.

**4.20** The particular part of the Area that fulfils these criteria is Brompton Road, Knightsbridge between Scotch House Corner and the Bulgari Hotel, Knightsbridge Green, Cheval Place, the southern half of Montpelier Street, Lancelot Place and Raphael Street. This includes the alleyway along the side of the Bulgari Hotel, providing access to Raphael Street, and Park Close.

**4.21** The Plan seeks to complement the Westminster UDP saved policies relating to entertainment uses whilst enhancing the vitality of local businesses which serve the local community and minimising the impacts of the day-time, evening and night-time economy on the residents, workers and visitors to the Area.

**4.22** WCC UDP Saved Policies TACE8, TACE9 and TACE10 provide a clear framework for uses within the Central Activities Zone (CAZ), which includes the Area. Policy KBR14 seeks to ensure that proposals have clear protocols in place to ensure that users of commercial and entertainment premises are dispersed effectively (i.e. avoiding loitering) and that other issues such as litter and noise are dealt with.

**4.23** This policy conforms to London Plan Policies 2.10 (Central Activities Zone – Strategic priorities), 2.11 (Central Activities Zone – Strategic functions), 2.12 (Central Activities Zone – Predominantly local activities), 4.6 (Support for and enhancement of arts, culture, sport and entertainment) and 4.7 (Retail and town centre development); Westminster City Plan Policy S24 (Entertainment uses); and is consistent with Westminster UDP Saved Policies TACE8 (Entertainment uses which will generally be permissible), TACE9 (Entertainment uses which may be permissible) and TACE10 (Entertainment uses which will be permissible only in exceptional circumstances). The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

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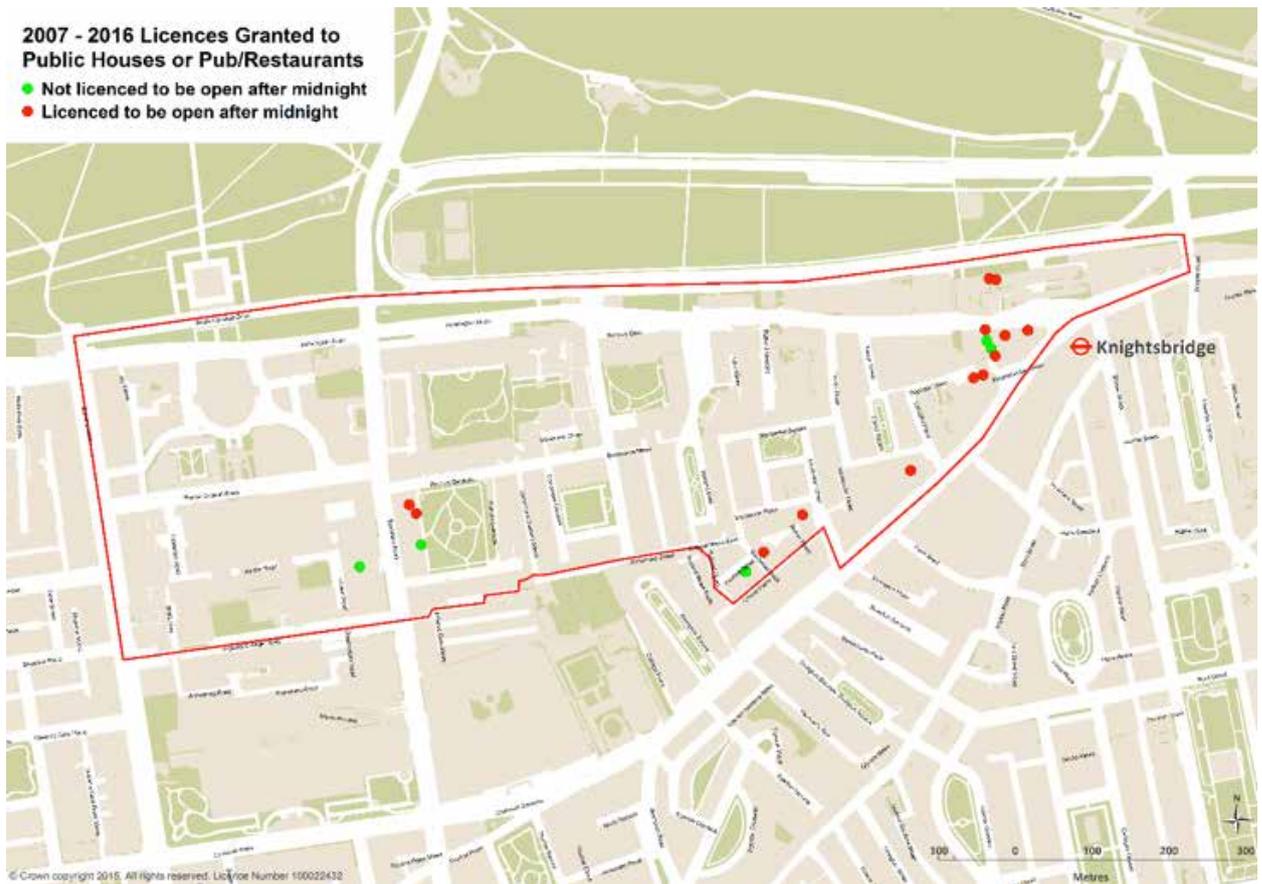
<sup>20</sup> Appeal Ref: APP/X5990/C/16/3163157 2 Montpelier Street, London SW7 1EZ

## **POLICY KBR15: NIGHT-TIME AND EARLY MORNING USES IN OR ADJACENT TO RESIDENTIAL AREAS**

- 4.24** The engagement process revealed a keen desire to limit the impacts of night-time and early morning activities in areas that border residential areas. In particular noise, anti-social behaviour and litter and street cleansing were mentioned as problems. Whilst visitors are welcomed, increased tourist footfall has caused, or contributed to, many problems along Brompton Road and other streets. These include congestion for pedestrians and vehicles, tourist coaches, pedicabs and rickshaws, excessive signage at pavement level and street furniture creating obstructions. Late licences cause problems for residents including loitering and noise in nearby streets into the early hours of the morning.
- 4.25** This policy seeks to limit that impact and conforms to London Plan Policies 2.10 (Central Activities Zone – Strategic priorities), 2.11 (Central Activities Zone – Strategic functions), 2.12 (Central Activities Zone – Predominantly local activities) and 4.7 (Retail and town centre development); and Westminster City Plan Policy S24 (Entertainment uses).
- 4.26** The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns. Culture and the night time economy is likely to be a ‘significant feature’ of the next London Plan according to a ‘vision’ document<sup>21</sup> published by the Mayor of London. The intention is to help create a “vibrant, world-class night time culture for all Londoners”. The document says that by “encouraging a better distribution of night time activity, we can lessen the pressure on London’s hotspots, reduce the need to travel and make our city more sustainable”. It says that City Hall will support councils in developing visions for their night time economies. “A borough-wide vision for the night time economy will help local authorities to positively shape their offer, informing planning, licensing and other strategies”.
- 4.27** Figure 9 shows where late-night licences until 11pm or later at least six nights a week have been granted within the Area since 2007. The large majority of these are clustered at the eastern end of the Area and are licenced to open until at least midnight at least six nights per week.

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<sup>21</sup> From good night to great night, A vision for London as a 24-hour city, Mayor of London, 2017

**Figure 9: Late-night licences granted since 2007**

*Source: Westminster City Council*

- 4.28** It is noted that these areas are also residential areas and are home to significant numbers of people.
- 4.29** The NPPF requires planning policies and decisions to avoid noise giving rise to significant adverse impacts on health and quality of life and to mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development. This specifically refers to use of planning conditions to achieve this. Noise from existing premises is dealt with by the Licensing Team at WCC through enforcement action – the fact is that local residents do experience a significant impact on their amenity from this evening and night-time activity.

## **KBR16: SECURITY AND RESILIENCE MEASURES**

- 4.30** Safety and well-being was mentioned frequently during the engagement phase, particularly in the context of increasing numbers of homes remaining empty for long periods. This has served to erode the sense of community and the very heart of Knightsbridge, already leaving some people feeling isolated and more vulnerable.
- 4.31** Knightsbridge has experienced three terrorist incidents since 1980: the Iranian Embassy siege (from 30 April to 5 May 1980), the Hyde Park bombing (on 20 July 1982) and the Harrods car bombing (on 17 December 1983). Previous to these, it experienced the Spaghetti House siege (from 28 September 1975).
- 4.32** There are many examples of how applicants can enhance the safety of shopping areas and town centres, which have read across to the International Shopping Centre in Knightsbridge. Having an effective partnership of local businesses is identified as the most important step according to a report by the BRE Trust<sup>22</sup> along with a strategy to prevent crime and antisocial behaviour, but physical solutions too can help including:
- Installation of visible closed circuit television (CCTV)
  - Effective use of vandal-resistant lighting to prevent dark areas
  - Clear signage to transport hubs
  - Reduced street clutter
  - Minimising open alleyways
  - Clearly marking private spaces as opposed to publicly accessible spaces
- 4.33** This policy seeks to ensure that new developments have appropriate security measures in the place to minimise these risks and increase resilience, conform to London Plan Policies 7.3 (Designing out crime) and 7.13 (Safety, security and resilience to emergency); and Westminster City Plan Policy S29 (Health, safety and well-being).
- 4.34** The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

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<sup>22</sup> [https://www.bre.co.uk/filelibrary/pdf/rpts/safe\\_secure\\_town\\_centres\\_at\\_night.pdf](https://www.bre.co.uk/filelibrary/pdf/rpts/safe_secure_town_centres_at_night.pdf)

Sub-objective 4.2 Ensure new food, drink and entertainment uses do not result in high concentrations of such uses and that residential amenity can be demonstrably protected

### **POLICY KBR17: RETAIL USES IN THE INTERNATIONAL SHOPPING CENTRE**

- 4.35** This policy seeks to minimise loss of retail in the primary shopping areas of Knightsbridge. It conforms to London Plan Policies 2.10 (Central Activities Zone – Strategic priorities), 4.7 (Retail and town centre development) and 4.8 (Supporting a successful and diverse retail sector and related facilities and services); and Westminster City Plan Policy S21 (Retail); and is consistent with Westminster UDP Saved Policy SS3 (Enhancing shopping in the International Centres’ Primary Shopping Frontages).
- 4.36** High quality retailing in Knightsbridge is supported by policy. The main shopping frontages along the stretch of Brompton Road that is in the Area are designated by WCC as an International Shopping Centre and Primary Shopping Frontage. Yet Figure 10 shows that, in the area highlighted, which is wider than the Primary Shopping Frontage, less than 20% of the ground floor units were occupied by international-quality retailers on 1 January 2017. Furthermore, less than 37% were in any form of retail (Class A1) use.
- 4.37** Westminster UDP Saved Policy SS3 states that a change from Class A1 (retail) use at ground floor level to other uses (e.g. cafés, bars, restaurants) will only be permitted ‘in the most exceptional circumstances’. It then goes on to state that there are very few circumstances where this would be acceptable, the only one cited being a ‘swap’ from another use.

*Cluster of cafés, restaurants and take-aways, Brompton Road*



- 4.38** However, these uses make up a significant proportion of the frontage of Brompton Road. In August 2016, approximately 25% of the units in the Primary Shopping Frontage were cafés, restaurants or sandwich takeaways. When expanding the area to include all units around the wider eastern part of the Area, this increases to 36% of the units, as shown in Figure 10. Moreover, this is increasing. Since 2012, the number of these uses along the stretch 132-188 Brompton Road has increased from 21% of the units to 30%<sup>23</sup>.
- 4.39** So not only has there been an increase but, with no prospect of a significant expansion in the number of retail units in the area, this means that it will take time to improve the quality of the retail offer. Local residents are clear that the large number of cafés and takeaways serves to detract from this offer and from residential amenity.
- 4.40** As is noted by the WCC Shopping Area Health Check Survey, ‘Knightsbridge’s strengths are the quality of the retail environment and selection of comparison retailers’<sup>24</sup>. Further loss of retail units to other uses will put this status under considerable threat. Opportunities to enhance the International Shopping Centre’s international reputation should therefore be taken wherever possible.
- 4.41** The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

**Figure 10: Use classes based on planning permission of ground floor units in Knightsbridge along Primary Shopping Frontages, 1 January 2017**



<sup>23</sup> Source: Westminster City Council monitoring

<sup>24</sup> WCC (2008) Primary Shopping Area 4 (Knightsbridge): Shopping Area Health Check Survey, paragraph 1.31

### Sub-objective 4.3 Protect and enhance local amenity and retail services and commercial activities

#### **POLICY KBR18: PROTECTION OF PUBLIC HOUSES**

- 4.42** The loss of public houses over the years was cited as a real loss by many in the community. There was a feeling that this was an example of how community life in Knightsbridge was being slowly eroded. The relatively recent loss of community assets such as the Swag and Tails and Tea Clipper pubs, which were sold separately for residential redevelopment, is a good example of this. This policy seeks to safeguard the remaining drinking establishments in the Area and conforms to London Plan Policies 3.16 (Protection and enhancement of social infrastructure) and 4.8 (Supporting a successful and diverse retail sector and related facilities and services).
- 4.43** The application of the policy can contribute towards the achievement of SDGs 6, 11 and 12.

#### *Paxton's Head and Tattersalls Tavern*



#### **POLICY KBR19: COMMUNITY USES**

- 4.44** Isolation, particularly of older residents, and particularly in the context of empty 'buy-to-leave' properties, is an issue in Knightsbridge. As with the loss of public houses, so local people also talked frequently about the lack generally of community facilities; spaces where residents could meet and socialise. This policy supports the provision of facilities that address this issue, for instance which provide community and leisure opportunities (particularly for older people) and conforms to London Plan Policy 3.16 (Protection and enhancement of social infrastructure); and is consistent with Westminster UDP Saved Policy TACE5 (Arts and cultural uses).
- 4.45** The application of the policy can contribute towards the achievement of SDGs 6, 11 and 12.

## POLICY KBR20: OFFICE USES

- 4.46** The consultation revealed the importance of retaining office space in the Area. The growth of fast-food outlets and cafés has particularly eroded this sector. In July 2015, WCC published a statement to restrict conversion of offices to residential stating:

*“Therefore, applications submitted from 1st September 2015, will be determined under a ‘presumption in favour of sustainable development’ in line with national policy. This means that in the Core CAZ, Named Streets and Opportunity Areas, housing is no longer acceptable in principle where it results in the loss of office floorspace. Exceptions to this will be very rare because in the time period this interim position is expected to operate, delivery of commercial, and more specifically office floorspace will not recover sufficient to permit office losses.”*

- 4.47** This policy seeks to reinforce the business base in Knightsbridge and conforms to Westminster City Plan Policy S20 (Offices and other B1 floorspace). In particular it seeks to provide protection to the office use at 1 Knightsbridge Green, this being the only large office address remaining in the Area.

- 4.48** The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

Sub-objective 4.4 Hold property owners accountable for actions emanating from their properties

## POLICY KBR21: HOUSEHOLD AND COMMERCIAL WASTE CONSOLIDATION

- 4.49** It is important to residents that all streetscapes should be kept clean, accessible and visually well presented. This policy seeks to provide a solution to the problems associated with rubbish in Knightsbridge – both residential and commercial - often cited throughout the engagement process. It conforms to London Plan Policy 5.17 (Waste capacity); and Westminster City Plan Policy S44 (Sustainable waste management); and is consistent with Westminster UDP Saved Policy ENV12 (Waste and recycling storage).

The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

### Residential waste

- 4.50** A report<sup>25</sup> by Imperial College London sets out background information and recommendations for dealing with waste. Over 180,000 tons of municipal waste was produced in the Westminster borough in 2014 (Westminster Council), a significant amount of which stems from households. At present, both non-recyclable and recyclable rubbish is required to be left out in bin bags on the street for collection. Not only does this result in large unsightly

<sup>25</sup> Review of the Knightsbridge Neighbourhood Plan – Pollution management - Policy case study, ICL, 2017

piles of rubbish bags but these are often ripped open by larger birds and animals such as foxes and squirrels, resulting in rubbish being strewn across the street.

The provision of a system of recycling and waste consolidation for local streets, in keeping with the character of the Area, would help to address this.

*Rubbish outside a short tenancy property*



- 4.51** In the year 2015/16, the household recycling rate for the Westminster borough was 17.3% (SITA, 2016). For the last five years preceding up to 2015/16, the recycling rate in the Westminster borough has been decreasing. The national target for household recycling rate is 50% by 2020. There are concerns about this objective not being reached especially in the London boroughs.
- 4.52** An important driver is population growth. Within the borough of Westminster, the population is expected to grow by 7.8% in 2031 (Westminster City Council, 2013). Considering that part of all of the Hyde Park Barracks may be developed for housing, the neighbourhood may experience a significant population rise above current trends. This will put a strain on the existing household waste management system.
- 4.53** Examples from elsewhere in Europe show that this can be provided to be in keeping with the local context and using relatively little space, as per the photograph below.

*Example of a waste consolidation system in France*



*Rubbish bins, Jay Mews*



**4.54** Possible locations for non-recyclable and recyclable waste systems, subject to further consultation, include:

- Raphael Street
- Relton Mews
- The south side of Upper Rutland Gate gardens
- The area in front of the Russian Orthodox Church
- Jay Mews
- Kingston House North
- Rutland Gardens
- East of Ennismore Gardens Mews.

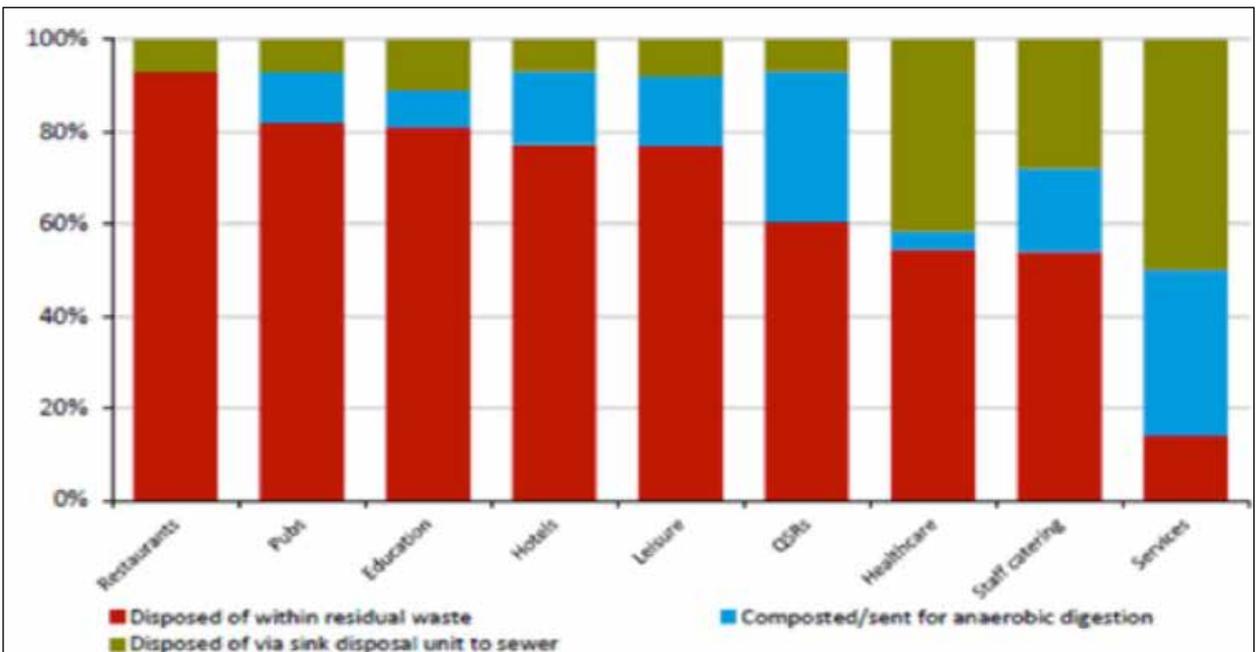
**4.55** Recommendations for tackling household waste include:

- Any new housing development should have a self-contained recycling unit, for instance a ‘Compod’ which allows for waste source segregation.
- Depending on the scale of the housing development a composting unit should be available which will turn food waste into compost. This produce will be used on the local greenery, instead of chemical fertiliser when appropriate.

**Commercial and industrial waste including food and material waste**

**4.56** In addition to recyclable and non-recyclable rubbish, food waste is both a local and national issue, particularly for the commercial and industrial sector. With the high number of cafés, eateries and restaurants in Knightsbridge, it is important that there is effective management of food waste. Figure 11 shows the management of food waste and the high proportion that is simply disposed of with other waste by restaurants and pubs.

**Figure 11: Management of food waste, 2013**



Source: DEFRA

- 4.57** Material waste is another area of concern and should be addressed by the Plan. Three reasons why it needs to be tackled include resource depletion, the UK 2020 target of 50% of household recycling rates (CIWM, 2016) and projected population growth.
- 4.58** The uses illustrated in Figure 10 should be encouraged to have a food and material waste management plan. The waste hierarchy should dictate the pattern of behaviour on how this wasted food should be handled. The waste hierarchy ranks waste management options according to what is best for the environment. Thus, redistributing the food should be of the first order as this falls into the prevention tier.
- 4.59** Recommendations for tackling commercial and industrial waste include:
- before approval to operate an A3 unit, the operators should devise a food waste management plan;
  - before having approval to operate an A3 unit, the operators should devise a material waste plan; and
  - Guiding Principles - food waste prevention should be prioritised; stock management and stock storage should be optimised; and food disposal via residual waste to be minimised.
- 4.60** The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

## Sub-objective 4.5 Ensure construction impacts are managed and reduced

### **POLICY KBR22: CONSTRUCTION ACTIVITY**

**4.61** A major source of concern for local residents, evidenced in the engagement process, was the negative impacts that construction can have within residential areas. This policy seeks to minimise these impacts and conforms to London Plan Policy 5.18 (Construction, excavation and demolition waste).

**4.62** Disturbance from construction commonly takes the form of:

- pollution - dust, dirt, vehicular pollution, etc.;
- noise and vibration - both from large construction vehicles and practices and also from workers, particularly early in the morning and on weekends;
- safety - with the use of scaffolding covering paved areas and large construction vehicles mounting pavements or blocking sightlines for those crossing the street; and
- restricted access to properties - including restrictions for on-street parking.

*Large construction vehicle, Rutland Street*



*Scaffolding affecting amenity*



**4.63** Over a prolonged period of time, this can be detrimental to health and wellbeing.

**4.64** Construction practices that do not take account of the sensitive historic environment and infrastructure in Knightsbridge have had the following impacts:

- Damage to old and fragile buildings that are sensitive to vibration.
- Damage to weak under-pavement vaults.
- Collapsed clean and dirty water street drains.
- Caved-in or collapsed roads.

*Example of caved in road, corner of Cheval Place and Relton Mews, July 2017*



- 4.65** WCC has a Code of Construction Practice which contractors are required to sign up to and this addresses many of the issues. In addition, the Greater London Authority provides guidance on the control of construction dust and emissions and the use of Non-Road Mobile Machinery (NRMM)<sup>26</sup>. However, they do not fully address all of the issues that arise, often due to the intensity of activity in the Area. In the past, the Area has raised various issues when commenting on planning applications in an attempt to mitigate the negative impact of the developments. Outside of the Neighbourhood Plan, the Forum has provided its own best practice that development proposals are encouraged to follow in order to minimise disruption to local communities. This is available on the Forum's website.
- 4.66** In 2018, the Considerate Constructors Scheme (CCS) issued new guidelines for monitors to ask: '*Are all reasonable efforts being made to minimise the impact of vibration and of air, light and noise pollution?*'; and '*How is vibration and air, light and noise pollution measured and managed to minimise effect?*' Answers to these questions will contribute to the identification of best practices and improved industry practices.
- 4.67** Therefore a policy framework at the Knightsbridge level, that complements the Westminster Code of Construction Practice and CCS, is required that is relevant to the issues faced in the Area and avoids the need to repeat comments from the community on many similar planning applications.
- 4.68** The application of the policy can contribute towards the achievement of SDGs 6: Ensure availability and sustainable management of water and sanitation for all; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; and 12: Ensure sustainable consumption and production patterns.

<sup>26</sup> GLA (2014) The control of dust and emissions during construction: Supplementary Planning Guidance

## **5 OBJECTIVE 5.0 — PROTECT AND ENHANCE EXISTING RESIDENTIAL AMENITY AND MIX**

Sub-objective 5.1 Encourage new residential developments to provide a range of housing in value and size

5.1 The application of this suite of policies can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

### **POLICY KBR23: RESIDENTIAL MIX INCLUDING TO SUPPORT LOCAL WORKERS AND STUDENTS**

5.2 There was concern in the community, including within cultural and education institutions, that not enough is being done to enable those working or studying in the area to have the opportunity to live here. Feedback received from the Royal College of Music, for instance, indicated that there is oversubscription for their halls of residence around the 40 student mark against 271 beds and 800 students. The availability of housing at an affordable price (as opposed to ‘affordable housing’) is a major problem in the area. Research undertaken by the London School of Economics revealed that an influx of overseas buyers is leading longer-term residents to sell up and move from some parts of London, contributing to the problem.

5.3 While this will require a London-wide approach, this policy seeks to ensure that residential provision is of mixed sizes and tenure to encourage a wider choice of homes and conforms to London Plan Policy 3.8 (Housing choice); and Westminster City Plan Policies S15 (Meeting housing needs) and S16 (Affordable housing); and is consistent with Westminster UDP Saved Policy H4 (Provision of affordable housing).

Sub-objective 5.2 Encourage the restoration of period and other residential buildings to their original size and configuration where this will increase the number of units

### **POLICY KBR24: RECONFIGURATION OF EXISTING RESIDENTIAL BUILDINGS**

5.4 During the engagement process, residents expressed concern over the loss of residential dwellings in the area often due to conversions. Fewer dwellings can lead to a reduced mix of property sizes available, which in turn can erode the sense of a vibrant residential community as there are fewer opportunities for people to move into the Area.

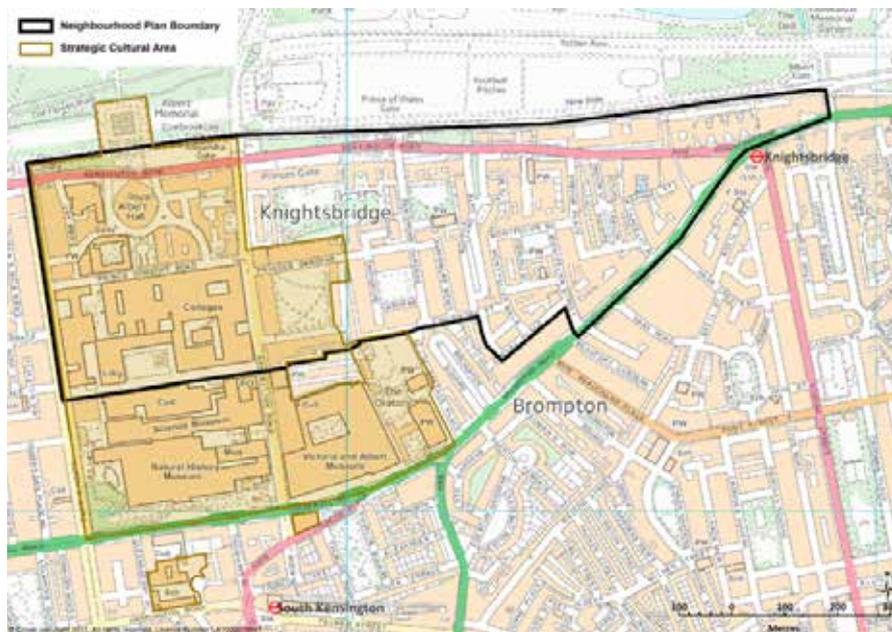
5.5 This policy supports the restoration of residential buildings back to their original format (e.g. lateral conversions and the reversion of double-fronted properties into two adjacent houses), and where, for instance, it splits a property into flats, thus providing more dwelling spaces. This conforms to London Plan Policies 3.8 (Housing choice) and 3.14 (Existing housing); and Westminster City Plan Policy S14 (Optimising housing delivery); and is consistent with Westminster UDP Saved Policy H5 (Providing a range of housing sizes).

## KNIGHTSBRIDGE'S CULTURE AND EDUCATION

### 6 OBJECTIVE 6.0 — FOSTER AN ENVIRONMENT THAT ENABLES OUR WORLD-CLASS CULTURAL AND EDUCATIONAL INSTITUTIONS TO THRIVE AS CENTRES OF LEARNING AND INNOVATION WITHIN A FLOURISHING COMMUNITY

6.1 The policies in this section focus on the Strategic Cultural Area. The boundary of this stretches beyond the boundary of the Neighbourhood Area, as is shown in Figure 12 (the brown boundary signifies the Strategic Cultural Area). All policies that refer to the Strategic Cultural Area only relate to that part which is within the Neighbourhood Area.

**Figure 12: Strategic Cultural Area**



6.2 The western end of the Neighbourhood Area is home to the world's first planned cultural quarter, which today attracts over 20 million visits a year and thousands of students from all over the world. Created from the legacy of the Great Exhibition of 1851 as a centre of knowledge and inspiration in the arts, science and design, the area houses three of the world's most popular museums - the Natural History Museum, Victoria and Albert Museum, Science Museum (which are all located just outside the Area) and three colleges dedicated to arts, science and design - Imperial College London, the Royal College of Music and Royal College of Art. The most famous concert venue in the world, the Grade I listed Royal Albert Hall, which was created originally as the Central Hall of Arts and Sciences, addresses the Albert Memorial in Kensington Gardens which is axially opposite.

6.3 Using the profits from the Great Exhibition, these world class cultural venues and centres of research and education were established following the purchase of 87 acres of land in South Kensington. The administrative body responsible for the delivery of the Exhibition, The Royal Commission for the Exhibition of 1851, was subsequently made permanent and oversaw the establishment of this cultural quarter. The Royal Commission's work continues to this day, its central aim being to continue to choreograph the Royal Commission's founding president Prince Albert's original ambition to "increase the means of industrial education and extend the influence of science and art upon productive industry". The Royal Commission continues to act as landlord for much of the original estate.

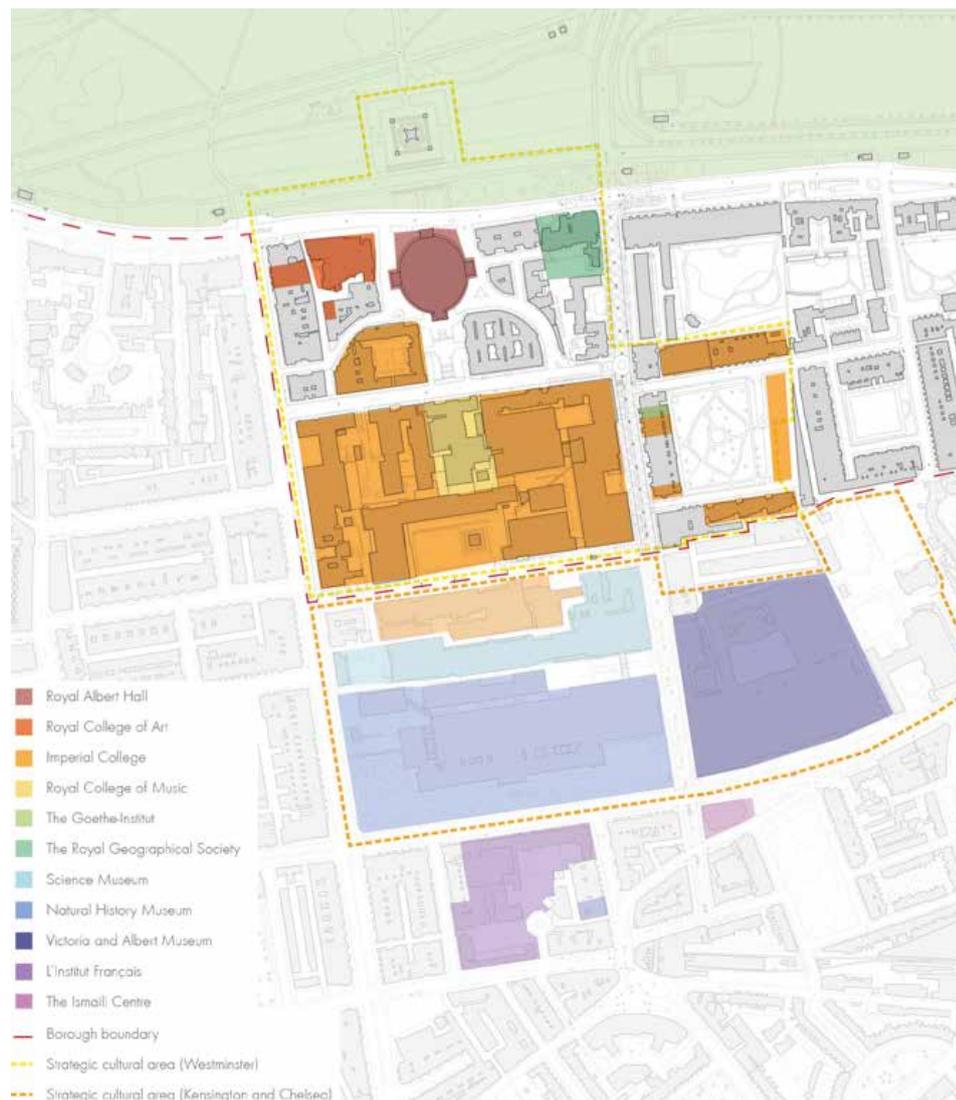
*Imperial College London**Royal College of Art*

- 6.4** London's cultural, creative and education sectors are central to the city's economic and cultural well-being. Whilst the Mayor has no single delivery agency for culture or the arts, in 2014 the Mayor approved the second iteration of his Cultural Strategy Cultural Metropolis. This strategy promotes the importance of partnership working across relevant agencies. The western part of the Neighbourhood Area's world renowned cultural significance is recognised in the London Plan under Policy 4.6. The Westminster City Plan of 2016 also identifies the area either side of Exhibition Road as one of its three Strategic Cultural Areas.
- 6.5** 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. This will be undertaken whilst recognising that the Area has matured into an established and thriving residential area. This vibrant and complex pattern of mixed-use neighbourhoods which characterises much of Westminster is celebrated and encouraged in Westminster's City Plan and most particularly under its Central Activities Zone Policy S1 within which the Knightsbridge area falls. Support is also provided for ongoing investment in cultural, education and research uses in the relevant policies of the neighbouring Royal Borough of Kensington and Chelsea development plan.
- 6.6** The Strategic Cultural Area hosts a wide range of cultural, education and research bodies. These diverse, dynamic and world-renowned activities which include training, outreach, research, teaching, performance, promotion, expertise, design and creation, writing, publishing, entertainment, exhibition underpin the special qualities of this cultural quarter. Continued evolution, investment and innovation within each of the organisations is essential if the area is to maintain its world-leading position. Organisations which come together to form this quarter include (bold indicating the facility falls within the City of Westminster and the Neighbourhood Area with non-bold venues falling within the Royal Borough of Kensington and Chelsea):

- Royal Albert Hall
- Royal Commission for the Exhibition of 1851
- Imperial College London
- Royal College of Art
- Royal College of Music
- Royal Geographical Society (with IBG)
- Goethe-Institut
- Victoria and Albert Museum
- Science Museum
- Natural History Museum
- Institut français
- Ismaili Centre, Kensington Palace

6.7 Figure 13 shows the extent of the Strategic Cultural Area and the estates of the principal cultural and education institutions.

**Figure 13: Plan showing the extent of the Strategic Cultural Area in relation to the Borough boundary and the respective estates of the principal cultural and educational institutions across the Area**



Source: Exhibition Road Cultural Group

- 6.8** This part of London has a unique and very special history as the world’s first planned cultural quarter. The institutions which come together within this Strategic Cultural Area are each world-renowned centres of excellence and play an extremely important part in London’s status as a leading world city. The role played by the venues and universities across the Exhibition Road area, with their shared historical associations with the Great Exhibition of 1851, cannot be overemphasised.

*‘Re-imagining Albertopolis’*



The application of this suite of policies can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

- Sub-objective 6.1** Support the educational and cultural institutions in progressing plans that will enable them to remain world-class in their respective fields within a flourishing community

**POLICY KBR25: EXISTING AND NEW DEVELOPMENT WITHIN THE STRATEGIC CULTURAL AREA**

- 6.9** The existing cultural, education and research uses within the Strategic Cultural Area are the primary elements which combine to create the Area’s special character. Whilst the townscape characters of many of the individual buildings play a crucial part in establishing this unique character, it is the concentration of cultural, education and research uses and activities – of people working in, teaching in, learning in, and visiting the area – which underpins the character of the area. Loss of these uses through redevelopment would undermine the quality of this internationally important cultural quarter which plays such an important role in maintaining London’s position as a pre-eminent international centre for the arts and sciences.
- 6.10** Decisions made on development within the Strategic Cultural Area should be made in view of Prince Albert’s original vision to “increase the means of industrial education and extend the influence of science and art upon productive industry”.

This should not limit evolution or innovation but the primary consideration in decision making should be the extent to which new development is in keeping with this original vision.

- 6.11** New development for cultural, education and research uses, particularly new development which will make a positive contribution to the area's special character will, subject to other policies in the Plan, be supported in principle. Other types and forms of development may also be appropriate if it can be demonstrated that they do not adversely impact on the special character of the area. It is important that the key cultural, education and research bodies and institutions within the Strategic Cultural Area continue to evolve, regenerate and improve to ensure they maintain their position as international leaders in their respective fields.
- 6.12** These policies relate to all scales of development. This includes grand and larger scale regeneration projects which represent high profile major investments which will make significant contributions to improving efficiency, quality or capacity of relevant bodies. The policies also relate to much smaller scale investments which might be ancillary to the principal operations of any given organisation but could nevertheless make an important contribution in improving on-site efficiencies and the quality of day-to-day life for workers, visitors and residents in and around the Strategic Cultural Area.
- 6.13** New uses which are ancillary to the principal cultural uses within the Strategic Cultural Area have the potential to enrich and enliven the experience of visiting, working in or living within or nearby such activities. Such ancillary uses might include cafés/restaurants or small scale retail premises which are accommodated within premises classified by their main use. Taking opportunities to make major institutions more outward looking and welcoming can come hand-in-hand with making them more open and welcoming. Such improvements might be achieved through reconfiguring existing spaces or creating new spaces which improve accessibility and openness through better quality entrance environments, the creation of more flexible and accessible spaces and promoting a diverse and engaging programme of public and outreach events. However, any ancillary commercial development will need to ensure it does not draw trade away from established commercial centres in the vicinity. Any ancillary development should not serve as an attraction in its own right and should therefore be sited, serviced and managed within the associated host institution.
- 6.14** Engagement with the community during the preparation of the Neighbourhood Plan identified an issue for local people being the desire to support local day-to-day life within the Strategic Cultural Area. Some people commented on the need for basic retailing and catering for residents, workers and students. However, any new ancillary facilities should accord with other policies within the Development Plan. Protection of residential amenity will be an important consideration. It is important to note that the institutions are responsible for the activities of their suppliers where ancillary services are provided.
- 6.15** Concerns have, however, been expressed regarding noise, litter and other nuisance generated by cafés and other similar uses, often set within the area's major cultural, education and research bodies. These cafés provide a potentially important and welcome resource for visitors, local residents, students and workers within the Strategic Cultural Quarter Area, but appropriate management regimes must be in place to ensure their daily operation does not cause local nuisance.

- 6.16** This policy conforms to London Plan Policy 4.6 (Support for and enhancement of the arts, culture, sport and entertainment); and Westminster City Plan Policy S1 (Mixed use in the Central Activities Zone).

*Activity on Exhibition Road*



**Sub-objective 6.2** Work with relevant partners to deliver an enhanced public realm within the Strategic Cultural Area which is of a quality befitting the area's world famous institutions and meets the needs of residents, workers, students and visitors

## **POLICY KBR26: PUBLIC REALM IN THE STRATEGIC CULTURAL AREA**

**6.17** The Exhibition Road environment is a result of years of planning and collaborative working between a wide range of agencies and has transformed a normal road into an exceptional public space. This has delivered radical improvements to the pedestrian links which people enjoy between the area's principal venues. Importantly, whilst these benefits have been delivered, the improvements have also enabled Exhibition Road's other important functions as a key vehicular route through the area and principal vehicular and heavy goods vehicle (HGV) access route for the main institutions in the area to continue.

**6.18** Building on the successes of Exhibition Road, a number of key opportunities have emerged to deliver further public realm improvements across the Strategic Cultural Area. These include the following:

- Re-Imagining Albertopolis – centred on the Royal Albert Hall, the area's key partners have been working closely to agree proposals to deliver significant improvements around the Hall and, in particular, improve the links between it and the Albert Memorial. Public and stakeholder consultations have been undertaken and key elements of a design agreed. Funding will need to be identified.
- The Royal College of Art (RCA) area – the RCA are considering ways to transform their main entrance, currently located in Jay Mews at the back of their building. Subject to the College securing the necessary permissions, including Listed Building Consent, re-positioning of this entrance to a more prominent and appropriate location would help to raise the profile of this key institution and improve accessibility for all users. In turn, there would be an opportunity to ensure that the building makes a more positive contribution to the immediate public realm. Any improvements to the external environment around the Royal Albert Hall should take account of the needs and aspirations of the Royal College of Art.
- Small scale complementary improvements – deliver less formal but complementary pocket spaces and seating areas more directly geared towards benefitting those who live and work in the area.
- Ongoing traffic management – continue to monitor and review the traffic management arrangements in place across the Strategic Cultural Area to ensure an appropriate balance is struck between the competing demands of all road users and to reduce the opportunity for rat running. This balance should take account of the need to allow access for local residents whilst managing the high numbers of trips generated by the high profile cultural, education and research uses within the area. Vertical physical calming measure such as speed humps are not considered appropriate. Copenhagen crossings are supported.

**6.19** Such improvements should be designed to improve the physical links between institutions through an improved public realm to help improve their operations, foster more collaborative forms of working and improve access to the area's venues for visitors, employees and residents alike.

- 6.20** The Royal Borough of Kensington and Chelsea are the responsible body for managing the carriageway of Exhibition Road. A considerable amount of debate has been undertaken regarding the management of the Exhibition Road environment. This process is encapsulated in the Royal Borough of Kensington and Chelsea's Key Decision Report dated 26 September 2011. This paper and the controls it outlines, in terms of the management of the road and the nature of the events that can be staged along its length, continue to be relevant. Importantly, the report considers the road a key space in its own right whilst recognising the change in character north of Prince Consort Road where the design of the road reverts to a more traditional form in response to the more residential nature of the road in this location.
- 6.21** In accordance with London Plan Policy 4.6 and subject to the controls agreed in the RBKC Key Decisions Report of 2011, support will be given to the hosting of temporary events and activities which can play a significant role in promoting the roles of key cultural, education and research organisations. Such activities should be appropriate to the original vision for the area and reflect the road's heritage, meaning and beauty. The Key Decision Report establishes parameters for temporary uses of the road in terms of the nature of any such event, their frequency and duration and the management arrangements that should be put in place in their delivery. This includes acknowledgement that the road should be the focus of a biennial contemporary public art exhibition and that the Exhibition Road Cultural Group act as a co-ordinating body for proposals from the institutions for events. Any such programme should contain no more than six events in any one year in the central section of the road south of Prince Consort Road and a biennial sculpture exhibition along the full length between Cromwell Road and Kensington Gore and these events be limited by the controls contained within the Key Decision Report.
- 6.22** This policy conforms to London Plan Policy 4.6 (Support for and enhancement of the arts, culture, sport and entertainment); and Westminster City Plan Policy S1 (Mixed use in the Central Activities Zone).

## KNIGHTSBRIDGE’S PUBLIC SPACES AND UTILITIES

### 7 OBJECTIVE 7.0 — ENABLE ACTIVE TRAVEL AND PERSONAL MOBILITY

7.1 The application of this collective suite of policies can contribute towards the achievement of SDGs 3: Ensure healthy lives and promote well-being for all at all ages; 7: Ensure access to affordable, reliable, sustainable and modern energy for all; and 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

Sub-objective 7.1 Active travel that is encouraged, promoted and available for everyone

7.2 In Knightsbridge there is a clear distinction between the main arterial routes that carry the majority of traffic i.e. Brompton Road, Exhibition Road, Knightsbridge, Kensington Gore, Kensington Road, Prince Consort Road and Queen’s Gate, and the smaller network of roads that are internal to the area. Both present opportunities to increase active travel.

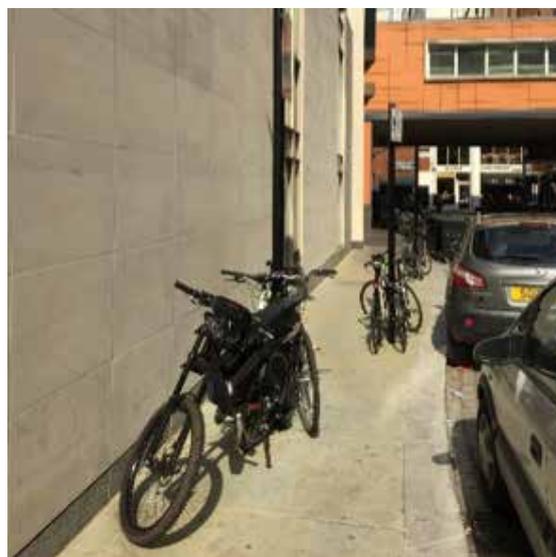
### POLICY KBR27: ENABLING ACTIVE TRAVEL

7.3 This policy seeks to ensure that new development supports opportunities for cycling and walking including those with pushchairs and wheelchairs - active travel. The dangers associated with such travel, largely as a consequence of busy roads, and the lack of supporting infrastructure and facilities, such as bicycle parking, was raised consistently during the engagement process. The policy conforms to London Plan Policies 6.9 (Cycling), 6.10 (Walking); and Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and is consistent with Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).

*Cycling in Knightsbridge*



*Lack of dedicated bicycle parking*



- 7.4** The Neighbourhood Area sits within the Central London Cycle Grid and Exhibition Road is a proposed Quietway route. The network of secondary and intimate roads in the Neighbourhood Area creates the opportunity to enhance the network overall through Knightsbridge. This links in well with London Plan Policy 6.9 (Cycling). The preferred routes would include Brompton Road, Prince Consort Road, Kensington Road/Kensington Gore/Knightsbridge and Exhibition Road (the section within the Area).

## Sub-objective 7.2 Pedestrian and mobility-impaired priority within a movement hierarchy

### **POLICY KBR28: PEDESTRIANS WITHIN THE MOVEMENT HIERARCHY**

- 7.5** Speeding vehicles, rat running, noise, danger for pedestrians and air pollution were cited in consultations as the top five traffic related problems to address particularly for small residential streets. A hierarchy approach was considered to be correct (i.e. pedestrians then cyclists then vehicles).
- 7.6** This policy seeks to maximise opportunities and safety for pedestrians (including mobility impaired), cyclists and those travelling by public transport. It conforms to London Plan Policies 6.9 (Cycling), 6.10 (Walking); and Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and is consistent with Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).
- 7.7** On arterial roads e.g. Red Routes and the Strategic Road Network, and in parallel with TfL's duty to ensure expeditious movement of traffic, opportunities to secure safe, convenient, inclusive access for pedestrians, cyclists and public transport users should be taken. It is important though that seeking to address the needs of pedestrians and cyclists does not impact detrimentally on the free flow of buses along the route network. Solutions are needed to improve cycling along Brompton Road but these should not slow buses, result in a reduction in the amount of pavement space or increase traffic congestion.

*Children walking along Exhibition Road*



- 7.8** A specific issue raised by a number of people is the general anti-social activity of pedicabs. These non-motorised vehicles regularly mount pavements and block roadways, causing difficulty for pedestrians and vehicle users. This highlights the importance of better regulation of such uses. Electric pedicabs and bicycles should also be considered.

### Sub-objective 7.3 Maximising potential for walking and cycling

- 7.9** Providing a safe and extensive cycle network is a London-wide aspiration and was confirmed as important to Knightsbridge during the engagement phase. The London Cycling Campaign investigated the potential to provide high quality space for cyclists that allow for greater and safer connections within the Area, and the main findings are outlined here.

#### Strategic Cycle Network

- 7.10** Cycling in London has doubled in 10 years, meaning that it already accounts for the movement of twice as many people daily as the DLR, and 50% more than taxis and private hire vehicles combined. If London's cycling ambition is realised, levels of cycling will double again by 2025. This will necessitate improving cycling safety and perceptions of safety. While cycling deaths in London currently run at 10-15 per year, Copenhagen (with fairly similar numbers of daily cycle trips to London) sees only around two cycle deaths per year.
- 7.11** TfL research shows that fear of injury is the main barrier to cycling in London, as it is elsewhere, and that people want to see cycle infrastructure that separates them from busy motor traffic, with separate cycle tracks substantially the preferred option. A report for TfL by UCL and Loughborough University academics<sup>27</sup> suggests that at least a third of recent London cycling deaths could have been prevented by such infrastructure.
- 7.12** Recent Canadian research<sup>28</sup> has found that roads with segregated cycle tracks carry nine times lower injury risks than do main roads with car parking and without bike infrastructure. Recent UK evidence<sup>29</sup> suggests dedicated cycling lanes can increase cycling levels – for example, the track alongside the Cambridge Guided Busway has led to substantial increases in active commuting (walking and cycling to work) among people living nearby.
- 7.13** Figure 14 shows cycle casualties between 2005-14 in and around Knightsbridge, with yellow being slight injuries, orange serious, and red deaths. It can be seen that there are at least 20 recorded injuries annually and that the major roads have particularly high casualty numbers, followed by the North-South routes, Queen's Gate and Exhibition Road.

<sup>27</sup> <http://content.tfl.gov.uk/pedal-cyclist-fatalities-in-london.pdf>

<sup>28</sup> <http://ajph.aphapublications.org/doi/pdf/10.2105/AJPH.2012.300762>

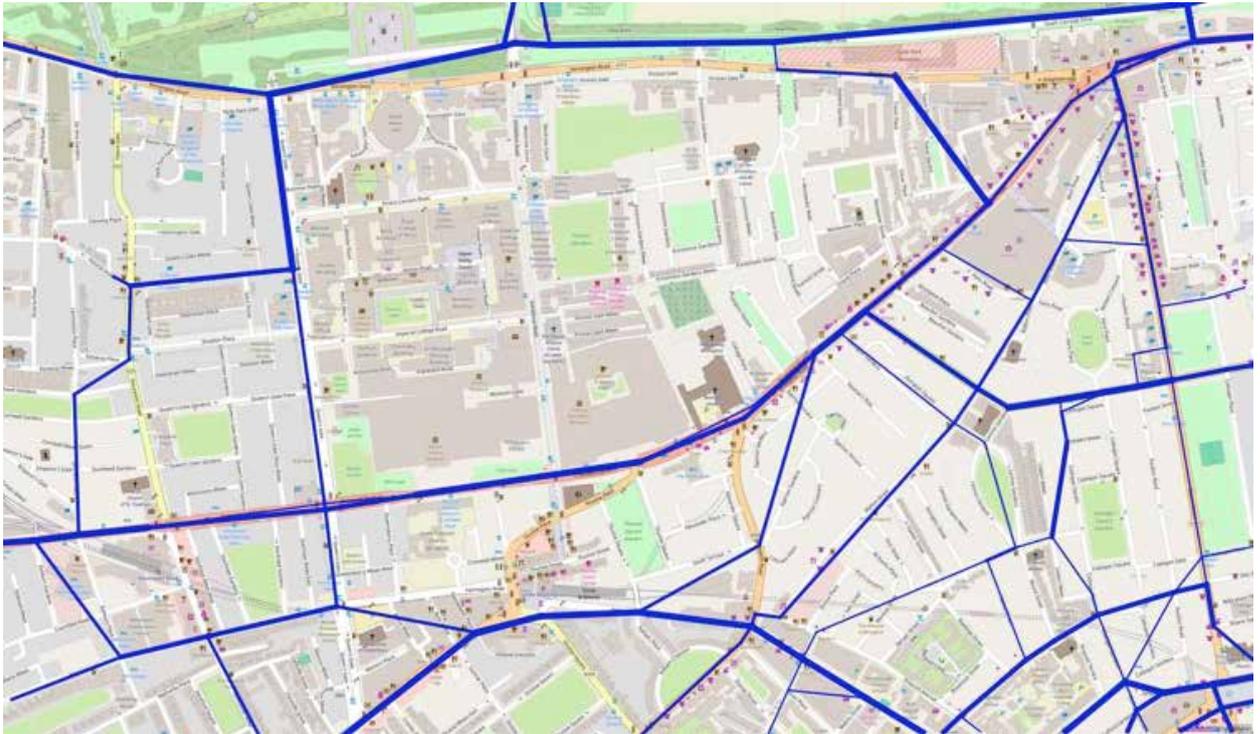
<sup>29</sup> <http://discovery.ucl.ac.uk/1476446/1/B66%20CGB%20Full%20Report.pdf>

**Figure 14: Cycling casualties 2005-2014**



- 7.14** For Knightsbridge, it is important to consider where the key desire lines for cycling might be. The Propensity to Cycle Tool<sup>30</sup> (PCT) was employed as a starting point to identify cycle commuting demand in the area, using the Government Target scenario, which involves a doubling in cycling as per the London target. Figure 15 visualises the desire lines with wider lines having higher demand (up to 3,300 cycle commuters daily).
- 7.15** There is strong demand along South Carriage Drive where a new cycle superhighway has been built. Brompton Road is also a key desire line but currently, despite its width, it has no dedicated provision for cycling and injuries are common. Therefore, providing high quality space along Brompton Road would both help reduce injury and help attract people to cycle there.
- 7.16** There is also the need to provide a good North-South cycle route through the area and the PCT indicates that Queen's Gate might be the preferred route for cycle commuters. Exhibition Road is however a potential alternative and is a 'Quietway', however, monitoring data suggest that the busiest sections of Exhibition Road see over 10,000 motor vehicles per day. This is clearly not a low-traffic route for which levels would need to be nearer 2,000 vehicles per day. Under the London Cycling Design Standards the peak vehicle flow seen on Exhibition Road would be classed as 'basic' or even 'critical', so would need substantial improvement to form a good and safe Quietway. Exhibition Road needs to be improved for cycling and Queen's Gate should be chosen for segregated cycle tracks.

**Figure 15: Cycling desire lines**



**POLICY KBR29: ASSESSING SIGNIFICANT TRANSPORT IMPACTS OF DEVELOPMENT PROPOSALS**

- 7.17** Promoting alternative modes of travel to the car was seen as important to the majority of stakeholders. A lot of comments were received about the shared space at Exhibition Road, with mixed views as to its success, but a general feeling that it was an improvement on the previous dual carriageway.
- 7.18** Residential stakeholders felt that the amenity of the Area could be further improved for pedestrians and cyclists, and the relationship with Hyde Park – the need to break the ‘wall of traffic’ along Kensington Road was an example of this.
- 7.19** Transport Assessments and Statements are ways of assessing the potential transport impacts of developments and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, it may inform the preparation of Travel Plans.
- 7.20** Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a ‘lighter-touch’ evaluation to be used where this would be more proportionate to the potential impact of the development (e.g. in the case of developments with anticipated limited transport impacts).
- 7.21** Where the transport impacts of development are not likely to be significant, it may be that no Transport Assessment or Statement or Travel Plan is required. Local planning authorities, developers, relevant transport authorities, and community organisations should agree what evaluation is needed in these circumstances.

- 7.22** This policy seeks to ensure that development proposals that might incur significant transport impacts should prepare a transport assessment. It conforms to London Plan Policies 6.9 (Cycling) and 6.10 (Walking); and Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and is consistent with Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).

*Mix of road users*



Sub-objective 7.4 Fewer and cleaner vehicles that reduce congestion and total emissions

**POLICY KBR30: MOTOR VEHICLE USE**

- 7.23** Air pollution was agreed by stakeholders as a major issue that needed to be addressed, the main cause being diesel fumes from vehicles and building emissions.
- 7.24** This policy seeks to reduce vehicle movements in the Area and conforms to London Plan Policies 5.1 (Climate change mitigation), 5.2 (Minimising carbon dioxide emissions) and 6.13 (Parking); and Westminster City Plan Policies S40 (Renewable energy) and S41 (Pedestrian movement and sustainable transport); and is consistent with Westminster UDP Saved Policies TRANS1 (Protecting the environment from the effects of transport activities), TRANS14 (Transport assessments) and TRANS21-26 (Off-street parking).

*Building works polluting on Kensington Road*



Sub-objective 7.5 Electric charging infrastructure that is future proofed

**POLICY KBR31: ELECTRIC VEHICLE INFRASTRUCTURE**

**7.25** The engagement process revealed strong support for low emission vehicles and this policy seeks to ensure the provision of electric charging facilities within new developments. It conforms to London Plan Policies 5.1 (Climate change mitigation), 5.2 (Minimising carbon dioxide emissions), 5.7 (Renewable energy) and 5.8 (Innovative energy technologies); and Westminster City Plan Policy S40 (Renewable energy); and is consistent with Westminster UDP Saved Policies TRANS1 (Protecting the environment from the effects of transport activities) and TRANS7 (Taxis and minicabs).

**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 four hour or faster electric vehicle charging points (or wireless charging facilities). Development should also contribute, where possible, towards the installation of future-proofed 30 minute or faster rapid electric vehicle charging points (or wireless charging facilities) in locations suitable for use as taxi ranks, stands or rests. This can either be physical charging stands or wireless charging facilities that are now being trialled.

*On-street electric charging point*



*Electric delivery vehicle, Cheval Place*



**7.27** Currently there are three Westminster charge points in the Area, one located on Raphael Street and two on Trevor Street. WCC have however signed an agreement with PodPoint, the charge point manufacturer that will require them to take responsibility for managing and maintaining the points and will include a process of replacement of all of their charge points across Westminster.

- 7.28** There is also a programme of work in Westminster to expand the number of charge points on street and there are around 40 new charge points that are currently being installed, although the nearest to Knightsbridge will be on Belgrave Square. There are further plans to expand the charge point network and considering the low representation in Knightsbridge the Plan will support the Area being included in future expansion.
- 7.29** WCC is trialling lamp column charging too, which essentially involves fitting a charge point to a lamp column with metering fitted into the charging cable (which belongs to the driver), to allow direct billing to the user. The advantages of this method of charging are that installation costs are much less than conventional charging posts and also installation itself is much quicker, because it just involves fitting the point to the lamp column door rather than the extensive amount of work associated with introducing a conventional charge point. Additionally, as the point is just an adaptation of existing street furniture and as it doesn't require a dedicated bay, because it will just operate from existing residents parking bays, installation won't be subject to the consultation periods required by the planning and traffic order processes. However, early experience suggests that the two charging points in Trevor Street are often blocked by non-electric cars legitimately using the residents' parking bay.
- 7.30** In the future, it is particularly important that electric or zero emission-capable taxis are promoted and one way to achieve this is to provide rapid charging points (30 minute charge or faster) for taxis in the Area. According to the Licensed Taxi Drivers Association, minicabs in London are currently being licensed at a rate of 600 per week and there are now well over 100,000 on our roads – a figure which stood at just 40,000 in 2014/15 – and this growth is unsustainable adding to congestion and pollution. Four hour or faster charging points are needed for car club and car sharing spaces to provide a zero tailpipe emission alternative to private car use.

*Car club in Prince's Gardens*



**7.31** These measures seek to address the recommendations on plan-making made by the National Institute for Clinical Excellence (NICE), in particular NICE Guideline NG70 (Air pollution: outdoor air quality and health)<sup>31</sup>. This guidance includes the following points of relevance when considering creating clean air zones:

- consider restrictions or charges on certain types of vehicles;
- support zero and low emission travel (including active travel);
- include targets to progressively reduce pollutant levels below EU limits and aim to meet WHO air quality guidelines;
- encourage walking and cycling;
- provide electric charging points; and
- encourage public and private sector organisations to use zero or low-emission vehicles for deliveries to retail, office, residential or other sites in the zone, particularly for the last mile of deliveries in city centres.

**7.32** The measures also respond to other guidance e.g. by UK Power Networks, ‘Getting electric vehicles moving<sup>32</sup>’ and ‘The impact of environment and climate change on future infrastructure supply and demand<sup>33</sup>’ published by the National Infrastructure Commission in 2017.

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<sup>31</sup> <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning>

<sup>32</sup> <http://www.ukpowernetworks.co.uk/internet/en/our-services/electric-vehicle-charging/Electric>

<sup>33</sup> <https://www.nic.org.uk/wp-content/uploads/The-impact-of-the-environment-and-climate-change-on-future-infrastructure-supply-and-demand-1.pdf>

## 8.0 **OBJECTIVE 8.0 — Encourage superb public transport**

### Sub-objective 8.1 Efficient mass transit

#### **POLICY KBR32: PUBLIC TRANSPORT**

- 8.1** This policy seeks to enhance the capacity and efficiency of public transport and conforms to London Plan Policies 6.7 (Better streets and surface transport); and Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and is consistent with Westminster UDP Saved Policies TRANS4 (Bus provision and improvement), TRANS5 (Surface, underground, rail and trams) and TRANS8 (Improved public transport access).
- 8.2** Both Knightsbridge and South Kensington Underground Stations are outside the Area, although there is a single access to Knightsbridge Underground Station next to the Mandarin Oriental Hyde Park Hotel within the Area. Access to these stations from the Area is important.
- 8.3** Proposals to improve step-free access at Knightsbridge Underground Station are being taken forward by TfL and a major improvement programme for access to South Kensington Underground Station is also being planned. These improvements are supported in principle in this respect. There would also be strong support for improvements that would reduce the impact of Piccadilly Line trains in terms of vibration and noise, which has been identified as a problem sometimes by local residents.
- 8.4** Further afield, major improvements to movement through the Crossrail 2 proposals and improved bus routes, where they will help to improve public transport movement into and out of the Area, are supported in principle.

#### *Buses on Brompton Road*



- 8.5** Bus services need to be made more efficient, with many people in the community noting how congestion and pinch points serve to slow traffic down. Policy 6.7 of the London Plan seeks to allocate road space towards bus uses and this is supported.
- 8.6** The application of this policy can contribute towards the achievement of SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

## 9 OBJECTIVE 9.0 — ENCOURAGE SUPERB UTILITIES AND COMMUNICATIONS INFRASTRUCTURE

Sub-objective 9.1 Exemplary utilities and connectivity

### POLICY KBR33: UTILITIES AND COMMUNICATIONS INFRASTRUCTURE

- 9.1** It is considered that ‘utilities’ include the following and their successors in technology: electricity for public or private use; gas; internet; telecommunications; television; and clean, dirty and storm water networks.
- 9.2** This policy makes provision for adequate utilities infrastructure to be in place and conforms to London Plan Policies 5.4A (Electricity and gas supply) and 5.13 (Sustainable drainage); and Westminster City Plan Policies S39 (Decentralised energy networks) and S40 (Renewable energy).
- 9.3** The application of this policy can contribute towards the achievement of SDG 9: build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.

#### Localised flooding

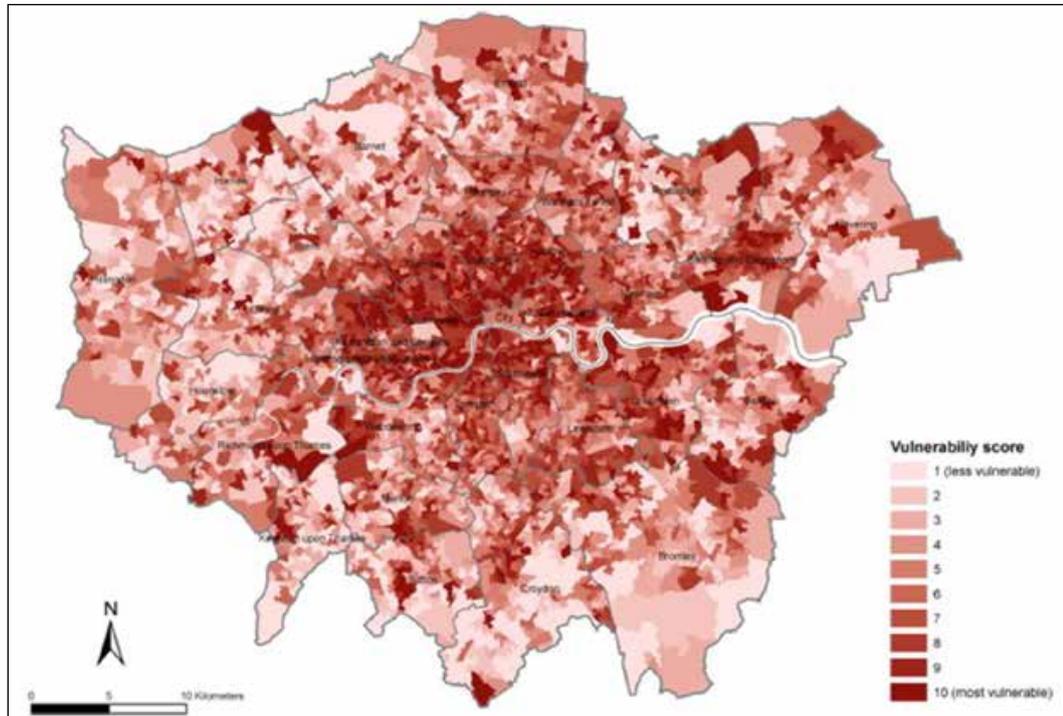
- 9.4** Localised flooding and drainage were a concern among some residents, with incidents at a number of storm drains recorded and suggesting systemic and serious failings e.g. within the Montpeliers and Trevors and along Prince’s Gardens and Ennismore Gardens. One knowledgeable stakeholder emphasised the seriousness of current drainage and sewerage problems and said much work is needed to achieve a ‘sustainable drainage’ system.

#### *Localised flooding in Stirling Street and Prince’s Gardens*



- 9.5** The exposure to high temperatures and heatwaves is one of the greatest direct climate change-related threats for the UK. According to the UK Climate Change Risk Assessment 2017, heatwaves in the UK like that experienced in 2003 are expected to become the norm in summer by the 2040s. In combination with the growing, ageing population, the number of heat-related deaths in the UK is projected to increase by around 250% by the 2050s (median estimate), from a current annual baseline of around 2,000 premature heat-related deaths per year.

**Figure 16: Spatial distribution of the heat vulnerability across Greater London as categorised by 10 heat vulnerability classes**



Source: Tanja Wolf, Glenn McGregor, *The development of a heat wave vulnerability index for London, United Kingdom, Weather and Climate Extremes, Volume 1, September 2013, Pages 59-68*

- 9.6** Figure 16 shows that a part of the Neighbourhood Area (e.g. the area near the Brompton Road) is classified as vulnerable to overheating. The Knightsbridge and Belgravia Ward has a higher percentage of population aged over 65 compared to the average in the City of Westminster (Westminster City Council, 2015), who are more sensitive to health risks posed by high temperatures and heatwaves as they may stay at home during the daytime. This constitutes significant health risks and may lead to longer-term wellbeing impacts for residents in the Area in the timescale of the Neighbourhood Plan and beyond.
- 9.7** At present, there are no comprehensive policies in the UK to reduce the risk of overheating in new and existing homes or other buildings, apart from promoting urban greening measures. London Plan Policy 5.9 has set out a cooling hierarchy to prevent overheating over the scheme's lifetime. The Greater London Authority (GLA) also issued the Sustainable Design and Construction Supplementary Planning Guidance in 2014. The Chartered Institute of Building Services Engineers (CIBSE), working in conjunction with the GLA, also developed the Design Summer Years for London (TM49: 2014) to provide a risk-based approach guidance for developers to address the challenges of urban heat island effects and an uncertain future climate.

## Broadband

- 9.8** Additionally, many residents felt that the broadband speeds were well below what they should be for a central London location.

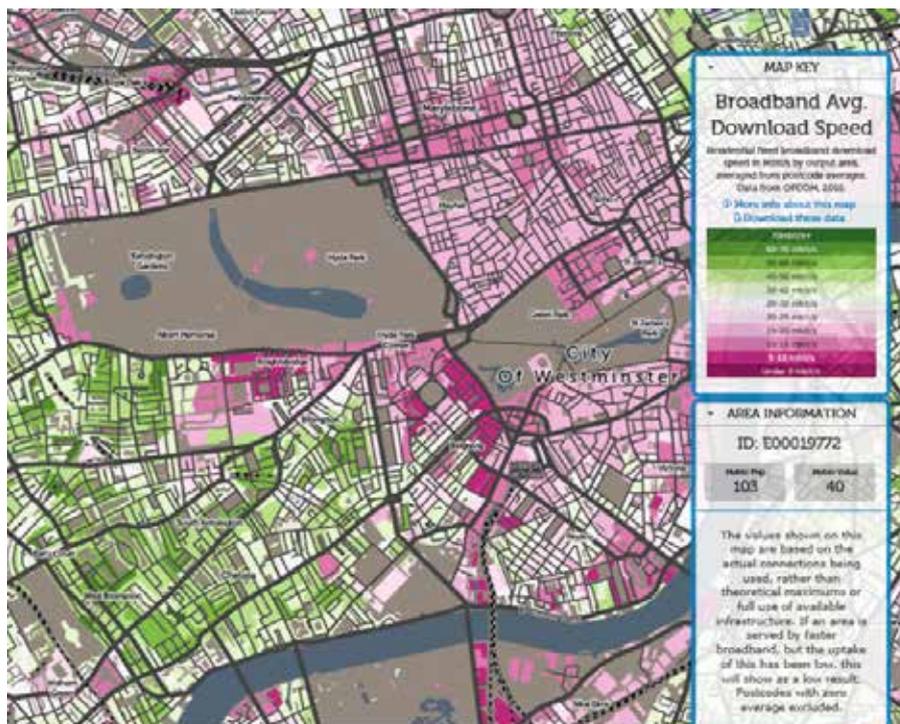
A recent study<sup>34</sup> on London’s broadband gap was revealed for the Consumer Data Research Centre by University College London, using average residential download speeds from regulator Ofcom. The data reveals that users in much of the Area are experiencing relatively low broadband download speeds, as illustrated in Figure 17. Given that, in September 2017, the Government announced the trialling of ‘full fibre broadband’ which can provide data at speeds close to one gigabit per second (Gbps), Knightsbridge could fall even further behind unless the situation is radically improved.

9.9 WCC is committed to rolling out ultrafast broadband and in 2017, it was rolled out to over 1,800 homes on the Churchill Gardens Estate. The new service provides download speeds of up to 1,000 Mbps (1 Gbps) – putting the estate in the top 2% in the UK for connectivity. This means that residents can enjoy a greater amount of internet streaming for their home entertainment or business activities. Last year, Community Fibre also completed installation of Gigabit broadband to over 1,000 homes in the Grosvenor Estate area.

*New fibre broadband for business in Cheval Place*



**Figure 17: Average broadband download speeds in the Area**



34 <https://www.standard.co.uk/news/techandgadgets/revealed-londons-fastest-areas-for-broadband-suburbs-have-superfast-internet-while-packed-urban-a3580021.html>

## KNIGHTSBRIDGE'S ENVIRONMENT AND PEOPLE

### 10 **OBJECTIVE 10.0 — BE AN EXEMPLAR IN SUSTAINABLE CITY LIVING BY COMPLYING FULLY WITH INTERNATIONAL LAWS, STANDARDS, GUIDELINES AND BEST PRACTICES**

Sub-objective 10.1 Healthy air which is fit to breathe and use of renewable energy which does not hasten climate change

- 10.1** The application of this collective suite of policies can contribute towards the achievement of SDGs 3: Ensure healthy lives and promote well-being for all at all ages; 6: Ensure availability and sustainable management of water and sanitation for all; 7: Ensure access to affordable, reliable, sustainable and modern energy for all; 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation; 11: Make cities and human settlements inclusive, safe, resilient and sustainable; 12: Ensure sustainable consumption and production patterns; 13: Take urgent action to combat climate change and its impacts; 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss; and 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

#### **POLICY KBR34: HEALTHY AIR**

- 10.2** There was strong recognition that Knightsbridge is one of the worst places for air pollution in London. This policy seeks to minimise impacts of development on air quality and conforms to London Plan Policy 7.14 (Improving air quality); and Westminster City Plan Policies S28 (Design) and S31 (Air quality); and is consistent with Westminster UDP Saved Policy ENV5 (Air pollution).

#### *Smog over London*



Source: Flickr under Creative Commons

- 10.3** As is recognised in the Westminster City Plan, the borough has some of the poorest air quality in the United Kingdom with concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>2.5</sub> and PM<sub>10</sub>) regularly exceeding guidelines which are set by the World Health Organisation (WHO) to protect human health. Legally binding 'limit values' align to the WHO's NO<sub>2</sub> guidelines and are set at about twice the guidelines for particulates. Knightsbridge suffers from particularly poor air quality. It is widely acknowledged that poor ambient air quality has led to thousands of premature deaths in London alone<sup>35</sup>. Air pollution can cause disease from stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases, including asthma<sup>36</sup>. Children who suffer poor air quality may have reduced lung capacity in adulthood<sup>37</sup>. In addition, those on low incomes are often more at risk from the health impacts of air quality. Residents, workers, and visitors should have an atmosphere which is safe. Poor air quality also affects flora and fauna<sup>38</sup>. For these reasons development should seek to improve air quality, indoors and outdoors, wherever possible. Development which would lead to the significant deterioration of air quality above limit values is unlawful.
- 10.4** Annual mean and hourly concentrations of NO<sub>2</sub> in Brompton Road also far exceed the limit values in the Air Quality Standards Regulations 2010 and Directive 2008/50/EC on ambient air quality and cleaner air for Europe which have been in legislation since 1999 to be achieved by 1 January 2010. For example, annual mean concentrations of NO<sub>2</sub> in Brompton Road were 80 micrograms per cubic metre (ug/m<sup>3</sup>) in the year ending 31 December 2016 compared with the legal limit of 40 ug/m<sup>3</sup>. In addition, there were 262 exceedances of the NO<sub>2</sub> hourly limit value in the same period compared with the legal limit of 18. The main sources of NO<sub>2</sub> include diesel vehicles and gas heating and cooking. The Supreme Court has confirmed that limit values must be achieved as soon as possible and irrespective of cost. It is vital therefore that all steps are taken quickly to reduce emissions of oxides of nitrogen (NO<sub>x</sub>) (and PM<sub>2.5</sub>) through planning policy. The McCracken QC opinion, donated to the Forum by the Clean Air in London campaign, explains the position.
- 10.5** Similarly, proposals should not deliberately expose people to the dangers of air pollution. Tables and chairs outside restaurants, bars and cafés, particularly along Brompton Road, will potentially do this. Therefore, tables and chairs should only be permitted to be placed on the pavement if the WHO guideline for hourly exposure to NO<sub>2</sub> is unlikely to be exceeded in that location i.e. 200 ug/m<sup>3</sup>. This policy addresses the possibility that customers might sit for more than one hour or make multiple visits. It also seeks to minimise staff exposure.
- 10.6** Policy KBR34 applies to all new development.

### **POLICY KBR35: RENEWABLE ENERGY**

- 10.7** Reducing energy consumption featured strongly in the engagement with support extended to solar panels on all refurbished or re-developed buildings as well as consideration for district heating and ground and air source heat pumps.

<sup>35</sup> [https://www.london.gov.uk/sites/default/files/hiainlondon\\_kingsreport\\_14072015\\_final.pdf](https://www.london.gov.uk/sites/default/files/hiainlondon_kingsreport_14072015_final.pdf)

<sup>36</sup> <http://www.who.int/mediacentre/factsheets/fs313/en/>

<sup>37</sup> Ibid

<sup>38</sup> [http://www.rotap.ceh.ac.uk/files/CEH%20RoTAP\\_0.pdf](http://www.rotap.ceh.ac.uk/files/CEH%20RoTAP_0.pdf)

- 10.8** This policy aims to match the ambitions of the Paris Agreement and mitigate climate change. It encourages zero air emissions locally, energy efficiency and on-site and off-site renewable energy use excluding fossil fuel or nuclear energy sources. ‘Good Energy’, for example, offers 100% renewable electricity today. KBR35 prioritises action on new development and more sustainable refurbishments in order to maximise the opportunities and minimise the long term costs of reducing greenhouse gas and air pollutant emissions throughout the Area. This approach recognises the possibility that all buildings in the Area may need to achieve or approach zero emissions to air, locally and at its energy source, by the end of the Plan period in order to mitigate climate change. This policy also supports the community’s vision and objectives to be an exemplar in sustainable city living.
- 10.9** As an example, Imperial College London published research into its energy use in 2016, revealing that only 10% of its energy stems from renewables. It is actively looking into ways to improve this, lessons from which will be helpful in rolling out this policy more widely. A key consideration should be the need to address air emissions holistically i.e. not reduce greenhouse gas emissions at the expense of air quality or vice versa.
- 10.10** Clause C of the policy states ‘If renewable energy cannot reasonably be used, then gas boilers achieving the lowest dry NO<sub>x</sub> emissions (measured at 0% excess O<sub>2</sub>) should be selected’. A selective review of boiler/water heaters with their stated NO<sub>x</sub> rating was undertaken to establish what ratings are possible. This study revealed that heaters emitting below 30mg/kWh are available. Larger buildings, with greater heating and water needs, may require larger units.
- 10.11** There is evidence that developers would prefer to use electricity rather than boilers or combined heat and power units using fossil fuels to address their full energy needs. One developer told the Forum that its planning application had only included gas units in order to maximise sustainability points which perversely reward developers for installing decentralised power generation even in the most polluted places far exceeding limit values. Policy KBR35 seeks to address this matter by supporting energy efficiency and electricity use and offsetting the incentive to install decentralised fossil fuel units.
- 10.12** This policy supports and is complementary to KBR34 and conforms to London Plan Policy 5.7 (Renewable energy); and Westminster City Plan Policies S28 (Design) and S40 (Renewable energy).

#### Sub-objective 10.2 Increasing the energy efficiency of historic buildings

### **POLICY KBR36: RETROFITTING HISTORIC BUILDINGS FOR ENERGY EFFICIENCY**

- 10.13** As noted in the previous policy, sustainability was an important issue for stakeholders.
- 10.14** The large numbers of flats, older properties, and properties in Conservation Areas means that the stock of buildings as a whole within the Area are significantly less energy efficient than newer building with more sustainability features. In Westminster, buildings with energy ratings of C, D, and E accounted for respectively 36.5%, 34.9%, and 13.6% of the total number of buildings<sup>39</sup>.

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<sup>39</sup> Source: London Data Store

- 10.15** A WCC report entitled ‘Retrofitting Historic Buildings for Sustainability’ (2013) reported that buildings accounted for approximately 90% of carbon emissions in Westminster. In order to contribute to the UK’s commitment of an 80% reduction in carbon emissions by 2050 and the London target of 60% by 2025, these low-efficient buildings have to be refurbished along with the construction of new ‘zero carbon’ buildings. Unless action is taken urgently and collectively to reduce greenhouse gas emissions, these reductions may increase and timescales shorten as the total global carbon budget to limit temperature change to 2 degrees centigrade is expended.
- 10.16** In Westminster, the listed buildings and some buildings in the conservation area are sensitive to any refurbishment due to the stringent conservation requirements set out in the National Planning Policy Framework. KBR36 seeks to achieve reductions in air emissions in a sensitive manner.
- 10.17** This policy conforms to London Plan Policy 5.2 (Minimising carbon dioxide emissions) and Westminster City Plan Policy S40 (Renewable energy).

Sub-objective 10.3 Enabling the natural environment to flourish

### **POLICY KBR37: NATURAL ENVIRONMENT**

- 10.18** Access to green space within the Area is important to local people and was a strong theme running throughout the engagement process. This included providing ‘green pockets’ wherever possible, with innovative ideas including green roofs and walls. It was important to some stakeholders that native species should be encouraged.
- 10.19** There are many examples to draw from when considering the incorporation of green space within new and existing development:

#### **Pocket Parks**

- 10.20** These form a key component of the Mayor’s London’s Great Outdoors, the programme to improve streets, squares, parks, and canal and riverside spaces across London. Pocket parks are small areas of inviting public space for all people to enjoy, providing relief from the hustle and bustle of the city.

*Lancaster Court, Hammersmith  
and Fulham*



*St. Giles’ Churchyard, Camden*



**10.21** These spaces have trees and greenery; they are open to all; they have places to sit and relax and for people to come together; and they contribute to making the city friendlier, greener and more resilient. So far, about £2 million of pocket park funding has been allocated to over 100 parks in 26 London boroughs. At the moment, there are no pocket parks in Westminster.

### Pop up Parks

**10.22** An idea born in San Francisco in 2005, pop up parks are temporary areas set to green space – often the size of a parking space, and often indeed a parking space – to ameliorate the urban area. Each temporary parking spot renovation is sponsored by a local business or organisation, and each location has an individualised theme.

**10.23** A good example is Bristol which, like many cities, had places which did not feel like inviting spaces to move through, or to play and socialise in. By converting one or two parking spaces on a street the Street Pockets project has been helping residents to change their local streets into more vibrant public spaces, while also remind passing traffic that this is a place where people live and to slow down.

*Bristol Street Pockets project*



*Washington DC*



credit: my.parkinday.org

**10.24** This policy conforms to London Plan Policy 2.18; and Westminster City Plan Policies S11, S35, S36, S38 (Green infrastructure: the multifunctional network of green and open spaces); and is consistent with Westminster UDP Saved Policies ENV15 (Public and private open space) and ENV17 (Nature conservation and biodiversity).

### Sub-objective 10.4 Maximising the environmental benefits of trees

#### **POLICY KBR38: TREES**

**10.25** Trees featured strongly throughout the engagement process for the Plan, in terms of protecting, managing and maintaining existing ones, and encouraging the planting of new ones. This policy seeks to address this and confirms to London Plan Policy 7.21 (Trees and woodlands); and is consistent with Westminster UDP Saved Policy ENV16 (Trees and shrub cover).

- 10.26** WCC's Supplementary Planning Guidance, 'Trees and Public Realm – A Tree Strategy for Westminster'<sup>40</sup>, provides guidance. However, in light of the importance of trees to Knightsbridge's biodiversity and environment generally, it is considered that guidance should be brought into policy to provide clear direction on the management and planting of trees.
- 10.27** Management of trees is important. The Plan encourages those managing Local Green Spaces and others to prepare a Tree Management Plan at five yearly intervals that defines a vision for the space and a planting and maintenance programme to achieve it. The planting plan should address opportunities and the risks of climate change, disease and pests and the need to stagger the age profile of the tree stock. Maintenance is also important. For example, contractors pruning trees should leave as many chippings on site as possible which allows the leaves and branches to remain as they would in their natural environment. The provision of eco piles is also encouraged because it is not possible to leave dead wood in the tree canopies and such piles provide a favourable environment for bird and bee populations. The provision of a schedule describing the retention / removal / disposal of tree clippings is also encouraged. Burning or open fires are not considered an acceptable means of waste disposal in the Neighbourhood Area including Local Green Spaces. The Forum estimates that a Tree Management Plan would cost about £1,000 to produce (2017).
- 10.28** Management also includes the need to regularly prune trees and bushes that are left out of control and block pavements. All pavements must be fully accessible at all times and sites that are not in use should be adequately maintained by owners.
- 10.29** Policy KBR10 (Urban greening) requires landscaping and tree planting to be an intrinsic part of new development proposals. Whilst some types of minor development such as small extensions cannot be expected to make such provision, many new developments should provide more greening as part of well-designed schemes.
- 10.30** As part of this, any development that would result in the loss of an existing tree in one of the squares (all identified as Local Green Spaces in Policy KBR11), even if it is to be replaced, should be encouraged to produce a Tree Management Plan for all the trees in the square. This should consider not only where any tree should be replaced but with what species of tree it should be replaced and how this will be managed within the wider context of the entire population of trees in the square. This consideration of the wider context of any tree planting is important in preserving not only the character of Knightsbridge through a resilient tree population that is in keeping locally, but in enhancing biodiversity as well.
- 10.31** In addition, it will be important to ensure a diverse mix of species to reduce risk from disease, pests or climate change. Currently in London the plane tree predominates, a species that has been devastated by 'plane wilt' in other cities such as Lyon, France. The threat of tree disease is very real<sup>41</sup>. The Food and Environment Research Agency, part of Defra, published a Rapid Pest Risk Analysis within the UK Plant Health Risk Register, for the plane tree in 2013. It revealed that London plane trees in urban environments are particularly at risk with a tenth of all London trees in Greater London being plane trees. It is not a case of simply replacing these trees with other species but making sure that over time a more diverse tree population is developed that is more able to survive in a changing climate whilst maintaining the attractiveness of the tree cover in Knightsbridge. This could include other species such as chestnut, catalpa, quercus and lienco.

<sup>40</sup> [http://transact.westminster.gov.uk/docstores/publications\\_store/Trees\\_&\\_the\\_Public\\_Realm\\_Adopted\\_Strategy\\_September\\_2011.pdf](http://transact.westminster.gov.uk/docstores/publications_store/Trees_&_the_Public_Realm_Adopted_Strategy_September_2011.pdf)

<sup>41</sup> <http://www.telegraph.co.uk/news/2016/07/30/tree-disease-could-wipe-out-londons-most-historic-vistas/>

*Evidence of diseased trees being removed in Hyde Park, 2017*



*London plane trees*



Source: Flickr under Creative Commons

- 10.32** The policy protection for existing trees contained in Westminster UDP Saved Policy ENV16 recognises the importance of achieving a more balanced range of species through replanting. However, this needs to be more specific because urban planting, by its very nature, is an activity for the long term.
- 10.33** Existing trees should be protected and properly managed, as well as safeguarding trees that are subject to Tree Preservation Orders (TPOs). New development adjacent to existing trees needs to take account of their presence, both through the design of the new development and its construction. Existing trees should only be removed in exceptional circumstances and in accordance with good arboricultural practice and to ensure that adequate and appropriate replacement tree planting places are identified and confirmed before any trees are removed.

*Overgrown trees making a pavement difficult to pass*



### Sub-objective 10.5 Secure sustainable water supplies

#### **POLICY KBR39: SUSTAINABLE WATER**

- 10.34** This policy seeks to enable reduced water consumption, encourage sustainable drainage, reduce impacts on existing underground streams and minimise water pollution. It conforms to London Plan Policies 5.14 (Water quality and wastewater infrastructure), 5.15 (Water use and supplies).
  
- 10.35** Household water use is a testing ground for creating the strategies and social behaviours necessary for water use reduction in agriculture and industry. Householders are the largest growing consumers of water, yet householders should have the greatest ability to influence the amount of water that they use. The way in which development is designed (and the particular components such as taps that are used) can play a part in assisting householders in reducing their consumption of water. Development should therefore be designed to ensure that total water consumption is reduced.
  
- 10.36** The impacts that water has on London and may have in the future are potentially severe and linked with other environmental policies and issues, in particular climate change. Flooding is identified as a particular concern in the Westminster City Plan for instance.
  
- 10.37** In Westminster, surface water flooding (SWF) occurs because of a significant amount of impermeable surface, blockages or breakages in water pipes or where drainage capacity has been exceeded. SWF can happen quickly, and the magnitude and frequency are expected to increase as climate change increased the intensity of rainfall in UK (WCC, 2015). According to the Environment Agency’s Long Term Flood Risk Information website, the probability of SWF ranges from medium to high in areas such as Brompton Square, alongside Brompton and Cromwell Road, Queen’s Gate and the surrounding area of Victoria and Albert Museum, as shown in Figure 18 below.

**Figure 18: Future surface water flood risk**



- 10.38** Development should therefore increase the capacity and resilience of the network locally and further afield where possible e.g. the use of non-return valves should be considered.
- 10.39** There is also growing concern about the quality of the water and the amount of pollutants that are discharged from households and other buildings into the riparian system. Development should therefore include measures which reduce the impact of solids and ‘down the drain’ chemical pollutants and manufactured solids e.g. bleach, cooking fats, ‘microbeads’ and wipes.
- 10.40** A small part of the Neighbourhood Area falls within groundwater Source Protection Zones (SPZ) 1 and 2. An SPZ is an area of groundwater where there is particular sensitivity to pollution risks due to the proximity of a drinking water source and they are used to protect abstractions for public water supply. Any new development proposed within an SPZ should therefore ensure that there is no unacceptable risk to groundwater.

#### Sub-objective 10.6 Healthy people who need and thrive in a healthy environment

### **POLICY KBR40: HEALTHY PEOPLE**

- 10.41** The purpose of this policy is to set out the conditions required to ensure a tranquil environment in the Area, something which was raised as important among stakeholders. It conforms to London Plan Policy 3.2 (Improving health and addressing health inequalities); Westminster City Plan Policies S29 (Health, safety and well-being) and S32 (Noise); and is consistent with UDP Saved Policies ENV5 (Air pollution), ENV6 (Noise pollution) and ENV7 (Controlling noise from plan, machinery and internal activity).
- 10.42** Knightsbridge’s construction activity policy (KBR22), aims to contribute towards a target reduction in ambient and nuisance noise of 5dB every five years towards the WHO guideline dB. This should be read alongside the City of Westminster’s Code of Construction Practice and the Considerate Constructors Scheme to ensure that the impact of traffic and construction on residential amenity will be adequately mitigated.
- 10.43** Development should be advised by good practice such as that provided in the Professional Practice Guidance on Planning and Noise (ProPG) for residential development and BS4142:2014 where commercial noise is present on the site and considered ‘dominant’<sup>42</sup>.
- 10.44** It is particularly important that matters such as noise are addressed by development or refurbishment related to commercial activity (Policy KBR14). This should reflect the requirements of the Mayor’s draft supplementary planning guidance on ‘Culture and the night time economy’. This recognises the ‘agent of change’ principle which makes in the responsibility of developers of housing near existing leisure venues to be responsible for noise management. It states that development proposals, ‘...should seek to manage noise without placing unreasonable restrictions on development or add unduly to the costs and administrative burdens of existing businesses.’

<sup>42</sup> Association of Noise Consultants, Institute of Acoustics and Chartered Institute of Environmental Health (2017) ProPG: Planning & Noise, Professional Practice Guidance on Planning & Noise, New Residential Development

*Activity in Hyde Park*



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## Appendix

### Transforming our world: the 2030 Agenda for Sustainable Development

- A1. The United Nations has launched a 'new universal agenda' for humanity. The 2030 Agenda builds upon the principles and goals laid out in Agenda 21, expanding them from a purely environmental focus to all areas of humanity. The intention is that it will provide a blueprint for global government.
- A2. The 2030 Agenda sets out 17 Sustainable Development Goals and 169 specific sustainable development targets.
- A3. On 1 January 2016, these 17 Sustainable Development Goals (SDGs) of the 2030 Agenda for Sustainable Development — adopted by world leaders in September 2015 at an historic UN Summit — officially came into force. Over the next 15 years, with these new Goals that universally apply to all, countries will mobilise efforts to end all forms of poverty, fight inequalities and tackle climate change, while ensuring that no one is left behind.
- A4. The Goals and targets will stimulate action in the following areas:

#### People

We are determined to end poverty and hunger, in all their forms and dimensions, and to ensure that all human beings can fulfil their potential in dignity and equality and in a healthy environment.

#### Planet

We are determined to protect the planet from degradation, including through sustainable consumption and production, sustainably managing its natural resources and taking urgent action on climate change, so that it can support the needs of the present and future generations.

#### Prosperity

We are determined to ensure that all human beings can enjoy prosperous and fulfilling lives and that economic, social and technological progress occurs in harmony with nature.

#### Peace

We are determined to foster peaceful, just and inclusive societies which are free from fear and violence. There can be no sustainable development without peace and no peace without sustainable development.

#### Partnership

We are determined to mobilize the means required to implement this Agenda through a revitalised Global Partnership for Sustainable Development, based on a spirit of strengthened global solidarity, focussed in particular on the needs of the poorest and most vulnerable and with the participation of all countries, all stakeholders and all people.

A5. The interlinkages and integrated nature of the Sustainable Development Goals are of crucial importance in ensuring that the purpose of the new Agenda is realised. If we realize our ambitions across the full extent of the Agenda, the lives of all will be profoundly improved and our world will be transformed for the better. The 17 SDGs are:

Goal 1: End poverty in all its forms everywhere.

Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture.

Goal 3: Ensure healthy lives and promote well-being for all at all ages.

Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

Goal 5: Achieve gender equality and empower all women and girls.

Goal 6: Ensure availability and sustainable management of water and sanitation for all.

Goal 7: Ensure access to affordable, reliable, sustainable and modern energy for all.

Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.

Goal 10: Reduce inequality within and among countries.

Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

Goal 12: Ensure sustainable consumption and production patterns.

Goal 13: Take urgent action to combat climate change and its impacts.

Goal 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development.

Goal 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss.

Goal 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

Goal 17: Strengthen the means of implementation and revitalise the global partnership for sustainable development.