

# KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

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20 December 2018

Dear Councillor Beddoe

## **Representations on the Draft Westminster City Plan 2040**

Thank you for meeting me recently with your officers for a positive discussion about local planning.

I am writing on behalf of the Knightsbridge Neighbourhood Forum (the 'Forum') to make representations in response to the consultation on the Draft Westminster City Plan 2019 – 2040 ('WCP') (the 'Consultation'):

<https://www.westminster.gov.uk/cityplan2040>

The Forum welcomes the opportunity to respond to the Consultation and wishes to make representations on certain matters in the WCP which it considers will improve the WCP and help Westminster City Council (the 'Council' or 'WCC') to better achieve its objectives and to align with other development plan documents, including neighbourhood plans. The Forum's representations have been informed by the Knightsbridge Neighbourhood Plan (the 'KNP') which passed referendum on 18 October 2018 and was 'made' (adopted) by the Council on 11 December 2018. The made KNP can be seen here:

<https://www.westminster.gov.uk/NP-knightsbridge> and <http://www.knightsbridgeforum.org>.

## **Overview**

The Forum supports the WCP subject to detailed comments which follow. In general, for example:

- the strategic nature of the WCP and its approach to policies is supported as it allows neighbourhood forums to develop locally specific policies;
- the WCP seems positive for neighbourhood planning and should add impetus to the KNP; and
- the WCP should encourage other neighbourhood forums to progress their plans.

More specifically, we are pleased to see that the WCP:

- retains the role of the Central Activities Zone (CAZ), which covers the whole of the Knightsbridge Neighbourhood Area (Knightsbridge Area);
- retains the role of the ‘International Centre’ in Knightsbridge (which is called the ‘International Shopping Centre’ in the current City Plan);
- confirms the strategic housing allocation for the Area;
- recognises that most of Westminster is not suitable for higher buildings as they would adversely impact on local character; and
- recognises the urgent importance of ‘neighbourly’ development and sustainability.

We are pleased that the first three of these points would likely avoid the need for the Forum to consider whether it needs to undertake an early review of the KNP to take account of similar strategic policies in the draft London Plan that affect the Knightsbridge Neighbourhood Area (e.g. the Central Activities Zone, Town Centres and housing delivery related policies).

### **Raising the WCP’s ambition level to achieve sustainable development**

The City of Westminster and London face major challenges over the period to 2040. We are concerned therefore that some of the WCP’s policies, as currently drafted, would limit ambition. For example:

- insist upon/require no reduction in air pollution (WCP Policy 32 ‘Managing air quality’);
- allow or encourage the bare minimum of a range of SuDS standards to be achieved (WCP Policy 33 ‘Managing flood risk’);
- react to the problems caused by development rather than pro-actively anticipating and managing risk (e.g. WCP Policy 33, WCP Policy 34 and WCP Policy 36); and/or
- otherwise encourage incremental approaches by developers when more ambition is needed.

The Forum believes that the WCP needs to:

- have a clear strategic end point in mind for 2040 for each policy e.g. ‘zero air emissions’ from the entire building stock by 2040;
- allow and enable the most far-sighted developers (and neighbourhood forums) to achieve similar end points as soon as possible and perhaps immediately e.g. through their actions or local policies (while remaining in ‘general conformity’ with the WCP and London Plan); and
- actively encourage all development to achieve those end points by 2040.

The Forum believes it has achieved the above in the KNP by ‘nudging’ development – major and medium development and substantial refurbishments – towards end points consistent with sustainable development. For example, please see KNP policies on air, construction, energy, transport, trees, urban greening, utilities, waste and water as well as those on character and community. Every policy in the KNP aligns to one or more of the United Nations Sustainable Development Goals; and the WCP should do the same.

In many cases, the WCP can achieve the above by simply spelling out the City’s challenges over the lifetime of the plan in the reasoned justification text and making small changes to the policy drafting e.g. adding ‘at least’ before ‘air quality neutral’ in WCP Policy 32 ‘Managing air quality’ e.g. in ‘Major developments in Westminster will be **at least** air quality neutral’. See further detailed drafting later.

The Forum urges WCC to take the opportunity offered in the WCP to make Westminster an exemplar borough now and ensure the City's success in 2040.

The above themes and the WCP are supported subject to the detailed comments below.

### **UDP saved policies**

The Forum understands that the Council's intention is that the WCP is a complete revision that, upon adoption, would replace all policies in the previous City Plan and the Unitary Development Plan (UDP) saved policies.

The Forum agrees that the new City Plan should replace all the UDP saved policies. This should be made clear in the Regulation 19 consultation version of the WCP. However, it will be important not to downgrade the significance of some of the evidential documents supporting important aspects of the saved policies such as the Conservation Area Audits, which identified Character Areas, local views and unlisted buildings of merit. Another example is Map 3.2, referred to in UDP saved policy H5, which identifies parts of Knightsbridge for the protection of single dwelling house houses. Please see also KNP Policy KBR1.

The loss of UDP saved policies has implications for the KNP. A number of the KNP Policies specifically refer to UDP saved policies (e.g. KBR5 ('Local buildings and structures of merit') refers to DES 9). The WCP should provide a table showing which WCP policies replace which 'strategic' saved policies. This should then be supported in the reasoned justification in the WCP (e.g. paragraph 39.3) with a clear statement that the Conservation Area Audits and neighbourhood plans identify other locally important features and structures.

### **Specific comments**

The strategic nature of the WCP and its approach to policies is supported since it is supplemented in the Knightsbridge Neighbourhood Area by the KNP. The KNP provides a range of detailed policies specific to the character and function of the Knightsbridge Neighbourhood Area.

However, the Forum is concerned that areas of important detail in relation to the WCP are yet to be published and will impact on the interpretation and consideration of specific policy areas. The WCP states, for example, that supplementary guidance will be produced in support of WCP Policy 40 ('Density and Building Height') which is one of the policy areas of most interest to the Forum e.g. in relation to the possible strategic development of the Hyde Park Barracks land.

In addition, the Implementation and Monitoring section of the WCP states that additional information, including technical notes and supplementary planning documents (SPDs) will be prepared to implement the policies effectively. It is unclear what policy areas these notes and SPDs will cover and the extent to which they will add additional layers of detail beyond the strategic policies. As such, it is vital that these documents are published as soon as possible (and no later than the start of the Regulation 19 consultation) for the Forum to be able to come to a view on the potential application of the draft policies in site specific circumstances.

Additionally, the Council has not published its Annual Monitoring Report (AMR) for some time so it is difficult to understand how successfully the current adopted policy framework is being delivered and how, if at all, it should be changed.

Separately, please define in the WCP's glossary 'Neighbourhood plan' (in addition to 'Neighbourhood forum'). Please also make clear that references to 'Major development' in WCP policies include both 'small scale' and 'large scale' development as defined in the WCP's glossary. 'Minor development' such as referred to in WCP Policy 36 should also be defined in the glossary.

The Forum is also pleased to see that many of the emerging policies of the WCP support the achievement of the 10 objectives in the KNP. Under each of those objectives, the Forum wishes to make the following representations:

***Objective 1: 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***

As previously mentioned, the adoption of the WCP would mean the replacement of the UDP saved policies. This includes Policy DES15 ('Metropolitan and Local Views') which protects against any adverse effects upon important views that have been identified within the Council's Conservation Area Audits. In Knightsbridge there are a number of these views and the loss of protection against adverse effects is of considerable concern to the Forum, including in respect of tall buildings.

KNP Policy KBR6 ('Tall buildings') specifically identifies local views as an important issue which tall buildings must deal with and therefore their explicit absence from the WCP will weaken an important local policy. This weakness could easily be addressed by WCP Policy 39 ('Townscape and Architecture') making reference in clause B to 'local views' as an important feature of local townscape. This should then be supported in the reasoned justification at paragraph 39.3 with a clear statement that the Conservation Area Audits and neighbourhood plans identify these local views. Similarly, WCP's paragraph 39.3 should identify neighbourhood plans as a further source of information on features that have been identified for their special architectural or historic interest.

It is not clear what the Council's definition of a tall building is, as opposed to a higher building or whether it will be set out in the supplementary guidance referred to. The reasoned justification talks about Westminster not being suitable for 'tall buildings' (in general) but the policy is directed at 'higher buildings' e.g. in paragraphs 40.4 and 40.6. There is no reflection of this general restriction in WCP Policy 40 and the reasoned justification cannot cure inadequacies in the policy (as it is only an aid to interpretation). The Forum considers that the general prohibition on tall buildings should be included in the WCP's policy text. The policy should also address the risk that developers might otherwise argue (e.g. through self-interest) that very tall buildings are appropriate in certain areas of Westminster to 'make the most efficient use of the site, and design, heritage and neighbourly development policies are met'. The Forum favours WCC's current definition of 'tall buildings' as 'buildings significantly taller than their surroundings'.

In other aspects, WCP Policy 40 ('Density and Building Height') is supported, given that it makes clear under what limited circumstances development that is higher than its surroundings will be supported (clause B). However, the reasoned justification at paragraph 40.4 states that 'Most of Westminster is not suitable for higher buildings' and, in respect of the Opportunity Areas, clause H.2. makes clear that proposals exceeding the permitted heights must 'demonstrate support from the local and neighbouring communities.' The Forum therefore considers it reasonable, given the clear guidance provided by WCP Policy 40 on design and neighbourly development, that the general policy 40.B should only support development for higher buildings where they demonstrate support from the local and neighbouring communities.

***Objective 2: Improve the public realm and enhance and restore heritage features***

WCP Policy 38 ('Westminster's heritage') is supported, particularly clause L regarding the recognition of non-designated heritage assets and the fact that they can be identified through neighbourhood plans. In this regard, it would be helpful if the WCP can clarify that 'non-designated heritage assets' include 'local buildings and structures of merit' as identified in KNP Policy KBR5 ('Local buildings and structures of merit').

WCP Policy 39 ('Townscape and architecture') is supported, particularly the recognition of the importance of restoring heritage features such as boundary railings and walls. The Forum considers that the 'high level' approach in WCP Policy 39 to matters such as new shopfronts is appropriate and provides the opportunity for neighbourhood plans to provide appropriate consideration of detail on relevant design matters for particular neighbourhoods, as demonstrated in KNP Policy KBR2 ('Commercial frontages, signage and lighting').

WCP Policy 41 ('Public realm') is generally supported, particularly the recognition of the importance of maximising pedestrian convenience. For example, see KNP Policies KBR7 and KBR8.

***Objective 3: Protect and enhance Hyde Park and Kensington Gardens Metropolitan Open Land including the Hyde Park Barracks land***

The WCP Policy 37 (Design Principles) is supported, particularly the focus on responding to local context, putting people at the forefront of design and the promotion of sustainable design. A key consideration for the Forum is how design policies will be applied to the potential future development of the Hyde Park Barracks. The WCP continues to allocate Hyde Park Barracks as a strategic site for the delivery of new housing, with an allocated figure for the number of new homes. The plan correctly states that the delivery of the site is subject to primary legislation, a point made in the KNP, which includes a detailed policy for the Barracks site.

It is the assumption on reading the proposed policies around WCP Policy 39 (Townscape and Architecture) and WCP Policy 40 (Density and Building Height) that should the Barracks site come forward for development, that proposals while optimising the density of the site should be sensitively designed, having regard to the prevailing scale, character, external materials, architectural quality and other relevant considerations as set out in the policy framework including the neighbourly development and other policies. This approach is supported. WCP Policy 40 states that developments higher than their surroundings will only be supported when it is demonstrated that building higher is the only way to make the most efficient use of the site (which is assumed to be meeting the housing target for the site set out in the WCP). Based on this assessment the Forum assumes that the Council's position is that the site is not a suitable location for any additional tall buildings. The Forum notes that the development would also have to respect the historic parks/gardens as it would appear in the wider setting which would have to be safeguarded.

It is considered that a planning brief or development opportunity framework should be prepared for the Barracks site (as encouraged in paragraph 3.16 of the KNP), to give greater certainty and clarity around the development parameters of the site, should primary legislation come forward to enable this, and to provide detailed interpretation of how planning policy will apply to the site.

Please tell the Forum how WCC calculated the precise strategic allocation of 128 housing units on the Hyde Park Barracks land e.g. assumptions, information from the Defence Infrastructure Organisation etc. If more convenient, please treat this as a formal Freedom of Information request.

#### ***Objective 4: Promote the sense of community***

WCP Policy 7 ('Neighbourly development') is supported as the framework for protecting residential amenity. This is a key concern to residents. The Forum is pleased that the relevant matters covered in clauses A to H are key matters raised and addressed through the development of the KNP. Please amend paragraph H to say "Manage construction impacts during the design, deconstruction and construction phases of development" since it is possible to design-out many problems that might otherwise arise later e.g. through careful consideration of access routes, encouraging the re-use of existing piling or facilitating the use of pre-fabricated components during construction. Please see KNP Policy 22 including its reasoned justification for drafting.

The Forum notes that the WCP proposes to drop the use of 'stress areas', replacing this with the neighbourly development concept in WCP Policy 7. The Forum has no objection to the removal of the specific naming of 'stress areas' provided that the underlying protections can remain. For example, the KNP dropped its designation of a precisely defined 'Neighbourhood Stress Area', after objection from the Council, when the Council proposed another approach to achieve essentially the same protections i.e. by encouraging commercial development towards a narrowly defined International Shopping Centre area (and the Strategic Cultural Area when appropriate) and ensuring the mitigation of effects within that area and fully outside it (see KNP Policies KBR14, KBR15 and KBR17).

WCP Policy 15 ('Town centres, high streets and the CAZ') is supported, including the retention of Knightsbridge as an International Centre. Equally, the recognition in paragraph 15.7 that Knightsbridge International Centre's (KIC's) retail provision should be predominantly for 'shopping', with convenience shopping creating servicing issues, is supported. However, it should provide more explicit support for the provision of new retail uses and the preservation and enhancement of existing hotels that would enhance the KIC's international reputation. It is also important that it remains narrowly and precisely defined in geographic area. For example, please see KNP Policy KBR17 and the KNP's Policies Maps.

The flexibility of the upper floors including the provision of offices and other complementary uses is supported. Careful consideration should however be given to the criteria for considering change of use applications away from A1 retail, particularly to other town centre uses, given the context of Government's proposed changes to the use class order as set out in the recent budget speech. Should non-A1 uses such as restaurants be permitted as a change of use from A1, the provision of tables and chairs on the footway, opening hours and licensing provisions should be carefully considered to fully protect neighbouring residential amenity.

WCP Policy 15, clause G3 relating to no more than three non-A1 uses consecutively needs to be more restrictive since it could still result in up to eight non-A1 uses in 10 consecutive premises in an international or town centre e.g. three – one – three – one – two. This is a significant concern in Knightsbridge where the proliferation of cafés risks turning Brompton Road into one major tourist destination (i.e. Harrods) surrounded by cafés. It will be important that uses are properly monitored and enforced as a review undertaken to inform the KNP identified a number of discrepancies between the active use and that granted by planning permission.

WCP Policy 16 ('Markets and commerce in public realm') seeks to prevent kiosks or structures from which goods will be sold being sited in the public realm. This is supported. Also supported is clause C which recognises that tables and chairs on the highway not only have the potential to obstruct pedestrian movement but also to harm local amenity and to impede refuse storage and street cleansing.

WCP Policy 18 ('Food, drink and entertainment uses') clause B protects pubs by requiring an 18-month marketing period before they can be converted to an alternative use. This clause is supported, as is clause E seeking to limit the impacts of shisha smoking on residential amenity, which is a significant issue in Knightsbridge. The new elements addressing hot food deliveries and shisha smoking are also supported to protect residential amenity.

The Forum supports WCP Policy 30 ('Community infrastructure, education and skills') and its protection for existing community uses.

The Forum supports WCP Policy 34 ('Managing local environmental effects'), particularly in respect of clause C on construction impacts, clause E on noise pollution and clauses G and H on commercial and residential waste management. It would be helpful if clauses G and H make reference to 'recycling' as well as waste disposal and storage. For example, please see KNP Policy KBR21 ('Household and commercial waste consolidation').

***Objective 5: Protect and enhance existing residential amenity and mix***

The Forum is concerned that WCP Policy 8 ('Stepping up housing delivery'), when combined with the replacement of the UDP saved policies, would not retain the restriction on the conversion of single dwelling houses to more than one unit in Knightsbridge (including single dwelling houses above basement flats) (UDP Saved Policy H5: 'Providing a range of housing sizes' including paragraph 3.79 and Map 3.2).

<https://www.westminster.gov.uk/unitary-development-plan-udp>

It is not clear what the justification would be for the change of approach in Knightsbridge. In order to avoid confusion and retain a consistent approach, the Forum would encourage the Council to reflect this different approach for Knightsbridge (and other areas as appropriate) in WCP Policy 8.

The KNP's policy KBR24 ('Reconfiguration of existing residential buildings') encourages in principle the restoration of existing residential properties to their original built form where they increase the number of residential units. This approach is entirely consistent with protecting some existing single dwelling houses.

WCP Policies 10 ('Meeting housing needs') and 12 ('Student accommodation') are supported, particularly the recognition of the importance of providing affordable student accommodation and protecting such accommodation from change of use.

***Objective 6: Foster an environment that enables our world-class cultural and educational institutions to thrive as centres of learning and innovation within a flourishing community***

The continued designation and support for the Strategic Cultural Area is supported as a key function of the Knightsbridge Area. However, the removal of the specific strategic policy around the protection and enhancement of the uses of national and international importance should be reconsidered given the status that these uses have as visitor attractions, key venues or foci of a particular activity or centres of educational excellence (such as Imperial College London) which should be preserved and enhanced as a presumption. Given the significant benefits of these uses, the policy should require their preservation and enhancement.

***Objective 7: Enable active travel and personal mobility and***

***Objective 8: Encourage superb public transport***

The Forum welcomes and supports the adoption of ‘active travel’ as an underlying principle underpinning the WCP’s movement policies, including the focus on pedestrians, cycling and public transport in WCP Policy 24 (‘Enhancing mobility’). The Forum also supports WCP Policy 25 (‘Highway access and management’) in requiring sufficient provision of space for taxis and coaches, WCP Policy 26 (‘Freight, servicing and deliveries’) in minimising impacts of servicing and deliveries and WCP Policy 27 (‘Technological innovation in transport’) in supporting the proliferation of electric vehicle charging points.

The Forum is concerned by requirements of WCP Policy 28 (‘Parking’). The maximum residential parking standards set out in Appendix 2 have requirements that do not align with the draft new London Plan, which requires the development in the CAZ (including Knightsbridge) to be car-free. The WCP should align with the requirements of the draft London Plan to avoid confusion and conflict. Moreover, at the borough level, encouraging development in such a highly accessible location within Central London to have parking spaces does not align with the WCP’s objectives of improving the environment and air quality nor does it genuinely prioritise pedestrians and cyclists over motor vehicles in accordance with WCP Policy 24. Further, clause B actively runs contrary to these policies, requiring car free development to meet particular criteria to be permissible. In any event, the policy as currently drafted lacks sufficient justification when read with the other policies in the WCP.

***Objective 9: Encourage superb utilities and communications infrastructure***

The Forum supports WCP Policy 31 (‘Digital infrastructure and information and communications technology’) and the requirement to make on-site provision for telecommunications equipment in major commercial developments. It is considered that this requirement should also be extended to major residential developments as well, as they also require significant amounts of such provision to be made.

Whilst the intention of WCP Policy 33 (‘Managing flood risk’) is supported, in general terms, the Forum is concerned that it is more about reacting to the problems caused by development than pro-actively anticipating and managing risk e.g. it should encourage the design of buildings to reduce peak and day-to-day water discharge. Worse, the Policy could restrict the best and most effective flood infrastructure from being provided and be abused by some developers to comply with minimum standards within SuDS. Clause D currently requires Sustainable Drainage Systems (SuDS) to be provided for all development. However, as noted in Policy KBR33 of the Neighbourhood Plan, there may be better solutions which can come forward (if WCP Policy 33 of the WCP didn’t restrict their adoption). For example, please see Imperial College London’s work on sustainable urban water management:

<http://www.imperial.ac.uk/environmental-and-water-resource-engineering/research/urban-water/>

Please therefore amend the policy so that the ‘highest feasible standards of SuDS or better’ should be adopted by all development.

***Objective 10: Be an exemplar in sustainable city living by complying fully with international laws, standards, guidelines and best practice***

The Forum objects to WCP Policy 32 (‘Managing air quality’) as currently drafted since it would require all major development to maintain pollution levels over the lifetime of the WCP. Worse, it does not require or encourage any improvement in local air quality.



This would mean, in practice, that as emission levels fall due to building energy efficiency, electric vehicles, increased active travel, renewable energy and other changes that any improvement would need to be offset by a dedicated ‘pollution generator’ on site to maintain pollution levels. This would not be consistent with the London Plan or the Council’s stated commitment to improve air quality. At a minimum, please insert the words ‘at least’ before ‘air quality neutral’ in Policy 32.A and ‘or better’ after ‘air quality neutral’ in Policy 32.B. The Forum assumes that WCP has made a drafting or other error and asks WCC to fix it now.

The Forum considers that the justification text for WCP Policy 32 could also be improved. For example:

- paragraph 32.1: PM<sub>2.5</sub> levels are also consistently high and the WCP should seek to reduce these harmful particles. See:

<https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/3/gid/1000043/pat/6/par/E12000007/ati/102/are/E09000002/iid/30101/age/230/sex/4>

- paragraph 32.3: ‘Air quality neutral’ should include nitrogen dioxide (NO<sub>2</sub>) as well as particulate matter given the extent of breaches of legal limits and health guidelines shown in Map 18.
- paragraph 32.3: The Forum encourages the Council to drop all references to the GLA’s SPG for ‘Sustainable Design and construction’ for benchmarking ‘air quality neutral’ since:
  - air quality should be focused on ‘concentrations’ as much or more than ‘emissions’;
  - it sets London-wide benchmarks which may not be applicable in the most polluted parts of the CAZ including the City of Westminster (Appendices 5 and 6); and
  - Appendices 7 and 8 propose standards that are not ‘technology neutral’ e.g. they would allow higher emission levels for more polluting types of appliance (diesel/biodiesel or solid biomass) rather than setting absolute emission levels that should be achieved irrespective of technology.
- paragraph 32.3: If the Council makes any reference to the GLA’s SPG for ‘Sustainable design and construction’ as a benchmark for air quality neutral it should make clear that the benchmarks for buildings and transport (as shown in Appendices 5 and 6) must be complied with.

The Forum considers that WCP Policy 36 (‘Energy’) should be more ambitious and point development more explicitly to ‘zero air emission buildings’ as soon as possible and in any event over the lifetime of the WCP. Please note that ‘zero air emissions’ is not the same as ‘air quality neutral’.

Other ways to improve WCP’s Policy 36 include:

- please allow not require connections to existing heat networks or a local Decentralised Heat Network and ensure that any such energy source would need to achieve or approach zero air emissions as soon as possible and in any event over the lifetime of the WCP; and

- make clear in references to BREEAM or equivalent performance standards that these should not incentivise small scale combined heat and power or worsen local air quality. Please see the KNP's paragraph 10.13 and Policy KBR40.D.b.

The Forum encourages WCC to be more ambitious than the Mayor and to have policies that will enable the changes that are needed urgently to mitigate and adapt to climate change and comply fully with World Health Organisation guidelines for air quality in ambient air and inside buildings.

Please therefore review and amend WCP Policies 32 and 36 after reading the KNP's policy and justification wording on KBR34 'Healthy air' and KBR35 'Renewable energy'. It is important that the WCP enables a rapid shift to zero air emissions, increases the amount of 'zero air emissions' renewable energy generated in Westminster and positively encourages it over the lifetime of the WCP. Please note that KNP's Policy KBR33 'Utilities and communications infrastructure' helps to facilitate this vision.

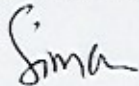
WCP Policy 35 ('Green infrastructure') is supported although the Forum considers that it could go further in actively encouraging the greening of buildings to improve the environment, health and quality of life e.g. green roofs and walls should do more to enhance biodiversity and mitigate the urban heat island effect. For example, please see KNP Policies KBR9, KRB10 and KBR37.

The reference in clause C of WCP Policy 38 ('Westminster's heritage') to the sensitive upgrading of historic buildings to improve their environmental performance is supported.

Last but not least, please make clear in the WCP the role of neighbourhood planning and its opportunity to go further than strategic policies in the WCP (provided that it remains in 'general conformity' with its strategic policies).

My colleagues and I would be pleased to discuss further these representations with you and your officers.

Yours sincerely



Simon Birkett  
Chair  
Knightsbridge Neighbourhood Forum