

Knowledge note – Version 1.0 on 6 June 2019

# Our journey to the first 'made' neighbourhood plan in the City of Westminster

The purpose of this 'Knowledge Note' is to explain the process that the Knightsbridge Neighbourhood Forum (KNF) followed to achieve the first 'made' neighbourhood plan in the City of Westminster. We hope that by doing so we will encourage other Forums in Westminster and elsewhere to progress their plans to a successful conclusion. The process took us three to four years with a number of 'ups' and 'downs' along the way. We're pleased we did it! Please see the 'Timeline' in the Appendix for details and any guidance on process published by Westminster City Council (WCC).

# Designation twice and governance (six to nine months or more)

The Knightsbridge Neighbourhood Area (KNA) was designated as a "neighbourhood area" which was not a "business area" pursuant to section 61G(1) and 61H of the Town and Country Planning Act 1990 by WCC on 27 March 2014. The KNF applied to be designated as a "neighbourhood forum" pursuant to Regulation 9 of The Neighbourhood Planning (General) Regulations 2012 in March 2015 and was designated pursuant to section 61G(2)(b) of the Town and Country Planning Act 1990 by WCC on 21 July 2015 with an exclusive mandate for five years to produce a neighbourhood plan. In order to ensure a solid foundation, we created a company limited by guarantee with a quorum for board meetings requiring two resident directors, one business director and one cultural director. This approach ensured that business and institutional stakeholders, who would not be able to vote in the Referendum, would be represented and involved at the heart of our planning.

Our task and options were simplified by: WCC not allowing cross-border forums (as others have achieved after great efforts) and designating the KNA as a neighbourhood area which is not a business area; not 'allocating' sites; and having direct and full alignment with one strong amenity society and group of three councillors. We also had: a highly motivated and experienced group of people involved who know the local community and issues; adequate funding; outstanding (not the most expensive) advisers; and an opportunity/urgent need to shape the future of the Hyde Park Barracks, if it is developed. A key motivation was to share these advantages by writing policies and documenting the process so that others in Westminster and beyond could benefit from or build upon our work – provided that they tailor it fully to the specific opportunities and challenges in their local area.

The KNF appointed professional advisers in 2015 including Field Seymour Parkes as solicitors, Westbury as accountants, HSBC as bankers, Ixxy to build a website and Chris Bowden of Navigus Planning as planning consultant. Kate Harrison of Harrison Grant Solicitors was appointed in 2017 to provide legal advice on the progress of the neighbourhood planning. A core team of three directors held mainly weekly conference calls throughout the process.

#### Foundations (six to 12 months or more before Pre-Submission (Regulation 14) consultation)

Following designation, we activated the legal entity and held our first KNF board meeting in September 2015. We then applied for government grants from Locality and set up our website: <a href="mailto:knightsbridgeforum.org">knightsbridgeforum.org</a>.

We recognised that we needed to identify the key issues and objectives for our neighbourhood plan well before starting work on drafting it.

The 'skeleton' of our neighbourhood plan was created and tested in two main stages. These were two public events where large A1 size display boards were used to test our initial research and priorities. Each event: took several weeks to organise and publicise; needed signage, sign-in sheets, a large room or space with chairs and at least one table (say 10 metres by 10 metres); and required three or four forum directors or advisers in attendance to answer questions. We encouraged people to say whether they agreed with our priorities or wished to add others. This phase was helped by being able to see Mayfair Neighbourhood Forum's early work, published online.

Our 'Top 75' priorities, more or less, comprised:

**Vision** Make Knightsbridge the best residential and cultural place in London in which to live,

work, study and visit.

Values Community, conserving, clean safe and quiet, iconic, inspiration and international.

Themes Character, community, culture and education, public spaces and utilities and healthy

environment and healthy people

**Objectives** We identified 10 objectives under the five themes.

**Outcomes** 50 initial policy priorities were eventually whittled down to 40 planning policies.

We also tested 10 priorities for neighbourhood management and about eight each for principles and specific projects for Community Infrastructure Levy or other spending.

Broadly speaking, we pursued issues or priorities that carried 90% or greater support at each consultation stage. Some needed clarification before achieving it. After nearly a year's local consultation, we fixed the skeleton or shape of our neighbourhood plan and did not change it subsequently.

This process is described in our Consultation Statement which was one of eight documents submitted. It is most simply described by 'The Funnel'.

#### The Funnel

# Vision, values, objectives and priorities

- 1. Local stakeholder organisations consulted (December 2015)
- 2. Two public exhibitions
- 3. First draft plan

#### More policies. More ambitious policy wording e.g. 'must' or 'shall'

- 4. Pre-submission (Regulation 14) consultation (December 2016)
- Second draft plan
- 6. NPIERS Health Check Report (or similar)
- 7. Statutory screening consultations and supporting documents
- 8. Submission (Regulation 16) consultation (December 2017)
- 9. Examination
- 10. Referendum (October 2018)

Fewer, better worded policies. More evidence, Robust reasoned justification. Less restrictive policy wording e.g. 'encourage'

Having developed the 'skeleton', we re-read carefully, the government's guidance on neighbourhood planning which was immensely valuable. Do not waste time working on a plan without reading and re-

reading it: <a href="https://www.gov.uk/guidance/neighbourhood-planning--2">https://www.gov.uk/guidance/neighbourhood-planning--2</a>. It is also important to read WCC's City Plan policies carefully and understand which policies are 'strategic' and which already address a local issue satisfactorily. The new City Plan should specify which policies and their components are 'strategic' to help forums understand what they need to be in 'general conformity' with. All policies in the London Plan are considered 'strategic'. If an issue has sufficient policy coverage in the City Plan or London Plan there is no need to produce a neighbourhood plan policy that duplicates it.

Having tested our proposals thoroughly and read the official guidance, we spent two months producing the first draft of our plan (July and August 2016). We shared this '250 page' draft with stakeholder organisations and arranged a preliminary health check through NPIERS with Christopher Lockhart-Mummery QC (CLM). We agreed with WCC that they would provide initial comments on our plan within six weeks of receiving it. We opted for the maximum '20 year' plan, not finding a strong reason for a shorter timescale, and should have allowed for the length of the approval process i.e. 2038 not 2037. Other forums may wish to align their neighbour plan's time period with that of the City Plan.

We found the preliminary health check valuable because we had no precedents to follow but it took a few weeks to complete. It may not be necessary for other forums if they consult WCC, obtain good neighbourhood planning advice and follow official guidance.

Our preliminary health check resulted in the first of two serious setbacks and delays. We received strong advice from WCC and CLM that we should split our document into three separate documents:

Knightsbridge Neighbourhood Plan (KNP)

Knightsbridge Evidence Base Document (KEBD) Knightsbridge Management Plan (KMP) 'Land use' policies that would be subject to Examination and Referendum and would form part of the statutory development plan which must be considered in determining an application for planning permission.

Document supporting KNP and referenced. Community priorities that were not deemed land use and could not be included in the KNP but reflected the additional steps that the KNF and local residents wanted to pursue to improve the KNA outside the planning process.

WCC sent comments in a long letter attaching a '20 page' table with strategic and specific comments on every part of our plan. These comments seemed a little daunting at first read! Others may wish to 'test' more ambitiously than we did the definition and scope of 'land use' policies and what can lawfully be included in neighbourhood plan policies and/or elsewhere in the neighbourhood plan e.g. transport policies. We would caution other forums however since pursing non-land use policies (i.e. policies that cannot be determined by planning applications) could add unnecessary complexity or time to the process only for such matters to be recommended for removal by WCC and/or an independent examiner.

Most of WCC's advice was good though it must be recognised that they (and we) were both finding our way with no precedents to follow. In retrospect, it would be most helpful to have had comments from WCC that were split between: red lines ('must have' strategic or big picture points such as the 'need' to allow new housing on the Hyde Park Barracks site); yellow ('important' such as a request to include references to relevant City Plan or London Plan policies alongside KNP policy wording); or green ('nice to have' such as the ordering of policy wording before reasoned justification). Other improvements might include constructive recommendations for addressing gaps or problems in the plan (which might be done at a meeting). WCC asked the KNF to include maps but omit most pictures from the KNP.

We accepted most of the advice from WCC and CLM quickly but took great care to use consistent formatting and numbering between the three documents to make them as easy to read and clear to follow as possible. In retrospect, we were wise to follow the above approach and create a plan on firm foundations with a flexible and robust structure or shape that we were able to stick with right through to referendum. For example, it helped to have consistent headings organised around our 10 objectives and numbered paragraphs.

We had conflicting advice about whether we were allowed to include an 'Executive Summary' at the start of our KNP but decided to include it and found it valuable at all subsequent stages.

It is worth bearing in mind that all your correspondence to and from WCC may appear in court as seems to have happened during the judicial review of the St Quintin & Woodlands Neighbourhood Plan. We found it extremely valuable to get professional advice and WCC's input before the Pre-submission consultation because it kept us within 'The Funnel' and may have avoided the need to repeat stages.

# Pre-submission (Regulation 14) consultation – 8 December 2016 to 15 February 2017

This consultation was a valuable opportunity to test the forum's detailed KNP and supporting documents. It is a statutory public consultation for a minimum six weeks, subject to strict rules, and must include consulting a number of statutory consultees e.g. Environment Agency, Historic England, Natural England and WCC. There is excellent government guidance on the requirements.

We continued to follow the Funnel approach by including policies and stronger wording (e.g. 'shall', 'must' or 'require' in policy wording) in the first KNP and KMP to encourage clear feedback while maintaining the option to remove or weaken it later. In general, it is relatively easier to remove policies or weaken wording up to the Regulation 16 consultation and possible thereafter but likely to be difficult to strengthen wording or add a wholly new Policy because it could raise questions about the consultation process, or worse, result in statutory consultees legitimately changing their opinion or conclusion about your plan. Our main obligation is to be in 'general conformity' with strategic policies in the statutory development plan (which for the KNA meant being in general conformity with WCC's City Plan and the London Plan). Unlike the City Plan, there are less onerous 'soundness' or 'evidence' requirements but we provided lots of evidence. In principle, the more ambitious, more restrictive the policy wording, the more evidence will be required including testing of the policy's 'viability'. This is important.

The Government's National Planning and Policy Framework requires plan makers to consider 'viability' and 'deliverability'. In practice, this means that the sites and scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The issues are more complicated if a plan 'allocates' one or more sites.

These documents were posted on our website, emailed widely and highlighted at local meetings and events. We encouraged responses and received about 50 – split equally between residents and organisations. The process and results are described in our Consultation Statement.

# 'Screening' the report including environmental effects with statutory consultees – February to October 2017 (six to 12 months or more after Regulation 14 consultation)

We analysed all the responses to our pre-submission consultation and revised our plan into near final shape. This process is likely to take at least two to three months with several more months needed to allow for holiday periods and subsequent statutory consultations.

We then consulted WCC again (six weeks) and arranged a formal health check with NPIERS (one to two months). This was the second and final time that WCC was willing to comment on our plan outside the two formal consultation stages. We asked NPIERS for someone with experience of legal, design,

environmental, policy and viability matters and were fortunate to get CLM again. His advice allowed us to fine tune our plan and drop one or two policies (because we felt they added little) and present our transport policies more logically. We found the NPIERS process efficient and valuable.

At this stage we felt reasonably confident that plan was largely complete and met the legal requirements. In particular, we felt that each of our policies had a clear 'end point' in mind and 'allowed' developers to get there now (e.g. zero air emissions/electric buildings) and 'encouraged' them to do so over the '20 year' life of the plan. We also decided to align every one of our policies with one or more of the United Nations Sustainable Development Goals in Agenda 2030. By nudging development along this path, we felt we were not imposing unviable or undeliverable requirements and were pointing to true sustainability in our area by 2037.

Our second serious setback arose because WCC and we seemed to be going around in ever <u>decreasing</u> and <u>increasing</u> circles, for nearly nine months, about the need for the KNF to undertake a Strategic Environmental Assessment, Habitats Regulations Assessment and/or Sustainability Appraisal for the KNP. This was exacerbated by the lack of established local precedent. WCC expected the KNF, not the council, to produce such documents in support of the KNP.

In the end the Forum appointed Kate Harrison, of Harrison Grant Solicitors, to advise us on these matters. Kate quickly cut through the issues and the Forum produced:

- i. Strategic Environmental Assessment screening report
- ii. Habitats Regulation Assessment screening report
- iii. Sustainability Report i.e. not a Sustainability Appraisal

We found that no policy, individually or cumulatively, would have significant positive or negative effects on the environment after amending one or two policies. We decided that a 'Sustainability Report' was a proportionate means to assess the KNP without undertaking the separate further consultation, with statutory consultees, that a formal 'Sustainability Appraisal' would require. This was a good decision for us.

We were required to consult the Environment Agency, Historic England, Natural England and WCC on (i) and (iii) and Natural England and WCC on (i) and (ii) for a statutory five weeks. This was another valuable part of the process. Highlights included: the Environment Agency pointing out that the KNA includes a groundwater source protection zone; Historic England pointing out that we had wrongly (and needlessly) weakened our 'Tall buildings' policy by allowing up to 'significant adverse' impacts; and Natural England pointing us to 'Greenspace information for Greater London' (GiGL) who produced an amazingly detailed report about the local natural environment.

By this time, the KNP and supporting documents were firming up. We needed to produce two other documents for submission which were: (i) a 'Basic Conditions Statement' to demonstrate that the KNP met the legal requirements for making a neighbourhood plan; and (ii) a Consultation Statement to explain the consultation undertaken and to summarise how the consultation responses have been taken into account. WCC confirmed 'no objection' to a draft 'Basic Conditions Statement'.

At this stage, as the KNF prepared to submit its plan, the Forum accepted that it would lose the unilateral right to change the KNP or supporting documents. Subsequent changes could only be made with the agreement of WCC, the Examiner or both (and possibly others if further consultation is required). It was important therefore to feel comfortable with the plan, confident that it met the legal requirements and to understand that the Examiner may <u>not</u> allow the forum to propose or make <u>any</u> further changes to the submitted plan. We may have over-engineered the plan and provided more supporting material than strictly required, though it is unclear in which areas, but we were keen not to miss anything and

had no precedents to follow. We were fortunate to have Harrison Grant 'legalising' key parts of the KNP to ensure, as best as we could, that it met the strict legal requirements including 'Basic Conditions'.

Again, we followed the Funnel approach and included two policies and other proposals that WCC did not seem willing to accept: 'View north along Montpelier Street' and 'Sustainable development and involving people', four appendices (Knightsbridge construction standards and procedures, Tree Management Plans, Knightsbridge Community Engagement Protocol and Scales of development) and stronger wording in several policies. This was a carefully judged but good decision for us.

## Submission/Examination (Regulation 16) consultation: 20 December 2017 – 14 February 2018

We submitted our package of documents to WCC on 22 November 2017. They became responsible then for the cost and organisation of the Submission (Regulation 16) consultation. This was posted on their website and ours immediately thereafter and ran from 20 December 2017 to 14 February 2018 (which allowed extra time for holidays).

WCC consulted on all eight submitted documents. These were:

- 1. Knightsbridge Neighbourhood Plan
- 2. Knightsbridge Evidence Base Document
- 3. Knightsbridge Management Plan
- 4. Basic Conditions Statement
- 5. Consultation Statement
- 6. HRA Screening Report
- 7. SEA Screening Report
- 8. Sustainability Report

Our Basic Conditions Statement included an 'area statement' confirming the designation of the KNA.

In addition to WCC consulting those we had consulted at Regulation 14 stage, including statutory consultees, the Forum encouraged a wide range of responses. As well as posting the documents on our website, we leafleted every local household and business, spoke at events and emailed the consultation information to others.

WCC received nearly 100 responses (99) with about half from residents and half from organisations. About 90% of these were supportive including many business organisations supporting our approach on 'Healthy air' and 'Renewable energy'.

It is important to recognise that the neighbourhood plan begins to take significantly greater and increasing weight in planning decisions in the neighbourhood area at the end of this stage. In essence, the weight of a draft policy will be dependent on the stage of consultation and whether there are significant objections to the policy i.e. until the outcome of the examination is known.

#### **Examination (four to six months or more)**

WCC and the KNF were required to agree on the choice of Examiner. The KNF insisted on someone with experience of neighbourhood planning and London. We were lucky to get Ms Jill Kingaby BSc (Econ) MSc MRTPI, of Intelligent Plans and Examinations (IPE) Ltd, who was fair to us (and WCC) and highly professional. Correspondence was published online to ensure transparency. The Examiner decided that the KNP was a standalone document, subject to Examination, with the Knightsbridge Evidence Base Document and Knightsbridge Management Plan as supporting, evidential documents.

The KNF asked the Examiner whether it could respond to the 99 consultation responses which was allowed. We tabulated our responses to each comment and proposed small changes to the KNP to address them.

WCC asked then to comment on our responses. The Examiner approved this approach and invited the Forum and WCC to agree a 'Statement of Common Ground' (which had not been done before by WCC). The Forum and WCC embraced this approach which turned out to be highly productive.

Over several weeks, WCC proposed highly constructive feedback to the KNP such as changing the 'Neighbourhood Stress Area' policy to deliver similar policy outcomes within the already defined 'International Shopping Centre'. In some ways it would have been nice if that happened earlier but it is understandable that 'final agreement' takes place at the very end when all the work has been done and evidence in available. The KNF recommends that both sides recognise the Funnel approach, with its strengths and weaknesses, including some inbuilt (constructive) conflict between a forum and WCC.

The KNF was willing to lose a 'hand' and/or 'leg' of the KNP at this stage to keep the project on track. We did that because we recognised that the Examiner could, inter alia, conclude that the KNP did not meet the 'basic conditions' and/or might rule in WCC's favour on important points. By agreeing changes with WCC, within the legal requirements of neighbourhood planning, the Forum and WCC were able to minimise the uncertainty inevitable by leaving important, perhaps vital issues, to the Examiner to 'adjudicate' upon.

Key items which we accepted included: dropping one policy; agreeing to move four appendices to 'Best practice guidance' published on the Forum's website provided that each was addressed directly in the KNP and correcting or weakening some policy wording e.g. to make the policy less onerous or less prescriptive. WCC also made concessions.

This approach was so successful that the Forum and WCC 'agreed' everything other than six 'second order' matters in the SOCG. These were matters which were either small points of principle (e.g. what were saved policies), important differences of opinion or approach (e.g. the Forum wanted the Tall buildings policy to be 'half full' whereas WCC wanted it to be 'half empty') or on technical matters (e.g. the interpretation of air quality law).

This work meant that the issues were highly focused for the Examiner. The Examiner, of course, has to judge everything but we were pleased that Ms Kingaby largely approved wording agreed between the KNF and WCC. Please remember that the Examiner has wide powers to accept or reject proposals.

Throughout, we knew that the Examiner's final report could recommend that the KNP: proceed to referendum unchanged; proceed with specified changes; or cannot proceed to referendum e.g. because it does not meet the Basic Conditions. The Examiner also proposes the area for the referendum.

The Examiner sent WCC and the Forum a final draft of her report for fact checking. We were warned properly that other comments would not be accepted. The final report was dated 10 July 2018.

WCC was required by law to accept or reject the recommendations in the Examiner's report within five weeks. It accepted the report on 21 August 2018 and decided subsequently on the referendum date. Regrettably, there is no fixed timescale for the referendum in statute or national guidance. However, WCC acted expeditiously and agreed an early date with the KNF and found an excellent venue for the Polling Station.

#### **Referendum (two to four months or more)**

This was an exciting moment. We had spent two years establishing a network of area, street and building champions. We had split the KNA into North, South, East and West with leaders in each and identified one or more people responsible for each street, square or residential block throughout the KNA.

Our plan took a year longer than we had hoped to reach referendum (i.e. more than three years instead of two) but the referendum build-up would take up to 12 months at least to build the network and brief people. We began with quarterly, in the first year, then monthly and finally weekly and twice-weekly meetings with the Area Champions. Paragraph 157 on page 93 of the High Court judgment involving St Quintin & Woodlands Neighbourhood Forum acknowledged 'democratic' lobbying or campaigning.

This process worked very well. WCC's electoral services team was magnificent. They helped us to understand the detailed timetable and processes. This includes two important dates not published by WCC. These were the posting dates for poll cards and postal votes which mattered because we wanted to reach people with postcards or leaflets just before they received important information. Forums are allowed to see the full register which is helpful because we were able to tell porters that '50 people' in their building were registered to vote. WCC took a very narrow view of voting by proxy which we did not challenge.

A number of strict legal restrictions applied during the formal 'referendum period'. For example, a 'referendum expenses' limit was calculated and set by WCC at £2,470.38 based on the number of persons entitled to vote in the Referendum. We had to submit an 'expenses return'.

The KNF achieved overwhelming support (93.0%) from those voting on a good turnout of 19.21% for neighbourhood planning in London. This result was 'declared' by WCC on the night of the Referendum. We think there was relatively low turnout from students at Imperial College London and soldiers at the Hyde Park Barracks despite our efforts to engage them.

## Making the Plan (two months)

The Plan comes into force and becomes part of the statutory development plan for the area as soon as it passes referendum by virtue of section 38 (3A) of the Planning and Compulsory Purchase Act 2004. This is important because the plan switches from being one of what could be many material considerations in the determination of planning applications, to being the starting point for determinations. As a result, the subsequent formal 'making' of the Plan is simply 'confirmatory' since it is already deemed part of the development plan. WCC must 'make' (i.e. adopt as part of the statutory development plan) the Plan within a statutory 'eight week' period following the neighbourhood plan passing the referendum (unless there is a breach of Human Rights or European Union law). The Neighbourhood Portion of the CIL rises from 15% to 25% (uncapped) when the Plan is 'made'.

In theory, three decisions by WCC could be judicially reviewed within six weeks of the relevant decision i.e. the decision to accept (or reject) the Examiner's recommendations; the decision to hold a Referendum; or the decision to make the Plan.

#### Some benefits of neighbourhood planning

The progress of the KNP had been an important focus of community engagement. The making of the KNP crystallised the main benefits of the neighbourhood planning progress and meant that the community had produced a plan that would contribute to the long term success and sustainability of the KNA. It also triggered the higher prospective percentage of the 'neighbourhood portion' of Community Infrastructure Levy monies (i.e. an increase from 15% capped to 25% uncapped). As time had gone

by, we had also understood better the considerable powers, responsibilities and opportunities given to the neighbourhood forum by the Localism Act, other legislation and national guidance. Perhaps, most important, we felt that we had been able to express our vision and plans to improve the KNA.

# Bringing the plan to life (thereafter)

The KNF is keen to bring the KNP to life and expects to focus on the following priorities:

- 1. Pursuing at least once all 85 of the Knightsbridge Management Plan actions listed;
- 2. Commenting selectively on significant planning applications or consultations relating to the Area e.g. proposals to develop Hyde Park Barracks. Speak to WCC officers;
- 3. Commenting on emerging planning policies that could affect the area;
- 4. Seeking to ensure that CIL and other planning obligation monies are utilised fully in line with the neighbourhood plan;
- 5. Monitoring the application of the policies to ensure they have been applied consistently and interpreted correctly in response to planning applications;
- 6. Report annually or biannually on outcomes e.g. early 2020;
- 7. Reviewing the policies and updating the Plan from time to time e.g. minor or more substantial changes; and
- 8. Applying to Westminster City Council to review its designation in July 2020.

WCC has published guidance on the process for spending the neighbourhood portion of CIL monies.

The KNF can be contacted via its website which also contains details of our work knightsbridgeforum.org.

Legal disclaimer: This Knowledge Note is based on the Knightsbridge Neighbourhood Forum's recollection of events and is published without accepting any responsibility or liability to any other organisation or person.

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#### Appendix: Timeline for Knightsbridge Neighbourhood Plan (KNP)

2014

27 March Knightsbridge Neighbourhood Area designated as a residential area by WCC (after

eight week representation period (27 November 2013 to 22 January 2014)

2015

21 July Knightsbridge Neighbourhood Forum designated by WCC (after six week

representation period closing on 15 May 2015)

**Autumn** Consultations with local stakeholder organisations to identify key issues and priorities

2016

January Initial website launched

26-27 February First <u>public exhibition</u> with display boards

6 July Second <u>public exhibition</u> with display boards (to firm up 'Top 75 priorities') **July-August.**Autumn

Second <u>public exhibition</u> with display boards (to firm up 'Top 75 priorities')

Vision, values, objectives and priorities finalised and first draft of KNP prepared

Informal consultation on first draft KNP with local stakeholder organisations and WCC

and preliminary health check from Christopher Lockhart-Mummery QC (via NPIERS)

8 December Pre-submission (Regulation 14) consultation launched by KNF (six weeks minimum)

2017

15 February Regulation 14 consultation closes

27 April Revised draft KNP sent for NPIERS Health Check and to WCC for detailed comments

23 May Health Check Report from Christopher Lockhart-Mummery QC (via NPIERS)

7 July Comments from WCC on revised draft KNP

22 August Final draft KNP circulated to local stakeholder organisations

**August-** Statutory consultations on Strategic Environmental Assessment Screening report and Habitats Regulations Assessment Screening report (assumes no 'significant' positive

or negative impacts on relevant criteria) (five weeks minimum)

October Informal consultation on Basic Conditions Statement with WCC 22 November KNP submitted to WCC with seven supporting documents

20 December Submission (Regulation 16) consultation launched by WCC (six weeks minimum)

2018

14 February Submission (Regulation 16) consultation closes

28 February Ms Jill Kingaby BSc (Econ) MSc MRTPI (of IPe) appointed as <u>Examiner by WCC</u>
11 May Statement of Common Ground sent to Examiner with agreed/other changes to KNP

10 July <u>Examiner's report</u> and <u>Appendix</u> published on KNP and area for referendum 21 August Council decided to accept all the Examiner's recommended modifications\*

August-

**September.** Forum allowed to view full electoral register subject to strict restrictions 10 September Information Statement for Referendum published by Westminster

13 September Notice of Referendum and poll cards posted to voters. NB date not published by WCC

5 October Postal votes posted to voters. NB date <u>not</u> published by WCC

18 October Referendum of residents on electoral roll in the Knightsbridge Neighbourhood Area\*

11 December KNP 'made' (i.e. adopted) by Westminster\*

<sup>\*</sup>Judicial review may be possible at these stages