KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

Knightsbridge Neighbourhood Plan 2017-2036




Part Three: Knightsbridge Evidence Base

Pre-Submission Consultation
(Regulation 14) Version
8th December 2016

CONTENTS

INTRODUCTION

i.1 The Knightsbridge Evidence Base (KEB), comprising Part Three of the strategic plan for Knightsbridge, sets out the evidence that underpins the policies contained in Part One: Neighbourhood Plan. The Neighbourhood Plan is referred to as 'the Plan' while the area it covers is referred to as 'the Area'.

i.2 The KEB mirrors the sections of Part One to enable easy read-across between each policy and the evidence underpinning it. Hence, as with Part One, each theme has its own chapter, subdivided into the objectives, sub-objectives and finally the policies themselves.

i.3 Chapter Two provides an introduction to Knightsbridge which paints a picture of what the Area is like at the moment and sets out some of the issues that have arisen through the consultation process.

i.4 Chapters Three to Seven then set out the evidence against each theme.

i.5 Evidence has been compiled from a number of sources:

- Extensive engagement with the local stakeholders including through workshops, face-to-face meetings, 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.

i.6 The Plan must be in general conformity with the planning documents sitting above it in the planning hierarchy. For Knightsbridge, that is the National Planning Policy Framework, the London Plan, and the Westminster City Plan and saved policies from Westminster City Council's (WCC's) Unitary Development Plan.

i.7 It is recommended that the policies in Part One are read in conjunction with the Evidence Base in Part Three in order to understand fully the context for each policy and to help explain what each policy is trying to achieve.

How the Plan has been prepared

i.8 The purpose of the Plan is to guide development within the designated Area and provide guidance to any interested parties wishing to submit planning applications for development within it. The process of producing a Plan has sought to involve the community as widely as possible and the different topic areas reflect matters that are of considerable importance to Knightsbridge, its residents, workers, students and cultural and community groups. It has therefore given the community the opportunity to guide development within their neighbourhood.

i.9 KNF has led the preparation of the Plan by establishing the concept of four broad 'quarters' – residential, cultural, Hyde Park and business – and engaging with key groups, organisations and individuals who are well-established representatives from each quarter and more generally.

Neighbourhood Plan Exhibition

i.10 The development of the Plan has been undertaken in three distinct steps:

- The initial identification of a vision, values and issues through engagement workshops with various stakeholders.
- The testing and exploration of the vision, values and issues with the wider community through a two-day public exhibition. This was also made available for comment online through KNF's website (www.knightsbridgeforum.org), with further promotion through Facebook and Twitter.
- The development of 'Top 75 actions and policies', which were tested with the wider community through a one-day public exhibition. This information was again made available online along with a survey to gain feedback. A bespoke version of the survey was made available for workers and students at the cultural and educational institutions.

Policy Feedback Exhibition

THE LOCAL CONTEXT

'Knightsbridge - representing the best of everything'

ii.1 Knightsbridge is one of the most iconic names and places in the world. To its visitors, it is famed for world class shops, cultural venues and hotels. Yet to its residents it is home, the place where they live and carry out their daily lives. To the students at Imperial College, the Royal College of Music, the Royal College of Art and other educational institutions it is also the place where they live and study and develop their careers. And to people working in the area, it is where they spend their days, including times outside of work hours where they can enjoy all that Knightsbridge has to offer. It is many different things to many people.

Living in Knightsbridge

ii.2 For the residents of Knightsbridge it is important that the benefits of living in a busy, bustling Central London neighbourhood are balanced against the need for tranquillity in a pleasant environment. In the many residential streets that make up the majority of the Area[1], the streets are quiet and leafy, defined by the many private squares such as Montpelier Square and Trevor Square. The quality of this environment is reflected by the large number of listed buildings across the area and the fact that most of the Area has conservation area status.

Living in Knightsbridge: attractive mews housing and rubbish on streets that require repair

ii.3 However, maintaining the high quality environment defined by these squares and the heritage of the buildings, needs constant work and monitoring. Over time it is inevitable

[1] For the purposes of the Plan, the residential streets are formally referred to as 'Local Roads'. The rationale is provided in paragraph 7.2 and the extent of the Local Roads is shown in Figure 11.

that certain properties will be in need of work to bring them back up to the standard of the buildings around them.

ii.4 This highlights one of the issues for Knightsbridge's residents which needs to be addressed in order to achieve the vision – in places Knightsbridge would benefit from being tidied up so that the whole of the Area is at its best. This in turn places the spotlight on the issue of absentee ownership of properties. Approximately one-third of Knightsbridge properties are listed as having no usual residents. It has become more and more common for properties, when sold, to be bought by overseas investors that not only do not rent the properties out to people working in London, but do not rent them out at all – the 'buy to leave' phenomenon. This results in fewer residents living in the area and a consequent loss of community.

ii.5 Many residential properties are being significantly renovated. This creates considerable disturbance from construction traffic which, with regular renovations occurring throughout the residential streets, becomes a constant and ongoing issue.

ii.6 Knightsbridge's residences are not just confined to the quiet roads in the centre of the Area. Many people live in the large residential blocks along Brompton Road, Knightsbridge and Kensington Road as well as in the area which is also home to the cultural and education institutions in the west of the Area, around Exhibition Road.

ii.7 To continue to be the best of all things, Knightsbridge must continue to be a safe area. There are a number of major roads bounding the Area which create issues for pedestrians. Collisions between vehicles, cyclists and pedestrians are most common where Brompton Road meets the Local Roads (as defined in Figure 11) and near dedicated pedestrian crossing facilities.

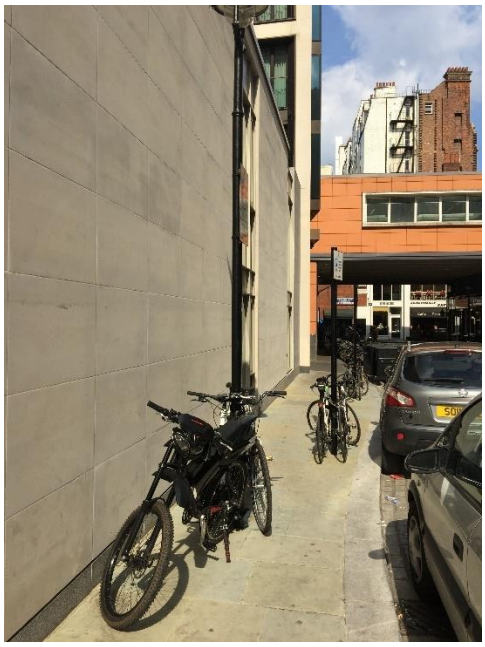
Working in Knightsbridge

ii.8 The business base of the Area is relatively small following the loss of Bowater House and other offices along Knightsbridge and Brompton Road. This is acknowledged in the Westminster City Plan in respect of Knightsbridge's wider role in the Central Activities Zone. However, there are some significant employers in the Area, including J Walter Thompson and Brompton Asset Management. The largest employers are hotels and the cultural and educational institutions, including Imperial College. The retailers along Brompton Road also employ significant numbers of people, particularly the large multi-national retailers.

ii.9 Most of the workers in the Area do not live in the Area, so for them, travel into and through Knightsbridge is particularly important. The busy transport interchanges at Knightsbridge and South Kensington Underground stations would benefit from improvements to their layout and access - Transport for London has plans to improve both, which are supported, in principle, in these respects. Increasing numbers of workers are choosing to cycle to

work and so want more, dedicated and secure, bike parking facilities. Users of the London cycle hire scheme would also like more bike docking stations to enable easy pick up and drop off of bikes.

Working in Knightsbridge: Lack of bike parking and the popular cycle hire scheme



ii.10 At lunchtime and in the evenings, workers want a choice of places to buy lunch and dinner and go for a drink. In some parts of the Area there is a shortage or absence of quality food and drink establishments e.g. wine bars and restaurants.

Shopping and leisure in Knightsbridge

ii.11 Knightsbridge is one of two International Shopping Centres in London. It is an iconic location famed for its high end shopping. Destinations such as Harrods and Harvey Nichols attract lots of tourists, creating high volumes of pedestrian movement along the main routes adjacent to the Area. Meanwhile, particularly along Brompton Road and the Knightsbridge Green area, the pavements have become increasingly lined with tables and chairs as more units are given over to cafés and sandwich bars. In 2016, 50% of the units were occupied by these types of businesses with a significant number of other units providing a food and restaurant-type offer, despite being classified as shops. This reduces the space for people to walk and highlights the need for more enforcement.

ii.12 The proliferation of cafés and sandwich bars along Brompton Road has served to reduce the number of shops. Many local people feel that Knightsbridge's International Shopping Centre status is being eroded by the loss of retailers and the wider issues that the cafés and sandwich bars, which replace them, bring in terms of litter and tables and chairs

restricting pavement space. From the point of view of residents, these detract from the Knightsbridge shopping experience.

Shopping in Knightsbridge: Limited pavement space and one of the few convenience stores

ii.13 On a more practical scale elsewhere in the Area, the lack of convenience retail stores is an issue for residents and students in particular. For example, there could be more places to buy simple, everyday items such as a pint of milk and a newspaper.

ii.14 Knightsbridge's international status attracts tourists as well as shoppers to Knightsbridge. The increasing popularity of the area as a tourist destination is partly a result of the changing character of some of its commercial properties. In particular its cafes and restaurants are popular evening and night time venues, with several having late licences. This fits with the emergence of London as a '24-hour' city; however, the proliferation of such uses has also resulted in parts of Knightsbridge becoming 'neighbourhood stress areas'. Residents still need a good night's sleep (the same as anyone else) and so the activity of cafés and restaurants during late hours needs to be limited and, where already in operation, needs to be better managed.

ii.15 Hyde Park is an important leisure destination for all those in Knightsbridge. Access to the Park is an issue, requiring the crossing of a major traffic route along Kensington Gore, Kensington Road and Knightsbridge.

The cultural and education institutions in Knightsbridge

ii.16 The western part of the Area incorporating much of the space and activity around Exhibition Road is home to a number of significant cultural and educational institutions including Imperial College, the Royal Albert Hall, Royal College of Art and the Royal College of Music. Together with the major museums of South Kensington (which fall outside the boundary of this Neighbourhood Area) this part of London has a unique and very special history as the world's first planned cultural quarter. The institutions founded from the legacy of the Great Exhibition of 1851 for the benefit of all are each world-

renowned centres of excellence and play an extremely important part in London's status as a leading world city. These institutions are part of the larger Strategic Cultural Area, as defined under London Plan Policy 4.5 (London's Visitor Infrastructure) and its corresponding Map 4.2, which also takes in the Science and Natural History Museums. Within the Area, Imperial College, the Royal Albert Hall, Royal College of Art and the Royal College of Music are some of the institutions that form part of the 'Albertopolis' cluster and help to define the activity there.

Cultural and educational life in Knightsbridge: Imperial College and impassable Exhibition Road

ii.17 These diverse, dynamic and world-renowned activities which include training, outreach, research, teaching, performance, promotion, expertise, design and creation, writing, publishing, entertainment and exhibition underpin the special qualities of the Strategic Cultural Area. In an increasingly competitive environment, continued development, evolution, investment and innovation within each of the organisations is essential if the area is to maintain its world-leading position and be identified as the home of science, art and inspiration. These institutions are competing in an international arena and there is much development activity that has happened and will continue to happen in the future in order for them to remain competitive. It is vital that this is appropriately facilitated so that they may flourish but it must also be recognised that the area is home to a significant residential community whose amenity needs to be respected. The immediate environment of the institutions is along Exhibition Road, Kensington Road, Prince Consort Road and Queen's Gate. The Exhibition Road shared space elicits many different responses. Many people consider it an excellent public space which serves the needs of tourists, students and residents alike. Others think that the design and layout does not serve the shared space concept well and it results in an environment that is dangerous for both pedestrians and cyclists.

ii.18 There is evidence that average vehicle speeds along the section of Exhibition Road in the Area are well in excess of the 20mph limit. Also, the roundabout at the junction with Prince Consort Road is particularly dangerous. There are many traffic problems associated

with Exhibition Road including: rat running along Prince Consort Road and Princes Gardens; U-turns in Exhibition Road by people wanting to turn right from Knightsbridge into West Carriage Drive; different speed limits; mixtures of one and two lane traffic; poor signage and enforcement; persistently high traffic volumes; and confusion about safe space for pedestrians.

ii.19 In its current form, the changes to Exhibition Road represent a good first step but improvements can be made.

The environment in Knightsbridge

ii.20 The Knightsbridge Area is bounded by some major traffic arteries in Brompton Road and Knightsbridge. Brompton Road in particular suffers from significant congestion for most of the day. This contributes to Knightsbridge being one of many parts of London experiencing significant air pollution. In fact, Brompton Road breached its annual legal limit for hourly nitrogen dioxide (NO_2) for the whole of 2016 by 8 January[2]. This is a major global and London-wide issue that is concentrated in the Area, which is a matter of great concern to local residents, businesses and others.

ii.21 The wider physical environment of Knightsbridge is of a high quality. Its green spaces in particular are part of what defines the Area. Hyde Park and Kensington Gardens are designated as Metropolitan Open Land (MOL), so enjoy the same protection as Green Belt[3], reflecting its importance as an open space for leisure activity, the benefit it provides to the wider environment and the impact this has on the adjacent built up area, particularly along Knightsbridge and Kensington Road. The relationship in particular between Hyde Park and the Hyde Park Barracks, in terms of the activity of the Household Cavalry, is an important one.

ii.22 The Area's seven squares, Queen's Lawn within Imperial College and Knightsbridge Green provide a green feel to the residential area – this is not a high rise, high density urban environment of concrete. Its trees are an important part of this, with Knightsbridge being home to the London Plane tree, one of the historic characteristics of the capital. With global warming putting more pressure on the species and habitats in the local environment, it must be ensured that greater resilience is built in to the trees and green spaces of Knightsbridge. For example, there are very real concerns about the over-dependence on the London Plane tree in the capital due to evidence elsewhere of it succumbing to disease on a large scale. In Montpelier Square, one of the plane trees had a tree branch removed in 2015 when the massaria disease was found during a routine inspection. All the Square's other planes trees were promptly inspected and received the all clear. 'Plane wilt' is an even bigger threat to London Plane trees.

[2] https://www.theguardian.com/environment/2016/jan/08/london-takes-just-one-week-to-breach-annual-air-pollution-limits

[3] See London Plan Policy 7.17

ii.23 The need for more efficient, low energy technology and activity in the future is paramount in all locations. Knightsbridge is a place which can lead on this and there is enthusiasm to lead by example through the use of electric vehicles and restrictions on polluting vehicles and energy sources.

ii.24 Knightsbridge is exemplary in many things and it wishes to be the same in its environmental achievements.

KNIGHTSBRIDGE'S CHARACTER

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

Sub-objective 1.1 Ensure that all buildings apply the highest quality design and materials

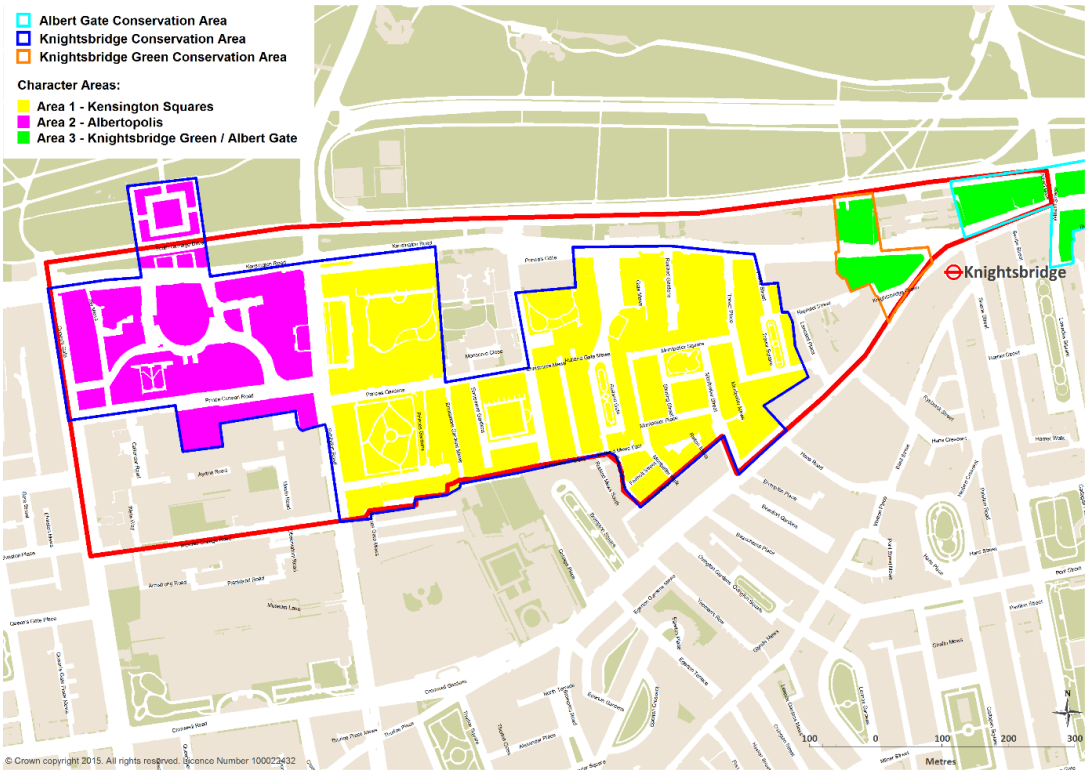
POLICY KBR1: CHARACTER, DESIGN AND MATERIALS

1.1. This policy aims to protect the recognisable character of Knightsbridge when planning for new development or redevelopment. It conforms to Policy 7.4 (Local Character) and Policy 7.6 (Architecture) of the London Plan; and 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 Area.

1.2. The character of the Area is articulated in the Conservation Area Audit (CAA) for Knightsbridge, Knightsbridge Green and Albert Gate[4] and summarised in Figure 1.1.

[4] City of Westminster (2009) *Conservation Area Audit and Management Proposals: Knightsbridge; Knightsbridge Green: Albert Gate*

Figure 1.1: Knightsbridge Conservation Areas and Character Areas



1.3. 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 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 seven garden squares, Queen's Lawn and Knightsbridge Green 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 Garden Mews

Garden squares: Montpelier Square and Ennismore Gardens

1.4. 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. Buildings in this area are mainly in red brick or terracotta, on large plots and of a large scale. This does not include the full extent of the Strategic Cultural Quarter or the area created from the legacy of the Great Exhibition of 1851 affectionately known as 'Albertopolis'. The 1851 legacy area extends to the south of Prince Consort Road and includes the buildings of institutions such as Imperial College, some of which have a very different character.

Imperial College

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

1.5. 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

1.6. Of great importance to the character of all three areas is their setting with Hyde Park/Kensington Gardens to the north. The park provides a backdrop to each area, forming a green northern edge to each area.

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

1.7. One of the issues raised by stakeholders was the growing range of commercial premises across the Area, particularly cafés and take-aways. Knightsbridge is designated by Westminster City Council (WCC) as an International Shopping Centre[5] which means that it has an 'international reputation' and 'attracts global visitors'[6]. Retailers located in the International Shopping Centre should therefore contribute towards this status. However, there has been an increasing trend of retailers that fail to deliver this being permitted to locate along Brompton Road and in other areas. In particular Knightsbridge has seen an increasing loss of retail premises to café and take-away uses. This has affected the quality of the retail offer by creating a shopping 'monoculture' and consequently is undermining Knightsbridge's role as an International Shopping Centre.

1.8. This policy seeks to ensure that design aspects relating to commercial properties are in-keeping with the character of the Area. It confirms to London Plan Policy 7.4 (Local character) and Westminster UDP Saved Policies DES5 (Alterations and extensions) and DES8 (signs and advertisements).

[5] The London Plan refers to this area as an 'International Retail Centre'

[6] Westminster City Plan glossary

Examples of shop fronts not in-keeping

1.9. Westminster UDP Saved Policy DES5 (Alterations and extensions) provides general policy guidance for new shopfronts and Saved Policy DES8 (Signs and advertisements) the same for on signage and lighting. In addition, WCC's Supplementary Planning Guidance 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 retailing 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 ultra-low energy lamps (as opposed to fluorescent or strip lighting)
- 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

1.10. The engagement process revealed that generally, preservation and enhancement of the 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 help to make it more attractive to others. Some felt that all new developments must be in keeping with the historic features or heritage of the area.

1.11. This policy seeks to safeguard existing railings and walls 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 Westminster UDP Saved Policy DES7 (Townscape management).

POLICY KBR4: HERITAGE FEATURES

1.12. This policy seeks to ensure 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 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.

1.13. The general quality of pavements and streets 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, lighting and street furniture (e.g. scratched paintwork). In particular Raphael Street and Knightsbridge Green were identified as being very neglected.

1.14. For paving, thick York stone[7] should be used around the squares in the Area and elsewhere, with thick natural quality materials which are ideally UK-sourced in order to reduce transport emissions from delivery. These should also be laid alongside small granite setts. Granite setts or kerbs should be used wherever possible along roads. For roadways, cobbles should be used in the mews and tarmacadam in other streets. For avoidance of doubt, the mews roads are:

- Ennismore Mews
- Ennismore Garden Mews

[7] The thickness should be approximately 10cm to withstand the weight of HGV lorries

- Gate Mews (part)
- Jay Mews (part)
- Montpelier Mews (part)
- Princes Gate Mews (part)
- Relton Mews

1.15. In addition, heritage railings and street lamps in the Conservation Areas should be replaced where they are missing or in a poor state of repair. Any such replacement should ensure that the design of the replacement item is in keeping with the character of the local area. Lighting should use the latest technology to minimise energy use and future proof them. Residents have expressed a preference for the square-shaped street lamp fittings.

Example of a square-shaped street lamp

Sub-objective 1.4 Protect important views and properties

POLICY KBR5: LOCAL VIEWS

1.16. This policy seeks to protect the locally important view north along Montpelier Street. It adds a detailed local dimension to Westminster UDP Saved Policy DES15 (Metropolitan and local views).

1.17. The policy also conforms to London Plan Policy 7.7 (Location and design of tall and large buildings).

Important local view north along Montpelier Street

1.18. The view is a classic example of Knightsbridge's high quality streetscape and the backdrop of the Peninsular Tower at Hyde Park Barracks helps to illustrate the detrimental impact that buildings much taller than the others in the surrounding area can have.

1.19. Montpelier Street itself is a long, open street and in this respect it captures the longest views. It is notable for the variety of different character buildings that culminate with the grand residential properties around Montpelier Square and the trees in the Square itself. In this respect, it captures the high quality residential 'essence' of Knightsbridge better than anywhere. Towards the Brompton Road end it has a number of important buildings such as Bonhams and Montpeliano.

POLICY KBR6: LOCAL BUILDINGS AND STRUCTURES OF MERIT

1.20. Certain buildings, considered to be important locally but which are unlisted local buildings or structures of merit, are in need of safeguarding. This policy seems to do just that and conforms to London Plan Policy 7.8 (Heritage assets and archaeology); Westminster City Plan Policies S11 (Royal Parks), S25 (Heritage); and Westminster UDP Saved Policy DES9 (Conservation Areas). 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 below:

Hyde Park Barracks

1.21. The third and present Barracks complex, designed by architect Basil Spence, was built in 1967-70. The Barracks are located within the Royal Parks Conservation Area. This Conservation Area has not been subject to a Conservation Area Appraisal so has not been specifically identified as an unlisted building of merit. Historic England, however, considers it to be a heritage asset of architectural and historic interest for its architectural interest, rarity in the military context, historic association and group value. The Forum understands that the Hyde Park Barracks is the last significant operational military base in central London.

4 Montpelier Street, formerly the Montpelier Mineral Water Works

1.22. The markings on the front of the building provide an historic record of its former role in the area.

122 Brompton Road, formerly the Soldiers and Sailors Help Society

1.23. Like the Montpelier Water Mineral Works, the building has markings that commemorate the former role of the building.

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

1.24. Historically the area between Hyde Park and Knightsbridge had been split into two great estates with a wall separating them. The wall was demolished by a bomb during World War II, which whilst a loss, meant that residents could eliminate the long detour when walking to Knightsbridge. 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. A small sign was put next to the wall in 1998. Today it is well used as an access route by local people.

1 Knightsbridge Green

1.25. As the last dedicated, large-scale office block remaining in Knightsbridge, 1 Knightsbridge Green is an important link to the Area's historic role as a centre of office-based commerce. However, it is the sculpture that sites atop the ground floor retail units which gives it its unique heritage interest. 'Triga' by Franta Belski was erected in the 1960s and recalls the racehorses that were bought and sold on this site while it was occupied by Tattersalls for almost 75 years.

Heritage telephone and post boxes

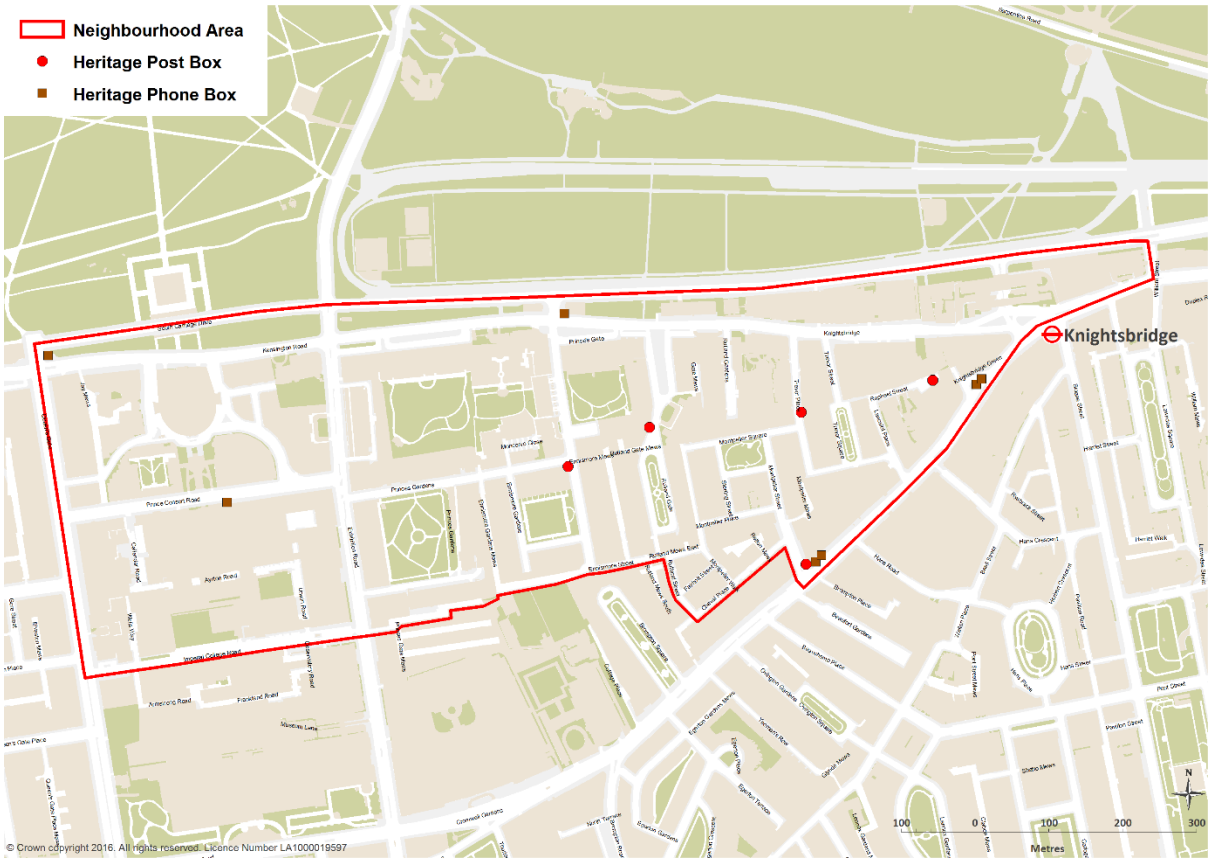
Heritage telephone box

Heritage post box

1.26. Along with the unlisted buildings of merit there are some unlisted structures of merit. These consist of heritage telephone boxes and heritage post boxes. They are located as follows (and shown on Figure 1.2):

Heritage telephone boxes	Heritage post boxes
Queen's Gate, South Carriage Drive	130 Brompton Road
East Lodge, South Carriage Drive	1 Ennismore Gardens
Royal College of Music, Price Consort Road	24 Rutland Gate
Knightsbridge Green	10 Trevor Place
Knightsbridge Green	5 Raphael Street
126 - 128 Brompton Road	
126 - 128 Brompton Road	

Figure 1.2: Location of heritage telephone boxes and post boxes



Sub-objective 1.5 Resist tall buildings inconsistent with local scale

POLICY KBR7: TALL BUILDINGS

1.27. The engagement process revealed that people did not want to see an increase in the height, bulk or footprint of buildings within the area, and particularly next to Hyde Park. This policy seeks to provide further guidance on the development of tall buildings in the Area. It conforms to London Plan Policy 7.7 (Location and design of tall and large buildings); Westminster City Plan Policy S26 (Views); and Westminster UDP Saved Policy DES3 (High buildings).

1.28. The Westminster City 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.'

1.29. Throughout the engagement, One Hyde Park was noted by many stakeholders as having a detrimental impact on local character.

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

1.30. The most obvious reason why this is so is that, wherever one stands around the junction of Scotch House Corner or down Brompton Road, it is visually overpowering. Its impact is exacerbated by the fact that the building extends out close to the original boundary of the site. KNF understands that this was in response to the developers being requested to reduce the height of the building at the planning stage. 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 Green Belt (MOL). Attention is drawn in this regard to London Plan Policy 7.17 on MOL which requires development to not have this type of adverse impact. Now that the building is in place, it is considered that the openness of the MOL has been adversely affected. One Hyde Park represents 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.

View across Knightsbridge, showing relatively low level of building heights

1.31. 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 Garden Mews

- In the west, buildings are typically taller, ranging from six to ten storeys e.g. Eresby House, Rutland Gate, and Princes Gate, 59-63 Exhibition Road. This includes the mansion blocks e.g. Albert Hall Mansions.

Princes Gate residences

Albert Hall Mansions

1.32. Conservation Area status has assisted in maintaining building heights – and the associated views - 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 One Hyde Park, 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.

1.33. 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 disbenefits of this 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 Knightsbridge Area and beyond (as addressed in Policy KBR5) and to all heritage assets, including local buildings of merit (addressed in Policy KBR7).

OBJECTIVE 2.0 IMPROVE THE PUBLIC REALM AND ENHANCE AND RESTORE HERITAGE FEATURES

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

POLICY KBR8: PEDESTRIAN MOVEMENT ALONG, ACROSS AND ADJACENT TO BROMPTON ROAD

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, across and adjacent to Brompton Road. It conforms to London Plan Policy 6.10 (Walking); and Westminster UDP Saved Policies TRANS3 (Pedestrians) and TACE11 (Tables and chairs on the footway).

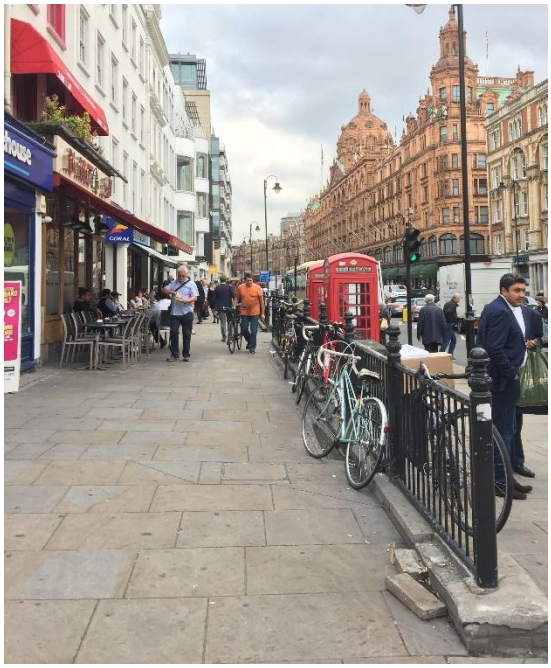
2.2 Business owners in particular said, during the engagement phase, that they would like to see public realm improvements e.g. those creating more space for pedestrians. They also said that all streetscapes should be kept clean, accessible and visually well presented. Furthermore there should be sufficient pedestrian crossings and appropriate levels of street lighting and CCTV.

Difficulties crossing Brompton Road

2.3 Existing policy does not prevent the provision of tables and chairs on pavements. However, an audit undertaken 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.

Tables and chairs create a hazard with bikes, Brompton Road



2.4 Solutions to this are difficult as there is only a finite amount of space. However, KNF would support consideration of measures to increase pavement space along Brompton Road. This would focus on certain hotspots with a narrowing of the roadway and extension of the pavement southwards along the elevated pavement eastward from Montpelier Street. Also important would be a raising of the roadway to meet the pavement level at the junction of Brompton Road with Lancelot Place (similar to the junction with Montpelier Street). This would enhance sustainable movement by increasing walking activity and could help to reduce overall levels of vehicle movement and the associated pollution that accompanies the current congestion. It would be important to ensure that any increase in pavement space was not occupied by additional tables and chairs from café or take-away premises. It is noted that Brompton Road forms part of the Transport for London Road Network (TLRN) of main roads and it is therefore important that movement along it, particular by buses, is reliable. Therefore the support of Transport for London would be crucial in securing any such change.

Congestion on Brompton Road and trees at Lower Rutland Gate gardens

2.5 The potential to narrow the roadway in order to create more pavement space should also extend to the Local Roads in the vicinity of Brompton Road where this can improve pedestrian movement for residents. However, these works should not create short cuts for large numbers of shoppers, tourists or others such as people attending events in Hyde Park or Kensington Gardens.

2.6 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. 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. The benefits of giving greater priority to pedestrians whilst not adversely impacting on the operational requirements of the cultural, education and research institutions 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 to move. These are strongly supported.

2.7 Particular recommendations for improvements to traffic management are:

- Prioritising 20mph speed limit on Montpelier Street, Prince Consort Road and Princes Gardens;
- 20mph speed limit on all Local Roads by 2018;
- 20mph speed limit on all boundary roads in the Area by 2020; and

- Prohibiting vehicles to perform a U-turn at the top of Exhibition Road in order to enter Hyde Park.

Sub-objective 2.2 Substantially improve the street appearance

POLICY KBR9: STREET FURNITURE

2.8 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 street lamps. This policy seeks to make improvements to the public realm, particularly where it is of poor quality and detrimental to the character of the Area. It conforms to London Plan Policies 7.4 (Local character) and 7.5 (Public realm); and Westminster UDP Saved Policy DES7 (Townscape management) which sets out the expected standards of design.

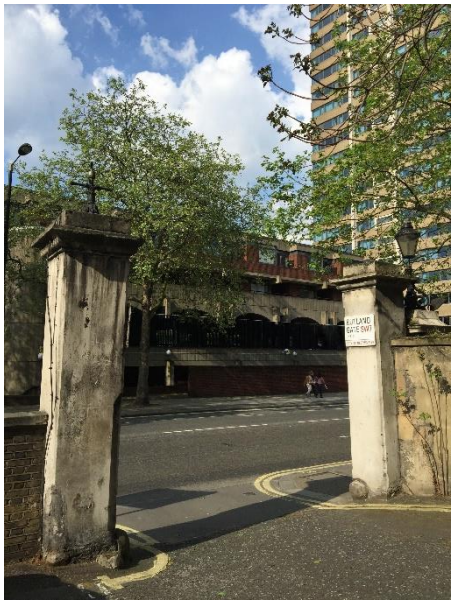
Examples of street clutter

Poorly maintained heritage wall in RBKC in Ennismore Gardens Mews

York stone in need of repair in Montpelier Square

Poor use of public realm: Knightsbridge Green and Raphael Street

Examples of missing street lamps and poor quality electrical cabinets



2.9 Development provides the opportunity to explore whether electrical cabinets can be included within buildings or placed underground. This would take away street clutter that is often unsightly. 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 and properly maintained and removed when redundant.

2.10 In addition, there are a number of modern phone boxes present 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.

2.11 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)

2.12 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.

Modern phone boxes outside 4A Montpelier Street and Montrose Court

2.13 As cited earlier in Policy KBR4, there is a need to replace or repair paved areas that are in a poor state of repair. Over time, many pavements that were paved with York stone have been replaced with cheaper alternatives and Policy KBR4 seeks the use, where possible, of York stone in the squares around Local Green Spaces. Whilst this may not be possible elsewhere, there is a need to use harder-wearing materials that are capable of withstanding heavy lorries that mount the kerbs accidentally or otherwise and are often the main cause of these problems.

2.14 Related to this is the need to 'deep clean' regularly a number of pavements which are in a poor state and mean that pedestrians may step on chewing gum or other waste. In particular there is a need to clean the streets in the Neighbourhood Stress Area (defined on the Proposals Map) e.g. using the Community Infrastructure Levy as set out in Part Two: Neighbourhood Management Plan.

POLICY KBR10: ADVERTISING

2.15 Some buildings within the KNA have been obscured, at least on a temporary basis, by very large advertising signs. These signs can be as large as 8,000ft^2 and spoil the enjoyment of the very features that have afforded them heritage status in the first place. Whilst the placement of advertising within the Conservation Areas and outside heritage buildings is considered acceptable in principle, the use of large-scale banner advertising which obscures those buildings and has a detrimental impact on the Conservation Area, is not considered acceptable and is resisted.

Telephone boxes with excessive advertising

2.16 The same principle applies to advertising in telephone boxes which, whilst afforded 'deemed consent' under planning law, can have this consent removed by the local planning authority if considered appropriate. Any such action by Westminster City Council will be strongly supported.

2.17 The design and consideration of advertising should follow the guidance in the Westminster Advertising Design Guidelines Supplementary Planning Guidance document.

2.18 This policy conforms to paragraph 67 of the NPPF.

Sub-objective 2.3 Improve roofscapes

POLICY KBR11: ROOFSCAPES AND BALCONIES

2.19 This policy seeks to ensure that development of additional roof storeys is not out of keeping with the prevailing roofline. It conforms to Westminster UDP Saved Policy DES6 (Roof level alterations and extensions) adding a more local dimension for Knightsbridge.

2.20 Concerns were raised in the engagement process about the detrimental impact an increase in height would have on the physical character of the Conservation Area and also the impact on the amenity of neighbours through overshadowing/loss of light and loss of privacy. With the generally low level of buildings across the Area, the proliferation of mechanical plant and equipment, including aerials, on roofs can also be visually intrusive.

2.21 It will be important that planning permissions have 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 Linstead Hall, Princes 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.

2.22 The same principle should apply to balconies as well as roofs. In the Linstead Hall example, a restriction was applied which prevents the placement of canopies, fences, loggias, trellises and satellite or radio antennae on balconies.

Sub-objective 2.4 Facilitate urban greening

POLICY KBR12: URBAN GREENING

2.23 The engagement process revealed strong support for sustainable development solutions particularly providing pockets of green space with specific encouragement of green spaces and concepts in new developments e.g. green walls, green roofs, trees, grass areas and flower baskets or troughs. This policy seeks to encourage the incorporation of planting within new developments.

2.24 The policy conforms to London Plan Policies 5.10 (Urban greening) and 5.11 (Green roofs and development site environs); and Westminster UDP Saved Policy ENV4 (Planting around and on buildings).

Example of a green roof and a green wall

2.25 For Knightsbridge to be the best, it wishes to take forward the 'urban forest' approach, such as in Melbourne, Australia[8].

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*

Sub-objective 2.5 Protect and enhance local green spaces

POLICY KBR13: PROTECTION AND MAINTENANCE OF LOCAL GREEN SPACES

2.26 This policy seeks to designate nine areas, identified by the local community as important, as Local Green Spaces. This conforms to Para 77 of the National Planning Policy

[8] http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0003/132249/Urban-Forest-Strategy-Adopted-Feb-2013.pdf

Framework; and London Plan Policy 7.18 (Protecting Open Space and addressing deficiency).

2.27 The areas to be protected comprise seven garden squares, Queen's Lawn and Knightsbridge Green, and are vital to the community of Knightsbridge. All are in close proximity to the community of Knightsbridge and none are significant tracts of land (the largest, Prince's Gate Garden, is 1.7 hectares).

2.28 All of the local green spaces are demonstrably special to the community and the visitors, students and workers of Knightsbridge. The private residential squares (Montpelier Square, Ennismore Gardens, Trevor Square, Upper Rutland Gate gardens and Lower Rutland Gate gardens) are an important area of tranquillity for their residents, providing recreational and amenity space. Aesthetically they are also of value to other people passing through the residential areas and they are valued by the community for the wider role they play in providing a green 'break' from development as well as the associated biodiversity benefits. More generally they provide an important townscape setting for the surrounding residential squares.

Montpelier Square

Ennismore Gardens

Trevor Square

Lower Rutland Gate gardens

2.29 Prince's Gardens and Queen's Lawn are private squares that allow public access subject to certain restrictions and, because of their size, provide a space to undertake a range of leisure activities. This enables their enjoyment by all and they are well used.

Prince's Gate Garden

Prince's Gardens

Upper Rutland Gate gardens

Queen's Lawn, Imperial College

2.30 Knightsbridge Green, whilst a very small green space, provides the only public green area at street level along the eastern end of Brompton Road leading up to Scotch House Corner. As such, it provides an important break in the built form which predominates in this location. It is enjoyed by many people, often used as a place to sit and take a break whilst passing along a main urban thoroughfare without having to go out of one's way to access a more formal green space such as Hyde Park or Kensington Gardens.

Knightsbridge Green

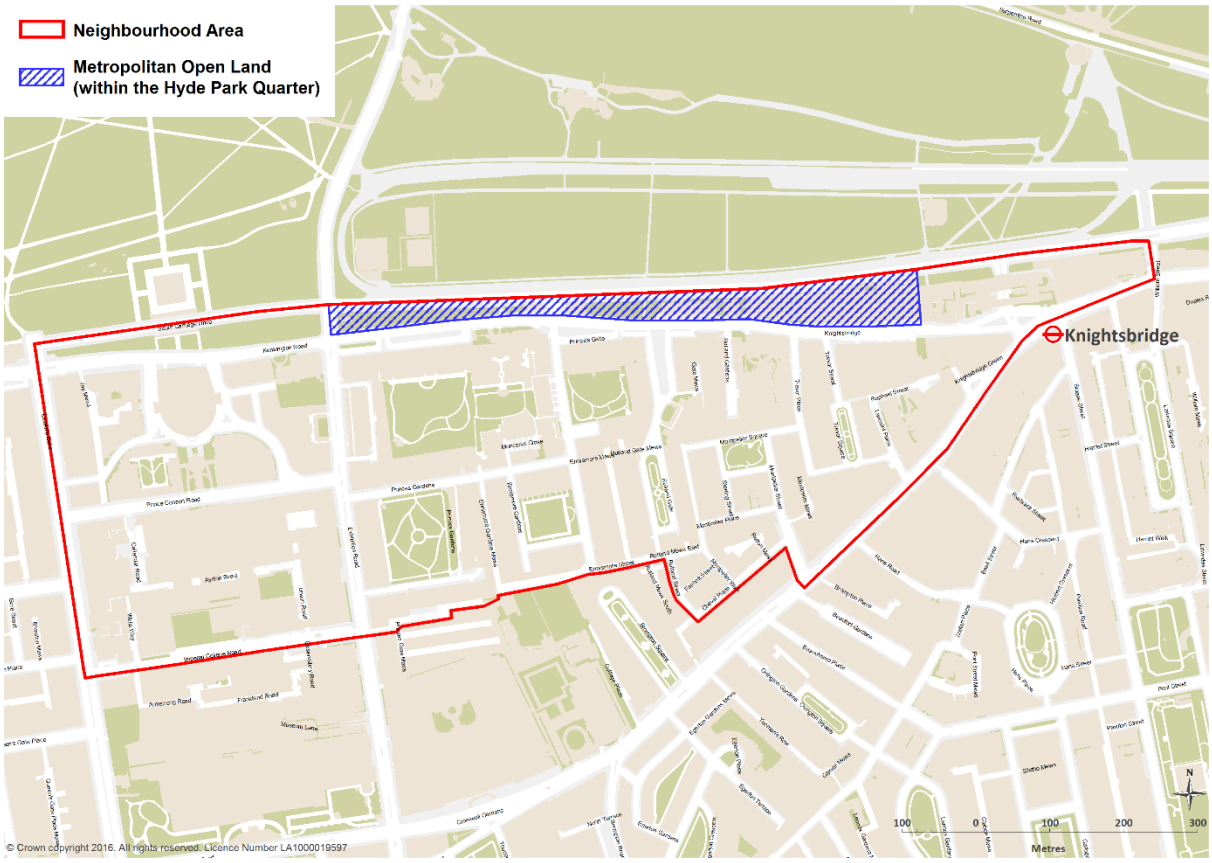
2.31 The area between 26 and 31 Prince's Gate (referred to as Prince's Gate garden) is special to the community because its trees and greenery create a soft barrier between the built environment of Prince's Gate and Hyde Park. They also create an aesthetic balance to the trees on the north side of Kensington Road.

26-31 Prince's Gate

OBJECTIVE 3.0 PROTECT AND ENHANCE HYDE PARK AND KENSINGTON GARDENS METROPOLITAN OPEN LAND (MOL) INCLUDING THE HYDE PARK BARRACKS LAND

3.1 The boundaries of Metropolitan Open Land (MOL) in the Knightsbridge Neighbourhood Area are shown in Figure 3.1. 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 3.1: The Neighbourhood Area's MOL



Heritage of the Neighbourhood Area's MOL

3.2 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.

3.3 This evolution over time has brought a rich heritage. It is important that this heritage is properly protected.

3.4 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
- 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.

3.5 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.

3.6 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 KNF's Board understands that it cannot be sold without primary legislation.

POLICY KBR14: LOCAL CHARACTER OF THE NEIGHBOURHOOD AREA'S MOL

3.7 This policy seeks to safeguard the character of the Area's MOL. It confirms to London Plan Policies 6.10 (Walking), 7.4 (Local character) and 7.5 (Public realm); Westminster City Plan Policies S11 (Royal Parks) and S35 (Open space); and Westminster UDP Saved Policy DES1 (Principles of urban design and conservation).

3.8 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'[9]. 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.

3.9 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[10].

[9] http://www.knightsbridgeforum.org/media/documents/knf_evidence_report_for_the_mol_110416.pdf
[10] See NPPF para 123

Protecting tranquillity across the Neighbourhood Area's MOL therefore represents a significant consideration for the Neighbourhood Plan.

POLICY KBR15: METROPOLITAN OPEN LAND

3.10 This MOL within the Area enjoys the same protection as Green Belt[11]. 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[12]. The policy conforms to London Plan Policy 7.17 (Metropolitan Open Land); Westminster City Plan Policy S11 (Royal Parks); and Westminster UDP Saved Policy ENV14 (Metropolitan Open Land).

3.11 The purpose of the Neighbourhood Area's MOL designation is its fulfilling of the designation criteria set out in the London Plan[13]. Different areas of land within the MOL satisfy different designation criteria set out in the London Plan[14].

3.12 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

3.13 The Hyde Park Barracks was created from parkland in 1793.

3.14 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.

3.15 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[15] 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[16]. Policy KR6

[11] See London Plan Policy 7.17

[12] 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).

[13] See London Plan Policy 7.17

[14] See London Plan Policy 7.17

[15] https://historicengland.org.uk/advice/hpg/hpr-definitions/#h

[16] Historic England's conclusion when recommending HPB was listed

considers Hyde Park Barracks an important but unlisted local building or structure of merit that requires special protections.

Site allocation

3.16 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.'

3.17 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.

Legal restriction

3.18 The land occupied by the Barracks has special status under law and the KNF understands that it cannot be sold without primary legislation.

3.19 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'.

3.20 The KNF 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 KNF Board also understands that it would require primary legislation to change this position.

Availability of Hyde Park Barracks for development

3.21 The implication of the 1879 legislation is that realistically the Hyde Park Barracks land is not presently available for the development identified in the Westminster City Plan.

3.22 Moreover, it is established that any plan to sell the Barracks relies upon a suitable alternative facility (understood to be within 4km of Horse Guards Parade or a 35 minute ride at walking pace) being found for the Household Cavalry Mounted Regiment. As yet, no information exists in the public domain to indicate progress made in identifying an alternative site, with the attendant need to secure both ownership of the relevant land and a planning permission authorising such a use also therefore to be resolved in the future. As of this date the land is therefore not available for this reason.

3.23 An alternative option would be to retain a barracks use on the same land and provide new housing alongside it. However, there is no guarantee that it would be feasible for a development to deliver over 100 homes (the minimum requirement of a strategic site by the City Plan) in that configuration, given the limited extent of Site 34 (which does not include the Peninsular Tower). Westminster City Council has not, to the KNF's knowledge, carried out an exercise demonstrating the potential capacity of this land for new housing.

KBR16: PROPOSED DEVELOPMENT AT THE HYDE PARK BARRACKS LAND

3.24 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 Westminster UDP Saved Policy ENV14 (Metropolitan Open Land).

3.25 There were strong feelings locally about the Hyde Park Barracks land with the majority of people feeling that either the site should either remain as it is or be returned to its original Metropolitan Open Land status. Failing that, then the height, bulk and footprint of any redevelopment should not be increased or out of keeping with the surrounding buildings. It was felt by some that the Peninsular Tower should be removed when possible (and not replaced).

3.26 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.

KNIGHTBRIDGE'S COMMUNITY

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 KBR17: NEIGHBOURHOOD STRESS AREA

4.1 The Westminster City Plan identifies certain 'Stress Areas'. These are places where 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 This policy seeks to minimise impact from development within these Local Stress Areas 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); Westminster City Plan Policy S24 (Entertainment uses); and 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).

4.3 WCC's Local Stress Areas currently include the West End, part of Edgware Road and part of Queensway and Bayswater. KNF considers that, based on the feedback from the community and evidence that the increase in cafés, take-aways, restaurants and other entertainment uses and their associated activity means that part of the Knightsbridge Area fulfils the requirement of being a Stress Area.

4.4 Evidence of Stress within the Area and immediately adjacent to it in RBKC includes: 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; a proliferation of beggars, buskers and thieves attracted to the crowds during the day and evening; chronic and acute traffic congestion at most hours of the day or night; public transport overloaded (e.g. with Knightsbridge underground station frequently closed due to overcrowding); air pollution far exceeding legal limits and guidelines; many road traffic collisions involving serious injury or death; filthy pavements, litter and rubbish dumping;

and noise and anti-social behaviour in the evening and late at night. 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 area.

4.5 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 start operating much longer hours, particularly on weekends. This would be opposed by KNF.

4.6 The Plan therefore proposes a similar policy framework to that in the WCC City Plan for this part of the Area which it defines as a 'Neighbourhood Stress Area'. In recognition of this, KNF considers that WCC should undertake the same approach as it does to the borough-designated Stress Areas in terms of ensuring that impacts of entertainment uses – both the individual and cumulative - are properly mitigated and managed. This includes ensuring that entertainment premises ensure they have effective dispersal plans which take into account the dispersal plans of other premises, observe the licence restrictions placed on them in respect of noise limits and they generally do not increase levels of anti-social behaviour in the local area. To do this WCC must use the full weight of its powers and resources and substantially increase its enforcement operations. This should include a commitment to regular testing/monitoring of noise levels in the Neighbourhood Stress Area, e.g. three-monthly.

4.7 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.

4.8 WCC UDP Saved Policies TACE8, TACE9 and TACE10 provide a clear framework for uses within the Central Activities Zone (CAZ), which includes the Area. In order to complement this and ensure that the particular issues of relevance to the eastern end of the Area as a Neighbourhood Stress Area are addressed if additional entertainment uses are proposed, Policy KBR17 seeks to ensure that proposals have clear protocols in place to ensure that users of the premises are dispersed effectively (i.e. avoiding loitering) and that other issues such as litter and noise are dealt with.

POLICY KBR18: NIGHT-TIME AND EARLY MORNING USES IN OR ADJACENT TO RESIDENTIAL AREAS

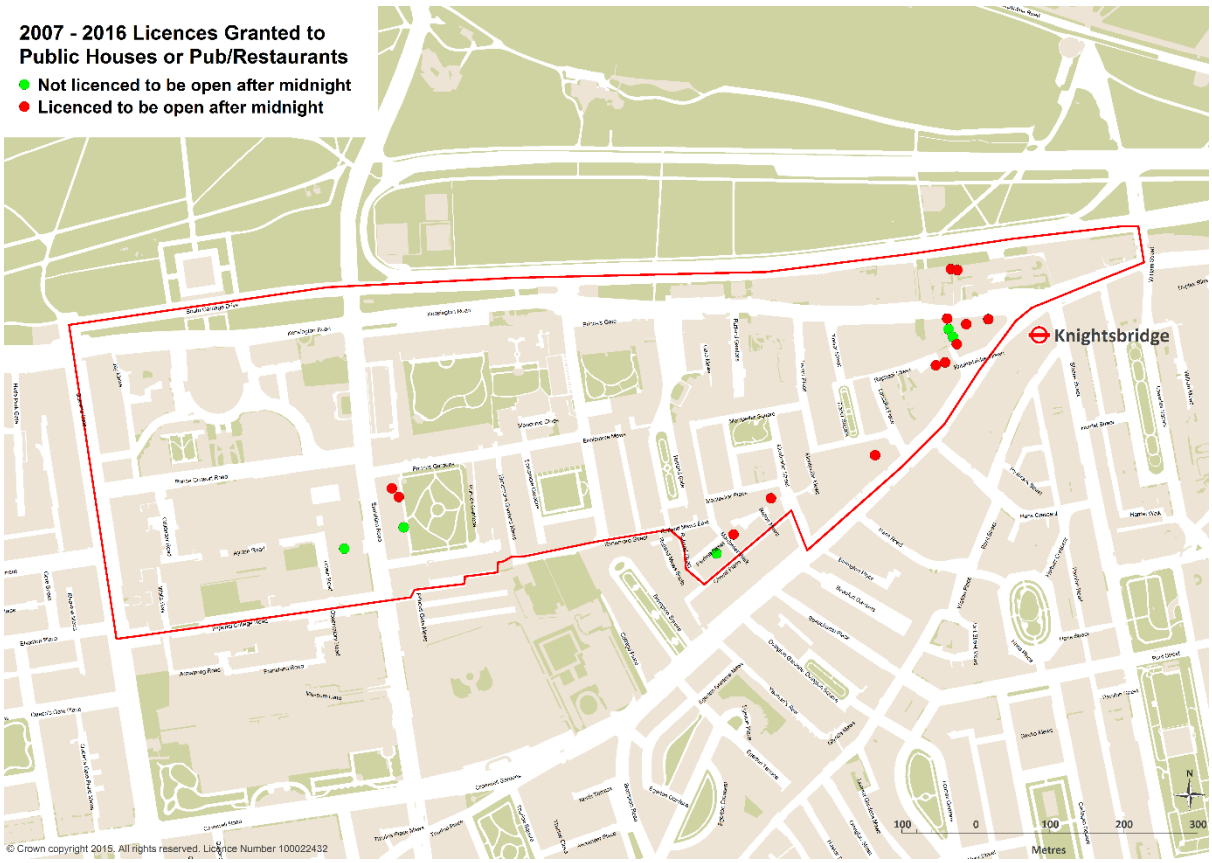
4.9 The engagement process revealed a keenness to limit the impacts of night-time and early morning activities in areas that border on residential areas. In particular noise, anti-social behaviour and litter were mentioned as problems. Whilst visitors are welcomed, increased

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 e.g. 3am.

4.10 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).

4.11 Figure 4.1 shows where late-night licences 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.

Figure 4.1: Late-night licences granted since 2007



Source: Westminster City Council

4.12 It is noted that these areas are also residential areas and are home to significant numbers of people.

4.13 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. Part of this is accounted for by WCC allowing such permitted uses to open until 00:30 Monday-Saturday and until 00:00 on Sundays.

KBR19: SECURITY AND RESILIENCE MEASURES

4.14 Safety and well-being was mentioned during the engagement phase, particularly in the context of more and more homes remaining empty for long periods as the 'buy-to-leave-trend increase. This has served to erode the sense of community and the very heart of Knightsbridge, already leaving some people feeling isolated and more vulnerable.

4.15 Knightsbridge has experienced three terrorist incidents including the Iranian Embassy siege (from 30 April to 5 May 1980), Hyde Park bombing (on 20 July 1982) and the Harrods car bombing (on 17 December 1983). It had previously experienced the Spaghetti House siege (from 28 September 1975).

4.16 This policy, seeking to ensure that new developments have appropriate security measures in the place to minimise these risks and increase resilience, conforms to London Plan Policy 7.3 (Designing out crime); and Westminster City Plan Policy S29 (Health, safety and well-being).

Sub-objective 4.2 Ensure new food, drink and entertainment uses are only permitted in areas where they already exist and when residential amenity can be demonstrably protected

POLICY KBR20: RETAIL USES IN THE PRIMARY SHOPPING FRONTAGES

4.17 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) and 4.7 (Retail and town centre development); Westminster City Plan Policy S21 (Retail); and Westminster UDP Saved Policy SS3 (Enhancing shopping in the International Centres' Primary Shopping Frontages).

4.18 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 4.2 shows that, in the area highlighted which is wider that the Primary Shopping Frontage, less than 20% of the ground floor units were occupied by international-quality retailers in October 2016. Furthermore, less than 37% were in any form of retail (Class A1) use.

4.19 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

4.20 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 take-aways. When expanding the area to include all units around the Neighbourhood Stress Area and the wider eastern part of the Area, this increases to 36% of the units, as shown in Figure 4.2. 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%[17].

4.21 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 take-aways serves to detract from this offer and from residential amenity.

4.22 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'[18]. Further loss of retail units to other uses will put this status under considerable threat.

[17] Source: Westminster City Council monitoring

[18] WCC (2008) *Primary Shopping Area 4 (Knightsbridge): Shopping Area Health Check Survey*, paragraph 1.31

Figure 4.2: Use of ground floor units in Knightsbridge along Primary Shopping Frontages, October 2016

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

POLICY KBR21: LOCAL RETAILING AND SERVICES

4.23 This policy seeks to retain local retail and services and conforms to London Plan Policies 2.10 (Central Activities Zone – Strategic priorities) and 4.7 (Retail and town centre development); Westminster City Plan Policy S21 (Retail); and Westminster UDP Saved Policy SS3 (Enhancing shopping in the international centres' primary shopping frontages).

Post Office in Raphael Street and convenience store on Brompton Road

POLICY KBR22: SMALL SHOPS AND PROFESSIONAL SERVICES

4.24 Resident stakeholders raised concerns over the lack of basic retail facilities, e.g. to buy a pint of milk and a newspaper. The only alternatives in the west of the area that avoid a lengthy journey for some people are to use the facilities at Imperial College which may only be open during term time. More generally there has been a steady loss of basic services, with shop units and restaurants being replaced by coffee or sandwich shops that predominantly serve the tourist market.

4.25 This policy protects the provision of these shops and services and conforms to London Plan Policies 2.10 (Central Activities Zone – Strategic priorities), 4.7 (Retail and town centre development), 4.9 (Small shops); Westminster City Plan Policy S21 (Retail); Westminster UDP Saved Policy SS3 (Enhancing shopping in the international centres' primary shopping frontages).

POLICY KBR23: PROTECTION OF PUBLIC HOUSES

4.26 The decline in numbers 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 re-development, is a good example of this. This policy seeks to safeguard the two remaining public houses where possible and conforms to London Plan Policy 3.16 (Protection and enhancement of social infrastructure).

Paxton Head and Tattersalls Tavern

POLICY KBR24: SHARED COMMUNITY USES

4.27 Isolation, particularly of older residents, and in the context of empty 'buy-to-leave' properties, is an issue in Knightsbridge. As with the decline 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 these sorts of uses and conforms to London Plan Policy 3.16 (Protection and enhancement of social infrastructure); and Westminster UDP Saved Policy TACE5 (Arts and cultural uses).

POLICY KBR25: OFFICE USES

4.28 The consultation revealed that the importance of retaining office space in the Area. The growth of fast-food outlets and cafés has particularly eroded provision. This policy seeks to support the business base in Knightsbridge and conforms to Westminster City Plan Policy S20 (Offices and other B1 floorspace).

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

POLICY KBR26: HOUSEHOLD AND COMMERCIAL WASTE CONSOLIDATION

4.29 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, often cited throughout the engagement process. It conforms to London Plan Policy 5.17 (Waste capacity); Westminster City Plan Policy S44 (Sustainable waste management); and Westminster UDP Saved Policy ENV12 (Waste and recycling storage).

Rubbish outside a short tenancy property

4.30 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 slightly 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 would help to address this. Examples from elsewhere in Europe show that this can be provided elegantly and using relatively little space.

Rubbish bins, Jay Mews

Example of a waste consolidation system in France

4.31 Possible locations for non-recyclable and recyclable waste systems are:

- 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.

Sub-objective 4.5 Ensure construction impacts are managed and reduced

POLICY KBR27: KNIGHTSBRIDGE CODE OF CONSTRUCTION PRACTICE

4.32 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 aims to minimise those impacts by requiring developments to meet the requirements of the Area specific Knightsbridge Code of Construction Practice. The policy conforms to London Plan Policy 5.18 (Construction, excavation and demolition waste).

4.33 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

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

4.35 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.

4.36 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)[19]. However, they do not fully address all of the issues that arise often due to the intensity of activity in the Area. Therefore a supporting policy framework 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.

[19] GLA (2014) *The control of dust and emissions during construction: Supplementary Planning Guidance*

OBJECTIVE 5.0 PROTECT AND ENHANCE EXISTING RESIDENTIAL AMENITY AND MIX

Sub-objective 5.1 Encourage a high proportion of occupied primary residences

POLICY KBR28: SHORT TERM LETS

5.1 This policy seeks to resist change of use of current buildings to short-term lets and conforms to London Plan Policy 3.8 (Housing choice); and Westminster City Plan Policy S15 (Meeting housing needs).

5.2 The policies within Westminster's City Plan Policy S15 (Meeting housing needs) states that, 'Residential developments will provide an appropriate mix of units in terms of size, type and affordable housing provision to contribute towards meeting Westminster's housing needs, and creating mixed communities'. The London Plan Policy 3.8 (Housing choice) seeks to 'meet the requirements for different sizes and types of dwellings'. For the community of Knightsbridge, this is particularly important. As the community changes it is vital that its housing needs are met.

5.3 The Westminster UDP recognises that Knightsbridge is one particular area where the conversion of single dwellings into multiple units can serve to change the stock of properties and can potentially mean that local needs are not addressed. UDP Saved Policy H5 (Providing a range of housing sizes) specifically prevents the conversion of a single dwelling house into more than one unit in Knightsbridge. This also applies to single dwelling houses above basement flats. This approach encourages long-term residents to remain in the area which maintains the sense of community. There have however also been changes observed in Knightsbridge which have served to reduce the stock of properties. Increasingly, existing properties are being altered to maximise floor area or convenience or through the amalgamation of adjacent properties into much larger properties. This most commonly occurs when members of the existing community leave or die, resulting in their property being bought by investors and often redeveloped. This is exacerbated by the fact that some of the new properties that are built in the wider area are not then occupied – the 'buy-to-leave' phenomenon. Between April 2010 and February 2016, there were 65 planning applications involving residential units in the Area, yet these only resulted in a net addition of five dwellings. More than half of these applications (54%) directly resulted in a net loss of dwellings. This is contributing towards the increasing challenge of under-occupation.

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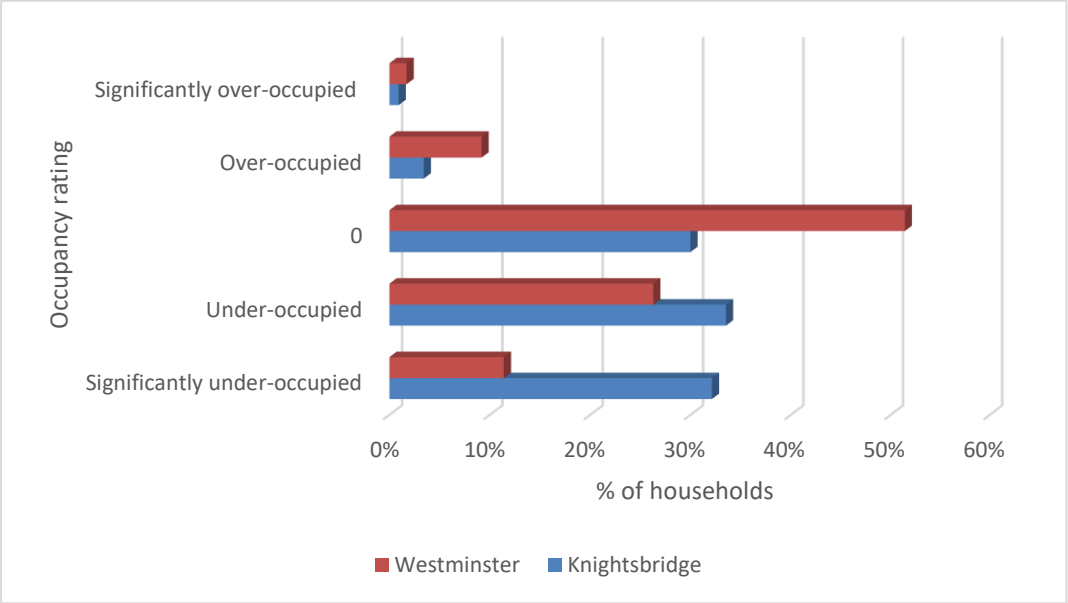
5.5 Figure 5.1 shows that the proportion of properties in the Area that are under-occupied is well above the Westminster average, with over 30% of properties being significantly under-occupied, i.e. having at least two spare bedrooms.

Figure 5.1: Occupancy levels compared to dwelling size, 2011



Source: 2011 Census

5.6 The fundamental effect that this development trend has is to reduce the size of the resident population. The reduction in the number of properties also makes it harder for people to come into the area because there are fewer units available and these units are therefore more expensive.

5.7 Westminster City Plan Policy S14 (Optimising housing delivery) protects against the loss of residential units. The only exceptions it permits are converted houses being returned to family-sized dwellings, two flats being joined to create a family-sized dwelling or the reconfiguration of affordable housing to better meet need.

5.8 In Knightsbridge several conversion trends have been occurring in recent years. The first has been lateral conversions which occur where two adjacent properties are redeveloped together to provide a single-floor flat on each floor which is spread across the two

properties. Maisonettes may also be created by combining flats where one is above another. The second trend is where two adjacent houses have been redeveloped together to make a single, double-fronted house. Westminster City Plan Policy S14 therefore supports such conversions.

5.9 A third trend involves a number a Houses in Multiple Occupation (HMOs), which were previously large single dwellings and were converted into a number of flats, being restored to their original form. There have been a number of examples of this happening in Rutland Gate and Ennismore Gardens where there are several HMOs which contain between six and 10 flats. Several of these have been returned to single properties resulting in a significant loss in the overall stock of property.

5.10 Westminster City Plan Policy S14, which seeks to protect against this, is therefore supported although it is noted that such developments have still been occurring in Knightsbridge. Given the importance of this phenomenon in the Area, it is considered important to add to City Plan Policy S14 by requiring any scheme that does meet the Policy S14 criteria for a net loss of dwellings to be required to also demonstrate that it is meeting a 'permanent' housing need (as distinct from investor or second home 'need') that is currently restricted by a limited supply of similar properties elsewhere in the Area at a similar price range.

Sub-objective 5.2 Encourage new residential developments to provide a range of housing in value and size

POLICY KBR29: RESIDENTIAL MIX INCLUDING HOUSING TO SUPPORT LOCAL WORKERS AND STUDENTS

5.11 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. This policy seeks to ensure that residential provision is of mixed sizes and tenure and conforms to London Plan Policy 3.8 (Housing choice); Westminster City Plan Policy S16 (Affordable housing); and Westminster UDP Saved Policy H4 (Provision of affordable housing).

Sub-objective 5.3 Encourage the restoration of period and other residential buildings to their original size and configuration where this will increase the number of units and discourage the loss of residential units

POLICY 30: RECONFIGURATION OF EXISTING RESIDENTIAL BUILDINGS

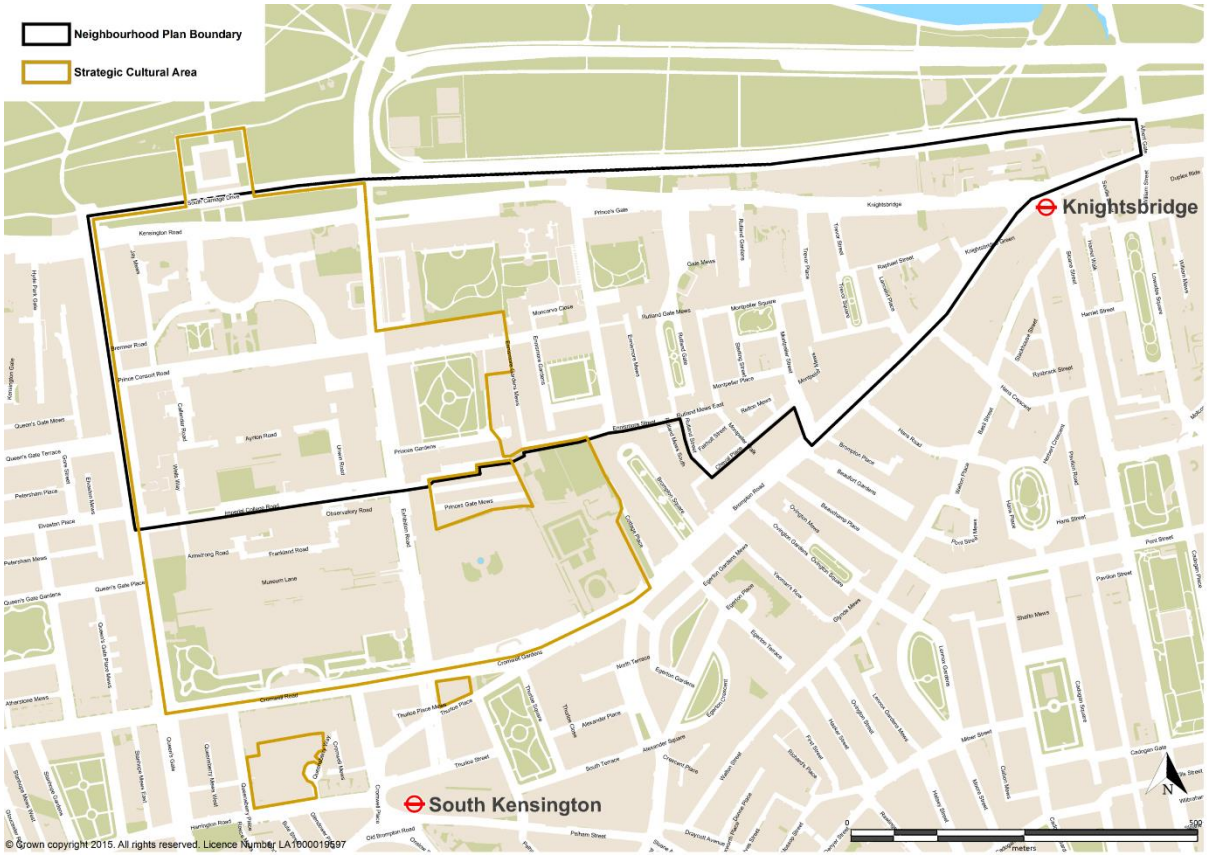
5.12 Resident stakeholders expressed concern over the amalgamation of units into larger homes, with the associated loss of smaller dwellings and resident numbers. It also meant that there was not a mix of dwelling sizes, which was felt to be the best way to retain a vibrant resident community.

5.13 This policy supports the restoration of residential buildings back to their original format while avoiding the loss of existing residential units and conforms to London Plan Policy 3.8 (Housing choice); Westminster City Plan Policy S14 (Optimising housing delivery); and Westminster UDP Saved Policy H5 (Providing a range of housing sizes).

KNIGHTSBRIDGE'S CULTURE AND EDUCATION

6.1 The policies in this section focus on the Strategic Cultural Area. The boundary of this stretches beyond the boundary of the Neighbourhood Plan area, as is shown in Figure 6.1 (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 Plan Area.

Figure 6.1: Strategic Cultural Area



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

6.2 The western end of the Knightsbridge 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 Commission's work continues to this day, its central aim being to continue to choreograph the 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 Commission continues to act as landlord for much of the original estate.

Imperial College

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 Plan 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 on the relevant policies of the neighbouring Royal Borough of Kensington and Chelsea development plan.

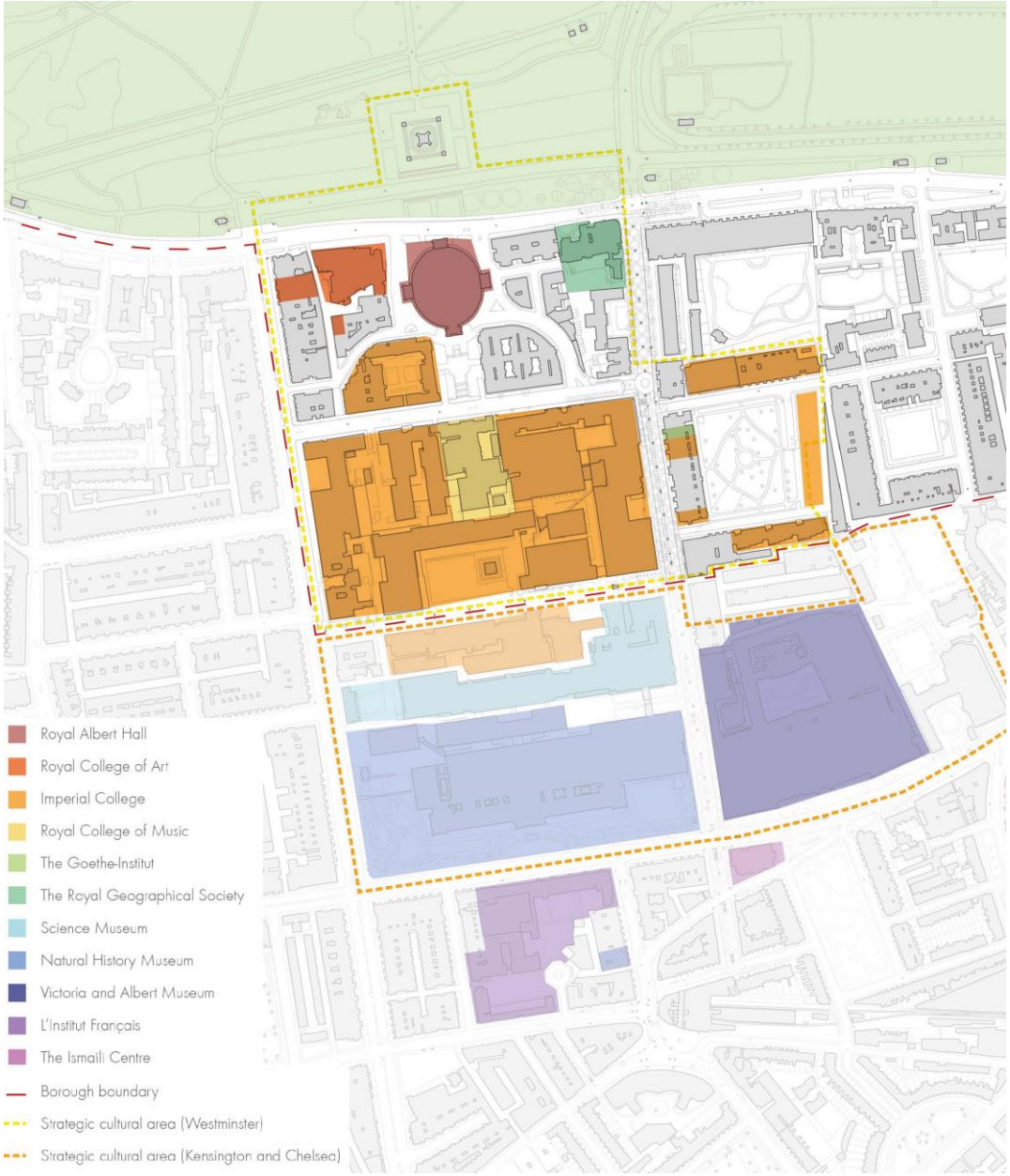
6.6 The Strategic Cultural Area hosts a wide range of cultural, education and research bodies. These diverse, dynamic and world-renowned activities which include training, outreach, research, teaching, performance, promotion, expertise, design and creation, writing, publishing, entertainment, exhibition underpin the special qualities of this cultural quarter.

In an increasingly competitive environment, 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 Westminster City Council and Knightsbridge Neighbourhood Plan 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 6.2 shows the extent of the Strategic Cultural Area and the estates of the principal cultural and education institutions.

Figure 6.2: 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 underestimated.

'Re-imagining Albertopolis'

Source: DSDHA

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 KBR31: 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 scale 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 cafes/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. Such development should not serve as an attraction in its own right and should 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, 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 6.4 Enhance the public realm to provide a clean, safe, attractive, welcoming and accessible place that meets the needs of residents, workers, students and visitors

POLICY KBR32: 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 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 Decisions 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 Decisions 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).

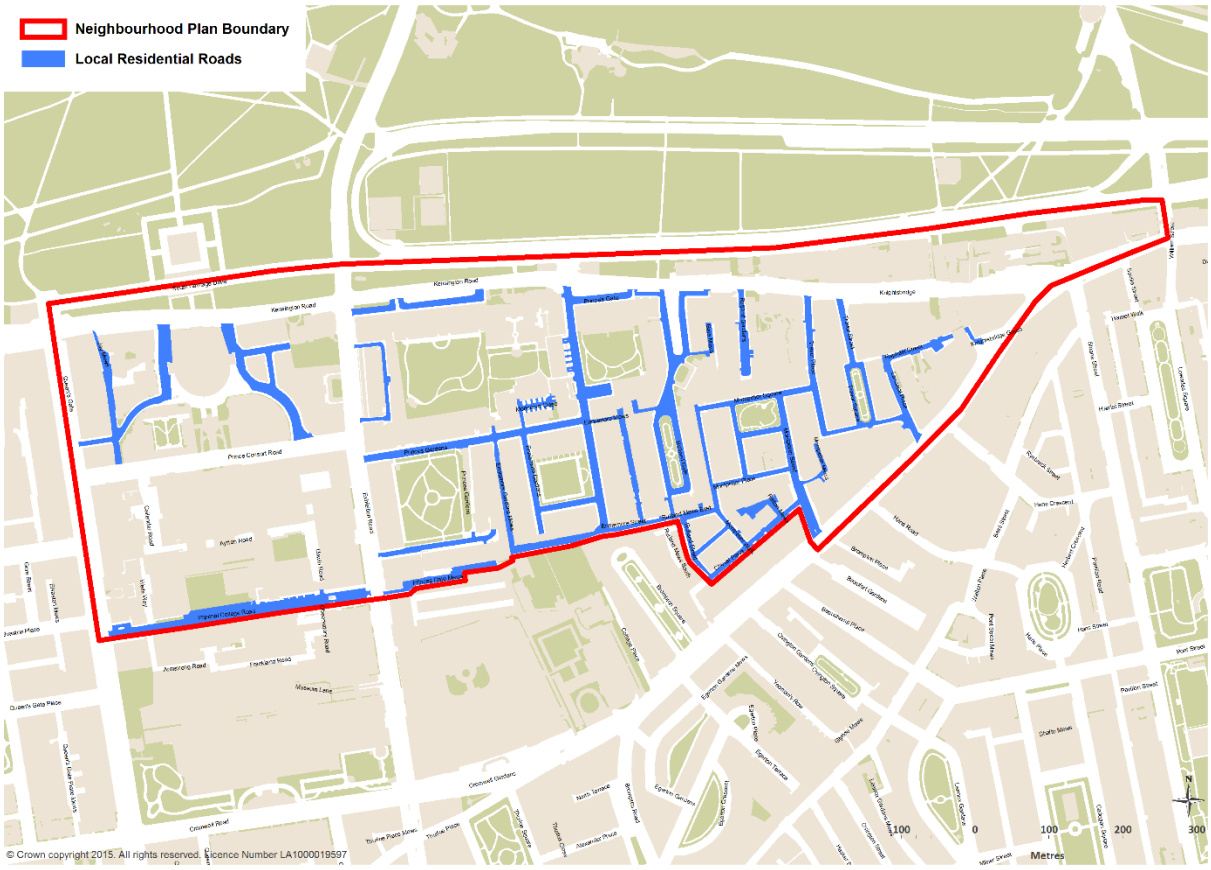
KNIGHTSBRIDGE'S PUBLIC SPACES AND UTILITIES

OBJECTIVE 7.0 ACTIVE TRAVEL AND PERSONAL MOBILITY

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

7.1 In Knightsbridge there is a clear distinction between the main arterial routes that carry the majority of traffic e.g. Brompton Road, Exhibition Road, Knightsbridge, Kensington Road and Prince Consort Road, and the smaller network of roads that are internal to the area. This network of Local Roads is particularly important for increasing active travel. These are shown in Figure 7.1.

Figure 7.1 Network of Local Roads



POLICY KBR33: ENABLING ACTIVE TRAVEL

7.2 This policy seeks to ensure that new development supports opportunities for cycling and walking – 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); Westminster City Plan Policy S41

(Pedestrian movement and sustainable transport); and Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).

Cycling in Knightsbridge

Lack of dedicated bicycle parking

7.3 The Knightsbridge 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 Knightsbridge 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 KBR34: MOVEMENT HIERARCHY

7.4 Speeding vehicles, rat running, noise, danger for pedestrians and air pollution were cited in consultations as the top five problems to address particularly for small residential streets. A hierarchy approach was considered to be correct (i.e. pedestrians then cyclists then vehicles).

7.5 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); Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).

Children walking along Exhibition Road

7.6 On arterial roads e.g. Red Routes and the Strategic Road Network and in parallel with Transport for London'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 to improve cycling along Brompton Road, e.g. segregated cycle tracks, should not slow down buses and they should ensure that they do not result in a reduction

in the amount of pavement space. Unless segregated cycle tracks are introduced in Brompton Road, the increasing number of cyclists is expected to slow traffic and cause conflict with pedestrians.

Sub-objective 7.3 Safe and quiet roads where there are no deaths or injuries from transport and where local access is allowed and noise and traffic speeds are reduced

POLICY KBR35: SAFE AND QUIET ROADS

7.7 The safety of roads for pedestrians and cyclists was often cited during the engagement process. There was a strong call from all stakeholders for 20mph speed limits throughout the Knightsbridge area and for them to be properly enforced.

7.8 This policy conforms to London Plan Policies 6.9 (Cycling), 6.10 (Walking); Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).

Sub-objective 7.4 Walking and cycling

7.9 Providing a safe and extensive cycle network is a London-wide aspiration and was confirmed as important to Knightsbridge too during the engagement phase. The London Cycling Campaign investigated the potential to provide high quality segregated 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 academics20 suggests that at least a third of recent London cycling deaths could have been prevented by such infrastructure.

7.12 Recent Canadian research[21] 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[22] 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 7.2 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 around 20 recorded injuries annually and that the major roads have particularly high casualty numbers, followed by the North-South routes, Queens Gate and Exhibition Road.

Figure 7.2 Cycling casualties 2005-2014

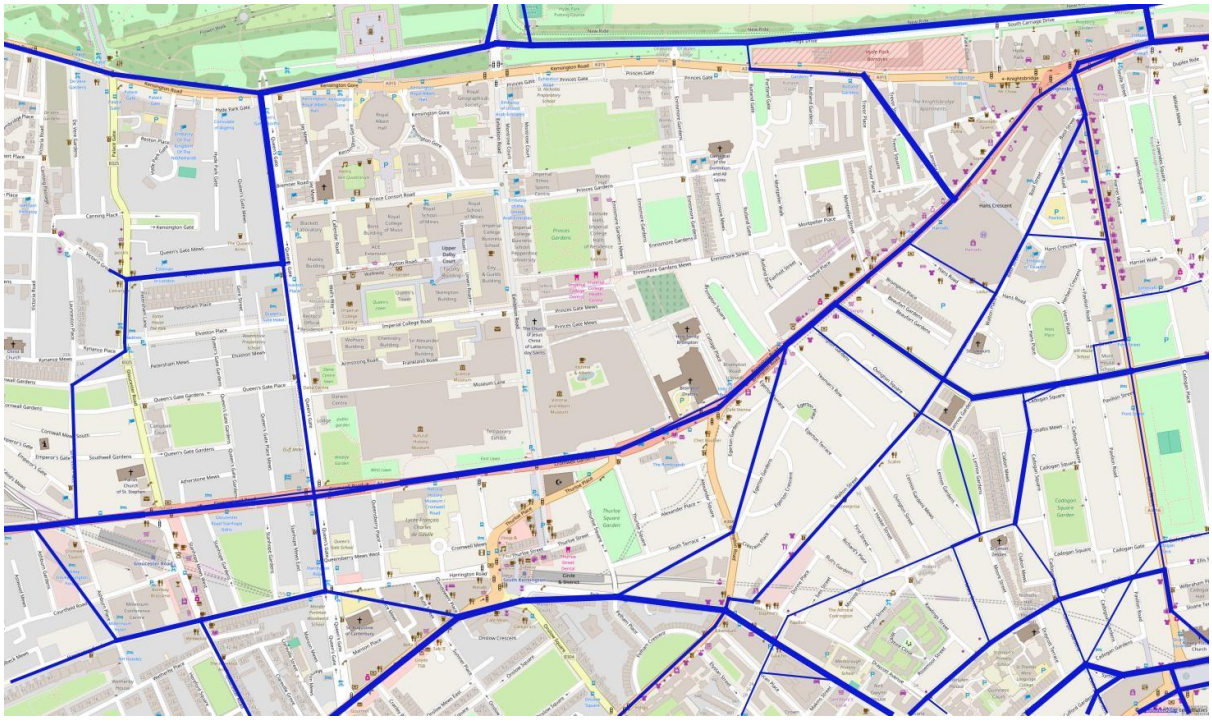
7.14 For Knightsbridge, it is important to consider where the key desire lines for cycling might be. The Propensity to Cycle Tool[23] (PCT) was employed as a starting point to identify cycle commuting demand in the area, using the Government Target scenario, which involves a doubling in cycling as per the London target. Figure 7.3 visualises the desire lines with wider lines having higher demand (up to 3,300 cycle commuters daily).

[20] http://content.tfl.gov.uk/pedal-cyclist-fatalities-in-london.pdf
[21] http://ajph.aphapublications.org/doi/pdf/10.2105/AJPH.2012.300762
[22] http://discovery.ucl.ac.uk/1476446/1/B66%20CGB%20Full%20Report.pdf
[23] www.pct.bike

7.15 There is strong demand along South Carriage Drive where a new cycle superhighway is being 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 segregated 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. Either Exhibition Road needs to be radically improved for cycling (either involving dedicated space for cycling or substantial reduction in through motor traffic) or Queen's Gate should be chosen for segregated cycle tracks.

Figure 7.3



POLICY KBR36: CYCLING AND WALKING INFRASTRUCTURE

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 This policy conforms to London Plan Policies 6.9 (Cycling) and 6.10 (Walking); Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and Westminster UDP Saved Policies TRANS3 (Pedestrians), TRANS9 (Cycling) and TRANS16 (The road hierarchy).

Mix of road users

Sub-objective 7.5 Fewer and cleaner vehicles that reduce congestion and total emissions

POLICY KBR37: MOTOR VEHICLE USE

7.20 Air pollution was agreed by stakeholders as a major issue that needed to be addressed, the main cause being diesel fumes from vehicles. 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); Westminster City Plan Policy S40 (Renewable energy); and 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 7.6 Electric charging infrastructure that is future proofed

POLICY KBR38: ELECTRIC VEHICLE INFRASTRUCTURE

7.21 The engagement 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); Westminster City Plan Policy S40 (Renewable energy); Westminster UDP Saved Policies TRANS1 (Protecting the environment from the effects of transport activities) and TRANS7 (Taxis and minicabs).

7.22 Development should provide the facilities to enable the residents, workers and visitors to the area to use electric motor vehicles by installing charging points. These should provide fast charging (two hour or faster) for paid parking bays and six hour or faster charging points for residential parking (Respark). This can either be physical charging stands (such as in the picture below) or wireless charging facilities that are now being trialled.

On-street electric charging point

Electric delivery vehicle, Cheval Place

7.23 At present, the provision of on-street electric charging points is limited in the Area. 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 and car clubs throughout the Area.

Car club in Princes Garden

OBJECTIVE 8.0 ENCOURAGE SUPERB PUBLIC TRANSPORT

Sub-objective 8.1 Efficient mass transit

POLICY KBR39: 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); Westminster City Plan Policy S41 (Pedestrian movement and sustainable transport); and 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 Hotel within the Area. Access to these stations from the Area is important. This is particularly the case for Knightsbridge station which has an access on the north side of Knightsbridge, right on the Area boundary.

8.3 Proposals to improve step-free access at Knightsbridge Underground Station are being taken forward by Transport for London (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 the Underground in terms of vibration and noise, and issue that has been identified as an issue 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.

Sub-objective 8.2 Zero emission public vehicles

8.6 There are no policies relating to this sub-objective.

OBJECTIVE 9.0 ENCOURAGE SUPERB UTILITIES AND COMMUNICATIONS INFRASTRUCTURE

Sub-objective 9.1 Exemplary utilities and connectivity

POLICY KBR40: UTILITIES AND COMMUNICATIONS INFRASTRUCTURE

9.1 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 Princes Gardens and Ennismore Garden. One knowledgeable stakeholder emphasised the seriousness of current drainage and sewerage problems and said much work is needed to achieve a 'sustainable drainage' system. Additionally, many residents felt that the broadband speeds were well below what they should be for such a central London location.

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).

Localised flooding in Stirling Street and Princes Gardens

New fibre broadband for business in Cheval Place

KNIGHTSBRIDGE'S ENVIRONMENT

OBJECTIVE 10.0 BE AN EXEMPLAR IN SUSTAINABLE CITY LIVING BY COMPLYING FULLY WITH INTERNATIONAL LAWS, STANDARDS, GUIDELINES AND BEST PRACTICE

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

POLICY KBR41: HEALTHY AIR

10.1 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); Westminster City Plan Policies S28 (Design) and S31 (Air quality); and Westminster UDP Saved Policy ENV5 (Air pollution).

Smog over London

Source: Flickr under Creative Commons

10.2 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_2) and particulates ($PM_{2.5}$ and PM_{10}) regularly exceeding guidelines which are set by the World Health Organisation (WHO) to ensure that the ambient air is safe to live in. 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[24], on top of causing disease from stroke, heart disease, lung cancer, and both chronic and acute respiratory

[24] https://www.london.gov.uk/sites/default/files/hiainlondon_kingsreport_14072015_final.pdf

diseases, including asthma.[25] Children who suffer poor air quality may have reduced lung capacity in adulthood.[26] 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.[27] For that reason development should seek to improve air quality, indoors and outdoors, wherever possible. Development which would lead to the deterioration of air quality will not be permitted.

10.3 Annual mean and hourly concentrations of NO_2 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, mean concentrations of NO_2 in Brompton Road were 74 micrograms per cubic metre (ug/m^3) in 2016 (up to 1 December) compared to the legal limit of 40 ug/m^3. The main sources of NO_2 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_x) (and $PM_{2.5}$) through planning policy.

10.4 There is evidence that developers would prefer to use electricity rather than gas boilers or combined heat and power units 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 KBR41 seeks to address this matter by supporting energy efficiency and electricity use and offsetting the incentive to install decentralised fossil fuel units.

10.5 Similarly, proposals should not deliberately expose people to the dangers of air pollution. Tables and chairs outside restaurants, bars and cafes, 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 nitrogen dioxide is unlikely to be exceeded in that location i.e. 200 ug/m^3. 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 KBR48 applies not only to all new development but to major refurbishment of buildings (Level 4 or above). This is a reasonable requirement in such refurbishments because the costs of compliance are incremental at worst rather than full replacement costs, e.g. in contrast to having to replace gas boilers in every building submitting a planning application that might otherwise meet its existing energy needs.

[25] http://www.who.int/mediacentre/factsheets/fs313/en/
[26] Ibid
[27] http://www.rotap.ceh.ac.uk/files/CEH%20RoTAP_0.pdf

POLICY KBR42: 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 source heat pumps.

10.8 This policy aims to match the ambitions of the Paris Agreement and mitigate climate change. Pending better energy storage mechanisms, this policy requires the use of 100% 'net' renewable energy use excluding fossil fuel or nuclear energy sources. 'Good Energy', for example, offers 100% renewable electricity today. KBR42 requires renewable only energy when better energy storage mechanisms exist. This policy prioritises action on new development and major refurbishments in order to maximise the opportunities and minimise the long term costs of reducing greenhouse gas and air pollutant emissions throughout the Area. It also supports the community's vision and objectives to be an exemplar in sustainable city living.

10.9 This policy supports and is complementary to KBR41 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 Buildings which have a zero carbon footprint

POLICY KBR43: ZERO CARBON DEVELOPMENT

10.10 As noted in the previous policy, sustainability was an important issue for stakeholders. 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 KBR44: NATURAL ENVIRONMENT

10.11 Access to green space within the Area is important to local people and was a strong theme running through the engagement process. This included providing green pockets wherever possible, with innovative ideas including green roofs and walls. It was important to all stakeholders that native species should be encouraged. This policy conforms to London Plan Policy 2.18; Westminster City Plan Policies S11, S35, S36, S38 (Green infrastructure: the multifunctional network of green and open spaces); and Westminster UDP Saved Policies ENV15 (Public and private open space) and ENV17 (Nature conservation and biodiversity).

Green space in Montpelier Square

Sub-objective 10.4 Maximising the environmental benefits of trees

POLICY KBR45: TREES

10.12 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 with a focus on native species. This policy seeks to address this and confirms to London Plan Policy 7.21 (Trees and woodlands); and Westminster UDP Saved Policy ENV16 (Trees and shrub cover).

Trees in Trevor Square

Trees in Hyde Park

10.13 WCC's Supplementary Planning Guidance, 'Trees and Public Realm – A Tree Strategy for Westminster'[28], 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.

10.14 Management of trees is important. Contractors that are 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. Burning or open fires should not be permitted in the Knightsbridge Area including Local Green Spaces.

10.15 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.

10.16 Policy KBR11 requires landscaping and tree planting to be an intrinsic part of new development proposals. Whilst some types of minor development such as small extensions, new signage, etc., clearly cannot be expected to make such provision, many new developments should provide more greening as part of well-designed schemes.

10.17 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 KBR12), even if it is to be replaced, should be accompanied by a 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.

10.18 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[29]. It is therefore not a case of simply replacing this 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.

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[28] http://transact.westminster.gov.uk/docstores/publications_store/Trees_&_the_Public_Realm_Adopted_Strategy_September_2011.pdf

[29] http://www.telegraph.co.uk/news/2016/07/30/tree-disease-could-wipe-out-londons-most-historic-vistas/

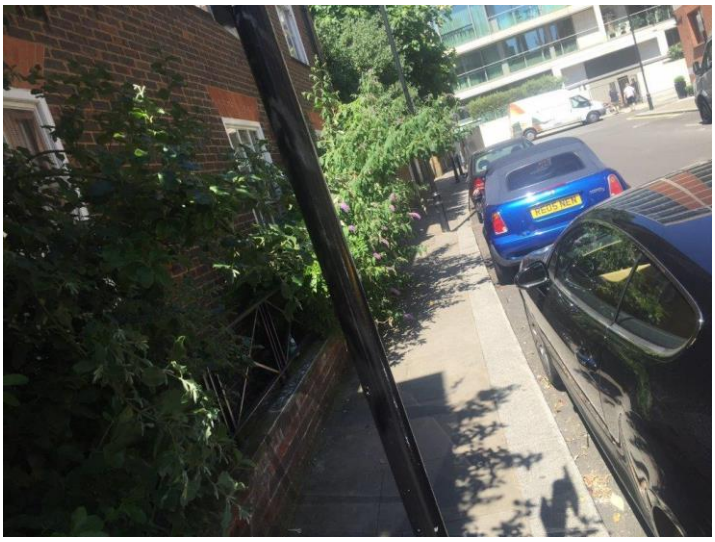
London plane trees

Source: Flickr under Creative Commons

10.19 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 planting, by its very nature, is an activity for the long term.

10.20 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 KBR46: SUSTAINABLE WATER

10.21 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).

10.22 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.

10.23 The impacts that water has on the city of 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. 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.

10.24 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 seek to 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.

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

POLICY KBR47: HEALTHY PEOPLE

10.25 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); and Westminster City Plan Policy S29 (Health, safety and well-being).

10.26 The Knightsbridge Code of Construction Practice (Policy KBR28) aims to contribute towards a target reduction in ambient and nuisance noise of 5dB every five years towards a minimum level of WHO guideline dB. This should be read alongside the City of Westminster's Code of Construction Practice and the Considerate Contractors Scheme all of which detail how the impact of traffic and construction on residential amenity will be adequately mitigated. The Knightsbridge Code of Construction Practice sets exemplary standards of construction practice and thus will override any less stringent provisions in the Westminster Code of Construction Practice and the Considerate Contractors Scheme. It also aims to avoid the need for the community to repeat comments on many planning applications.

Activity in Hyde Park

Sub-objective 10.7 Involving people by recognising that environmental protection is achieved when people are fully engaged in policies and decisions affecting the environment

POLICY KBR48: INVOLVING PEOPLE

10.27 This policy seeks to ensure community involvement in development. It is considered that the current system adopted by WCC does not meet international standards of public participation and does not produce a genuinely active discussion between stakeholders. In particular, KNF wants to ensure that there is active two-way discourse with relevant stakeholders so that the best solutions are found to the challenges that face and will face the Area.

Engaging through the Neighbourhood Plan process

10.28 KNF aims to set an example of how to properly apply international standards such as the Aarhus Convention and has developed and adopted the Knightsbridge Community Engagement Protocol to ensure information, participation and justice. In particular it:

- Applies the principles in the United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. This will mean that all residents, workers, students and visitors to the KNA should:
    - be given access to information from the relevant stakeholder so that they are in a position to understand plans, programmes, projects and policies that are brought forward in the neighbourhood that relate to and impact on the environment. Sufficient information should be provided to allow the

community to actively participate in any discourse related to the plans, programmes, projects and policies. Information should be provided by the relevant stakeholder on both a passive and an active basis as the situation requires.

  - be engaged in meaningful consultation at an early stage, preferably in the initial design phase, and throughout development processes. This means the relevant stakeholder should aim to work with the community to bring forward plans, programmes, projects and policies which are acceptable to all parties who will be affected. In particular, the relevant stakeholder should consider whether they should engage in early consultation with the Knightsbridge Association (or successor organisations identified by the Knightsbridge Community Engagement Protocol) and other community organisations.
  - have access to justice and remedies that are effective and proportionate where the Knightsbridge Community Engagement Protocol is not followed.

- Encourages the local community to be innovative and bring forward community-led proposals for development. The Knightsbridge Community Engagement Protocol will propose a process by which advice can be sought by the local community to empower them to bring forward development proposals.
- Encourages decision makers to apply the 'Precautionary Principle'.
- Requires financial transparency in a report annually by WCC on the amount, form and use of any contributions from developers to others such as the WCC Planning Authority, Transport for London and/or Mayor of London relating in any way to developments within the Area.
- Requires an independent post-completion assessment for each development to determine 'real world' emissions to air, land and water with penalties if these materially exceed assumptions in the original planning application.
- Seeks to create and re-invent governance coalitions and new approaches to community engagement that involve national, London and local levels of government with businesses, cultural and educational institutions and citizens; and
- Encourages lifestyle changes amongst the local community by providing information about the latest technologies and best practices to mitigate and adapt to challenges locally rather than transferring them to others now or later.

10.29 This policy conforms to NPPF paragraphs 69 and 188.

DEVELOPER CONTRIBUTIONS

POLICY KBR49: DEVELOPER CONTRIBUTIONS

11.1 This policy conforms to Westminster City Plan Policy S33 (Delivering infrastructure and planning obligations.