

KNIGHTSBRIDGE NEIGHBOURHOOD FORUM

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Your reference: 01/JK/KNP

4 April 2018

Dear Jill

Knightsbridge Neighbourhood Plan Examination

Thank you again for your letter dated 6 March 2018.

The Knightsbridge Neighbourhood Forum (the “Forum”) is grateful for the opportunity to provide the Examiner with the Forum’s views on the points raised by consultees during the Regulation 16 consultation on the Knightsbridge Neighbourhood Plan (the “Plan”).

The Forum encloses its detailed comments on the Regulation 16 consultation responses in the form of the following four appendices:

1. A table with detailed comments on responses itemised and listed by response number 1-99;
2. Part One: Knightsbridge Neighbourhood Plan with track changes of proposed amendments;
3. Part Two: Knightsbridge Management Plan with track changes of proposed amendments; and
4. Schedule with proposed track changes to Part Three: Knightsbridge Evidence Base^{1,2}

The Forum was pleased to note that most of the 99 consultation responses were supportive of the Plan. For example, the Greater London Authority, writing on behalf of the Mayor of London, concluded:

“The Mayor of London is of the opinion that the Knightsbridge Neighbourhood Plan is in conformity with the London Plan.”

There were, however, a few adverse representations. The majority of these were from Westminster City Council (“WCC”), the Defence Infrastructure Organisation (“DIO”) and the Westminster Property

¹ Due to the small number of proposed amendments to Part Three compared to the length of the document, the suggested amendments are listed in a schedule (rather than as track changes to the whole document).

² Please note that these documents do not incorporate minor errors identified in the errata list submitted with the Forum’s letter of 12 February 2018 (KNP58). The Forum suggests that the examiner considers the errata identified by the Forum before any other amendments to the KNP to minimise formatting or numbering issues.

Association (“WPA”) who all have interests ‘within’ the Knightsbridge Neighbourhood Area (the “Area”) and the Royal Borough of Kensington and Chelsea (“RBKC”) and Prince’s Gate Mews Residents Association (“PGMRA”) who represent residents located adjacent to but ‘outside’ the Area.

The Forum considers that some of the comments justify making a number of minor amendments to policies, text and other material in the Plan in order to improve the Plan and its effectiveness – these are set out in the attached documents. In the Forum’s opinion, these proposed amendments do not change the original intention of policies of the Plan and are not so significant as to risk undermining the public engagement and consultation undertaken on the draft Plan to date.

Having carefully considered the Plan, the responses, our proposed amendments, and expert and legal advice, the Forum remains of the view that the Plan, as amended, meets the Basic Conditions. The Forum also confirms that it still does not see the need for an oral hearing but would be pleased to attend one if held.

Draft National Planning and Policy Framework

The Forum has briefly considered the draft National Planning and Policy Framework (NPPF) which was published for consultation on 5 March 2018. As the Examiner will be aware, the draft NPPF states that any newly adopted NPPF does not apply, for the purposes of examinations to development plans submitted before its adoption.³

The Forum does not therefore propose to comment on the draft NPPF in the context of the examination of the Plan.

Mayor’s Transport Strategy

The Forum notes that the Mayor’s Transport Strategy was published on 19 March 2018. The Forum considers that it supports the approach taken in the Plan.

Other

In its representations, the GLA has suggested that the Forum should consider whether an early review of the Plan is required to take account of any changes to strategic policies in the draft New London plan, such as the Central Activities Zone, Town Centres and housing delivery. The Forum notes this advice and intends to consider this request in due course, subject to resources.

Please contact me if you have any questions.

Yours sincerely

Simon Birkett
Chair
Knightsbridge Neighbourhood Forum

cc: Sean Walsh, Westminster City Council

³ Annex 1: Implementation in the draft NPPF (paragraph 209 on page 60)