

# INDEPENDENT EXAMINATION OF THE QUEEN'S PARK NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSC MRTPI

Gill FitzHugh  
Queen's Park Community Councillor

Michela Leoni  
Westminster City Council

Examination Ref:01/JK/QPNP

22 February 2021

Dear Ms FitzHugh and Ms Leoni

## QUEEN'S PARK NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Queen's Park Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters.

### 1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

I have not yet undertaken a detailed assessment of the Plan, but I have not at this initial stage identified any very significant and obvious flaws in it that might lead me to advise that the examination should not proceed. However, I have some questions relating to the consultation carried out in respect of the Plan, and these are set out in the Annex to this letter.

### 2. Site Visit

I intend to undertake a site visit to the neighbourhood plan area (subject to on-going Government advice relating to the COVID-19 outbreak) as soon as is reasonably practicable, following receipt of your replies to my questions concerning the consultation exercise.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process (and further respecting the current COVID-19 distancing arrangements).

### 3. Written Representations

At this stage I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. Nevertheless, I will reserve the option to convene a hearing should a matter or matters come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

#### 4. Further Clarification

I have a number of initial questions for the Community Council seeking further clarification on points raised by Westminster City Council, Thames Water and Knightsbridge Neighbourhood Forum in their Regulation 16 consultation responses. These questions are set out in the Annex to this letter. I would be grateful if a written response could be provided by **8 March 2021**.

#### 5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan.

However, in view of the additional information which I have requested I must provide the opportunity for you to reply. Consequentially, the examination timetable will need to be extended. Please be assured that I will seek to mitigate any delay as far as is possible. The IPe office team will keep you updated on the delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Community Council and Local Authority websites.

Thank you in advance for your assistance.

Your sincerely

*Jill Kingaby*

Examiner

## Annex

From my initial reading of the Queen's Park Neighbourhood Plan and the supporting evidence, I have a number of questions for the Queen's Park Community Council (QPCC). I also have a Regulation 16 consultation query for Westminster City Council (WCC) included in question 1. I have requested the submission of a response by **8 March 2021**.

### 1. Neighbourhood Plan Consultation.

I have a preliminary question relating to consultation and would be most grateful if you could provide me with any additional relevant information. The Consultation Statement 2014-20 states, on Page 3, that Queen's Park is one of the most deprived neighbourhoods in Westminster, and this has meant that residents tend not to respond to formal public consultation. I appreciate the difficulty for neighbourhood planning which these socio-economic conditions cause, and note the research finding that nationally, only 4% of neighbourhood plans are completed in areas of high-level deprivation.

The Consultation Statement provides details of consultation activities carried out between 2013 and 2017 by the QPCC. The Regulation 14 consultation exercise, October-December 2017, is described on Page 10 onwards of the Consultation Statement. Short versions of the Neighbourhood Plan were circulated in the local newspaper, placed on the QPCC website and made available in libraries, and three open meetings were arranged for residents. Appendix 3 provides additional detailed information as to how households and others were consulted. Page 13 of the Statement notes that "*QPCC received little formal response from residents*", although it does inform that shops on Canal Terrace and aspirations for a second pedestrian bridge over the canal were raised by residents at meetings. It would be helpful to know from the **Community Council** how many people attended the open meetings, and precisely how many written responses were submitted by residents and other stakeholders at the Regulation 14 stage (excluding statutory bodies as Pages 12 & 13 of the Statement explains their involvement)?

I understand that the Regulation 16 consultation exercise on the submitted Neighbourhood Plan 2020-2040, dated April 2020, was undertaken between November 2020 and January 2021. I have received and read copies of seven responses from:

Westminster City Council  
Knightsbridge Neighbourhood Forum  
Thames Water  
Natural England  
Port of London Authority  
Sport England, and  
Simon Walton.

Please would **Westminster City Council** confirm that I have a complete set of the consultation responses. It would also be helpful to know how exactly people were approached/engaged at the Regulation 16 stage.

In addition, could the **QPCC** let me know what work was carried out after the Regulation 14 exercise, ie. between 2018 and the end of 2020, to engage with the local community, before producing the submission version of the Neighbourhood Plan.

## **2. Westminster City Council response to the submission draft Queen’s Park Neighbourhood Plan (Regulation 16)**

This response, dated 21 January 2021, contains detailed questions and comments on the Plan, under the following headings:

- General drafting
- Why Queen’s Park needs a neighbourhood plan
- How the Plan fits into the planning system
- Local planning context
- Policy objectives
- Policies - 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10
- Chapter 3: Projects
- Annex 1: Evidence base.

It would assist my examination if the **Community Council** could explain its response to all the points raised by WCC, bearing in mind that WCC will be determining planning applications relating to development in Queen’s Park over the time period of the Neighbourhood Plan. The Community Council may wish to discuss the points raised with WCC and produce a Statement of Common Ground clarifying whether or not modifications to the policies and text of the submitted plan should be made. I would appreciate it if the Community Council would set out the precise wording of any modifications which are agreed. Also, if the Community Council does not support modifications of particular policies and text, a brief explanation as to its position/reasoning would be helpful.

## **3. Knightsbridge Neighbourhood Forum (KNF) response to the submission draft Queen’s Park Neighbourhood Plan (Regulation 16)**

KNF requested that Objective 3 be changed from “a low carbon agenda” to “the achievement of net zero carbon emissions”. Would the **Community Council** support such a change, and what is its reasoning?

## **4. Thames Water response to the submission draft Queen’s Park Neighbourhood Plan (Regulation 16)**

Thames Water requested that the Plan should encourage developers to contact them ahead of the submission of planning applications. Would the **Community Council** support such a change, and what is its reasoning?