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and examinations

Report on Belgravia Neighbourhood Plan 2023-2040

An Examination undertaken for Westminster City Council with the support of the Belgravia Neighbourhood Forum on the May 2023 submission version of the Plan.

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Main Findings - Executive Summary

From my examination of the Belgravia Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Belgravia Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – Belgravia Neighbourhood Area, shown on Figure 2.1 in the Plan;
- The Plan specifies the period to which it is to take effect – 2023-2040; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Belgravia Neighbourhood Plan 2023-2040

- 1.1 Belgravia is located in Central London, within the City of Westminster. Its western edge aligns with the boundary for the London Borough of Kensington & Chelsea. Hyde Park Corner sits within the north-eastern corner of Belgravia; Hyde Park, Buckingham Palace Gardens and Green Park lie to the north and east of the Neighbourhood Plan Area. Victoria rail station is located just outside Belgravia, to the east. Ebury Bridge Road and Chelsea Bridge Road meet at the southern edge of the Plan area, giving access across the River Thames to South London. In the early nineteenth century, the flat land of Belgravia was developed as a primarily aristocratic residential area with formal streets and squares, following a grid pattern. Belgravia remains an essentially tranquil area of London with high-end housing. In the late 1800s, homes for working class people were provided by the Improved Industrial Dwellings Company in new model flats at Coleshill, Lumley Flats and Ebury Buildings. The last block (Ebury Buildings) was bombed in the Second World War and replaced in the 1960s by Semley House. Social housing in these blocks and on a number of smaller sites provide social housing for about 10% of today's local residents.

- 1.2 Major change close to the predominantly residential area of Belgravia also occurred in the 1800s with the opening of Victoria Station, outside but adjacent to the Belgravia Neighbourhood Area. Its opening enabled passengers from across the home counties to reach Westminster, Buckingham Palace and the heart of the West End. The station also developed as a starting-point for international rail travel services, including the Golden Arrow and Orient Express. Direct train services to Gatwick Airport grew in the 1950s, and the opening of Victoria Coach Station (within Belgravia Neighbourhood Plan Area) occurred in 1932. These transport facilities have had major effects on footfall within the Neighbourhood Area and have affected its environment and character. Pre-Covid, Victoria Mainline Station catered for more than 80 million passenger trips per year. Victoria Coach Station handled 14 million passenger trips, and more than 470,000 coaches per year were estimated to travel through Belgravia's streets.
- 1.3 Much of the Belgravia Neighbourhood Area, as shown in Figure 5.1 of the Plan, constitutes the Belgravia Conservation Area. The Draft Belgravia Conservation Audit 2013 states that "The distinctive character of the area derives from the combination of opulent cream stucco terraces, spacious streets and the verdant garden squares on which these are set" . Parts of the Albert Gate and Grosvenor Gardens Conservation Areas are also within the Belgravia Neighbourhood Area. In addition to the grand terraces and squares, and often hidden behind them, are distinctive mews streets and small artisans' houses, set around yards and alleys, as shown in Figure 5.2.
- 1.4 Figure 6.1 of the Plan shows that a significant part of Belgravia is within the London Central Activities Zone (CAZ), where the Westminster City Plan states that growth will be focussed to deliver commercial-led and mixed use development (office, leisure and retail floorspace) alongside new homes. Land adjoining Buckingham Palace Road forms part of the Victoria Opportunity Area (Figure 2.2), where many commercial buildings serve a variety of business interests, and additional homes and jobs are to be provided in the future. Figure 6.1 also shows existing local centres, as defined in the Westminster City Plan, at Motcomb Street, Elizabeth Street, Pimlico Road and Ebury Bridge Road. These offer retail and other services to residents and workers. Regarding the road network, Belgravia is bounded by four designated primary routes which carry considerable amounts of traffic across London i.e. Knightsbridge (A4), Grosvenor Place (A3214), Buckingham Palace Road (A3215) and Ebury Bridge Road (B313). Significant volumes of traffic, including buses, coaches and commercial vehicles, also pass through the predominantly residential streets of Belgravia.
- 1.5 Belgravia Neighbourhood Area was designated by Westminster City Council in March 2014 and the Neighbourhood Forum was designated in

October 2014 (and further re-designated in January 2020¹). An interim Working Group, formed to discuss the constitution and business of the Forum, was replaced by a formally elected Steering Group in September 2015. Public drop-in events were held in June 2016 to explore the community's likes and dislikes of the neighbourhood and initiate an ongoing consultation process. A draft Neighbourhood Plan was shared for comment with Westminster City Council in August 2021, prior to the production of a Plan for consultation under Regulation 14 of the Neighbourhood Planning (General Regulations) 2012 (as amended) ('the 2012 Regulations'), from 4 July to 2 September 2022. The Submission Stage (Regulation 15) and Regulation 16 Consultation Version of the Neighbourhood Plan, which is the subject of this examination, was produced in May 2023.

The Independent Examiner

- 1.6 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Belgravia Neighbourhood Plan by Westminster City Council, with the agreement of the Belgravia Neighbourhood Forum.
- 1.7 I am a chartered town planner and former government Planning Inspector, with prior experience examining neighbourhood plans within Central London and elsewhere. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.8 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.9 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.

¹ As a consequence of Section 61F(8)(a) of the 1990 Act. View the redesignation decision here: [Decision - Belgravia Neighbourhood Forum Re-designation and Chelsea Barracks Neighbourhood Area Application | Westminster City Council](#)

- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the 2012 Regulations.

1.10 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.11 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law)²; and
- Meet prescribed conditions and comply with prescribed matters.

1.12 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Development Plan does not breach the requirements of

² The existing body of environmental regulation is retained in UK law.

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Westminster City Council, not including documents relating to excluded minerals and waste development, is the Westminster City Plan 2019-40, adopted in August 2021, and the London Plan, also adopted in 2021.
- 2.2 Planning policy for England is set out principally in the National Planning Policy Framework (NPPF). This is accompanied by the Planning Practice Guidance (PPG) which offers guidance on how this policy should be implemented. All references in this report are to the latest iteration of the NPPF⁴ and the accompanying PPG.

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
- the draft Belgravia Neighbourhood Plan 2023-2040 [May 2023];
 - Map [Figure 2.1] of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement [May 2023];
 - the Basic Conditions Statement [April 2023];
 - the Strategic Environmental Assessment (SEA) Screening Report and Habitats Regulation Assessment (HRA) [April 2023], prepared by Westminster City Council;
 - all the representations that have been made in accordance with the Regulation 16 consultation; and
 - the response from the Forum of 27 October 2023 to my letter of 3 October 2023.⁵

³This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

⁴ A new version of the NPPF was published during the examination on 5 September 2023. It sets out focused revisions (to the previously published version of 20 July 2021) only to the extent that it updates national planning policy for onshore wind development. As such, all references in this report read across to the latest 5 September 2023 version.

⁵ View the submission documents, submission consultation, and examination documents at: <https://www.westminster.gov.uk/planning-building-control-and-environmental-regulations/planning-policy/neighbourhood-areas-forums-and-plans/belgravia-neighbourhood-plan-0>

Site Visit

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 28 September 2023, to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. The Forum's response of 27 October 2023 to my queries about the Neighbourhood Plan contains 93 'Forum Items' (FIs), many of which include proposed wording for modifications put forward by the Forum to the submitted Plan. In several cases, the PMs which I put forward either coincide with or include elements of the Forum's proposals. For ease of reference, I have listed my modifications in Appendix 1 to this report and have included in them the FIs from the Forum's response of 27 October 2023, where I consider them appropriate. For convenience, this document is attached as Appendix 2 to my report.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 As note in paragraph 1.5 above, the Belgravia Neighbourhood Plan has been prepared and submitted for examination by Belgravia Neighbourhood Forum, which is a qualifying body. The neighbourhood area was designated by Westminster City Council in March 2014. The Forum was designated in October 2014 and, upon the expiry of the statutory five year period, was redesignated in January 2020.
- 3.2 It is the only Neighbourhood Plan for Belgravia and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2023 to 2040.

Neighbourhood Plan Preparation and Consultation

- 3.4 Door-to-door calling, leaflet drops at homes and businesses, advertising on the Forum's website and word of mouth contacts, were used by the Forum to boost membership and develop a Steering Group, in 2014-15. Public drop-in events, undertaken in June 2016, attracted 175 people, and provided an initial understanding of the issues which most concerned the community of Belgravia. An open meeting for the Neighbourhood Plan in October 2016 was attended by some 100 people, who were invited to comment on the themes identified in the earlier round of consultation. In 2018, a quantitative survey focussed on planning matters was undertaken, to provide robust data, with a sizeable sample base and answers to detailed questions. 2,000 questionnaires with 60 questions were delivered by hand to approximately half of the residential population. An additional 300 questionnaires were sent to shops and offices, and key institutions such as schools and churches. 311 responses were received (13%), which enabled the Forum to identify four key issues for planning the future of Belgravia.
- 3.5 A second Open Meeting took place in November 2018, and two focus groups were formed in March 2019, to extend the coverage of local residents, and ensure that the views of local businesses were being fully considered. In May 2020, an online survey was carried out to understand what was meant by the term "village feel", which had featured in earlier survey results. Forum activity was somewhat constrained in the first year of the Covid pandemic, but an open meeting took place online, via Zoom, in December 2020, following advertising online and the delivery of 2,000 leaflets to homes in the neighbourhood. The presentation set out four key objectives for the Plan, with 15 potential policies and 13 non-policy actions.
- 3.6 In 2021, the outline concept was developed into a fully drafted Plan and was shared with Westminster City Council for comment. The policies were presented to key stakeholders in January 2022, including all Steering Group members, 370 members/former survey respondents, local residents' amenity societies, churches, local traders' associations for local centres and other interested parties. In addition, a face-to-face meeting was held with Grosvenor Estate, the major landowner in Belgravia, in June 2022. Feedback from the above activities was used to develop a draft Neighbourhood Plan prior to its consultation under Regulation 14. Throughout the process, the Forum Consultation Statement makes clear that the Steering Group was keen to engage with all sections of the community, including those hard-to-reach in a densely populated part of London.
- 3.7 Regulation 14 consultation took place between 4 July and 2 September 2022. The Appendix to the Consultation Statement indicates the Forum's detailed response to the comments received, and sets out modifications which were subsequently made, before the Plan was submitted to Westminster City Council for further consultation under Regulation 16.

That took place between 2 June and 24 July 2023, and yielded 28 responses. I am satisfied that the consultation process has endeavoured to engage with all residents, statutory bodies and non-statutory bodies, representing local landowners, businesses, community institutions and neighbouring forums. I consider that the consultation process has met the legal requirements i.e. procedural compliance, and has had regard to the advice in the PPG on plan preparation and engagement.

Development and Use of Land

3.8 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

3.9 The Plan does not include provisions and policies for 'excluded development'.⁶

Human Rights

3.10 The Basic Conditions Statement for the Neighbourhood Plan concludes, in paragraph 5.3, that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998). Westminster City Council and other parties have not advised otherwise. From my independent assessment, I conclude that the Plan does not breach or otherwise show incompatibility with the European Convention on Human Rights.

4. Compliance with the Basic Conditions

EU Obligations

4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Westminster City Council, which found that it was unnecessary to undertake SEA (paragraph 5.2 of the Screening Report). Having read the Strategic Environmental Assessment Screening Report, I support this conclusion.

4.2 Belgravia Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA) by Westminster City Council, which noted that Belgravia is in relatively close proximity to four Special Areas of Conservation and two Special Protection Areas. The Council observed that the potential future arrival of Crossrail at Victoria Station and associated development within the Victoria Opportunity Area could have "in combination" effects with the Neighbourhood Plan. However, the Belgravia Neighbourhood Plan does not allocate any sites for development, and is focused on protecting amenity and encouraging

⁶ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.
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sustainable design that responds to character and heritage etc. Therefore, the City Council considers it unlikely that any proposals in the Plan will result in any significant effects to European sites alone, or in combination with other projects. Natural England, Historic England and the Environment Agency agreed with this conclusion. From my independent assessment of this matter, I have no reason to disagree.

Main Issue

- 4.3 Having regard for the Belgravia Neighbourhood Plan, the consultation responses and other evidence, my site visit, and the response from the Forum to my questions of 3 October 2023, I consider that there is one main issue relating to the Basic Conditions for this examination. That is whether the focus on Conserving and Enhancing the Heritage of Belgravia, Maintaining and Enhancing the "Village Feel", and Improving the Environment (sections 5, 6 and 7 of the Plan) is too restrictive, and in conflict with the strategic planning policies of the London Plan and Westminster City Plan, which seek significant new development to provide commercial-led and mixed use development alongside new homes, notably in the London Central Activities' Zone, and in the Victoria Opportunity Area.
- 4.4 My examination of the Plan addresses, in turn, each of the 11 sections which make up the Belgravia Neighbourhood Plan. My assessment of the main issue is embedded in my analysis of all these sections and policies. I also report on the other topics aside from the main issue, notably those raised by respondents to the Regulation 16 consultation exercise. My initial concerns about the Neighbourhood Plan were summarised in my letter to the Forum dated 3 October 2023, and I am grateful to the Forum for the response of 27 October 2023 which included a number of proposed modifications which I discuss and comment on in the following paragraphs.

Sections 1 & 2

- 4.5 Section 1 of the Neighbourhood Plan provides a helpful introduction for readers. The first bullet refers to "the long-term vision of Belgravia as a unique residential neighbourhood...". The last sentence acknowledges the "blend of commercial activities..... [which are] important contributors to life in Belgravia." Section 2 describes the Belgravia Neighbourhood Area and summarises its history with due reference to Victoria Rail and Victoria Coach Stations. It then explains the historic significance of Belgravia, as evidenced by the extent of conservation area coverage, and reports that community consultation confirms the importance of preserving or enhancing the fine built environment, with its "village feel".
- 4.6 Section 2, paragraph 2.3.4 identifies possible future major infrastructure developments which are likely to have an impact on Belgravia, in the Victoria Opportunity Area and relating to the construction of Crossrail 2. Grosvenor Estate expressed general concern about the tone of the

Neighbourhood Plan which, it considers, does not actively encourage growth in the Victoria Opportunity Area or CAZ, highlighting the references in 2.3.4 to (i) the likely detrimental impact of high-rise apartment blocks on Belgravia's skyline, and increased motor traffic in the Victoria Opportunity Area; and (ii) the prospect of work for up to 8 years to construct Crossrail 2, with subsequent disruption of a local school. This is perceived as out of line with the London Plan and Westminster's City Plan which actively support and encourage growth within the Opportunity Area. Paragraph 4.9 of Westminster's City Plan endorses Crossrail 2 and a modern transport interchange.

- 4.7 The Forum's response of 27 October 2023 to my queries on this point proposes modified wording to paragraph 2.3.4, to acknowledge the need for growth in the Victoria Opportunity Area and to refer to commercial or mixed use development, as well as apartment blocks. I support this modification and also consider that the wording in the paragraph should be modified further, to emphasise that some strategic growth is planned for Belgravia which is expected to yield substantial benefits. The Victoria Business Improvement District (VBID) was established in 2010, and it works with Westminster City Council and other partners to strengthen and support local and independent businesses through job creation and retention, and skills advancement. The Forum, in its response to my questions of 27 October 2023, accepted VBID's request for its area to be mapped, and cross-referenced in the text of the Plan. A new Figure 2.3, in my opinion, should be added to show the section of the VBID which is located within Belgravia, with text to explain its future role in the development of the area. I propose all the above modifications in **PM1**. They are needed so that the Plan will contribute to the achievement of sustainable development and will be in general conformity with the London Plan and Westminster City Plan.

Section 3

- 4.8 Section 3 sets out the Vision for Belgravia, explaining that it is based around the importance to the community of two fundamental features: Belgravia's architecture and heritage; and Belgravia being an oasis of calm with a village-like atmosphere, despite being in the centre of London. However, the Vision/core purpose of the Plan, as summarised in sub-section 3.1, seeks to allow "sustainable growth" as well as to protect the area's assets. Sub-section 3.2 describes four key pillars which stem from the Vision and underpin the Plan. Pillar D is "To influence the design and character of any key major development projects within the Belgravia Neighbourhood Area". I consider that the justification for Pillar D is too restrictive, and the wording should be modified to make clear that Grosvenor Place and Buckingham Palace Road, outside the Conservation Area, are within the designated CAZ and/or Victoria Opportunity Area. I agree with Grosvenor Estate that the aim to expand the area which is "recognisably Belgravia" is inconsistent with growth promotion in Grosvenor Place and Buckingham Palace Road. I support the Forum's proposed modification to sub-section 3.2 but consider that the reference

to expanding the area which is “recognisably Belgravia” should be removed. The justification should be modified as in **PM2** to achieve sustainable development and general conformity with the London Plan and Westminster City Plan.

Sections 4 & 5

- 4.9 Section 4 of the Neighbourhood Plan helpfully describes the current planning framework, highlighting the London Plan and Westminster Plan, both of which were adopted in 2021. The latter runs to 2040, as does the Belgravia Neighbourhood Plan, and their compatible timing should assist decision-making. Section 5 begins with an Introduction to Conserving and Enhancing the Heritage of Belgravia, and 5.2 describes Design Principles, explaining that the Forum has commissioned the production of a Belgravia Design Codes document from a leading firm of London architects. Section 12 of the NPPF states that good design is a key aspect of sustainable development; plans should set out a clear design vision and expectations; and neighbourhood planning groups can play an important role in identifying special qualities of each area and explaining how this should be reflected in development. I consider that the general approach of the Belgravia Neighbourhood Plan has regard to the approach in national policy to good design.
- 4.10 In response to the concern of Grosvenor Estate that Policy BEL1: Design Principles was too simplistic and could impose an unnecessary constraint on growth, the Forum proposed modifications to criteria A and B. I note that Westminster City Council and TTL Properties Limited also sought amendment to the wording of criterion B. These are set out in the response of 27 October 2023 to my queries, and I propose that Policy BEL1 should be modified to address them, as in **PM3**. I note that criterion C of Policy BEL1 aims to “encourage” compliance with the Belgravia Sustainability Charter, rather than “require”, so it need not be modified. Overall, with **PM3** to Policy BEL1 in place, growth, notably in the CAZ and Victoria Opportunity Area, should not be unduly constrained, and the Plan should contribute to the achievement of sustainable development. Paragraph 5.2.2 includes justification for Policy BEL1, referring to the Belgravia Conservation Area Audit. Grosvenor Estate pointed out that this is a draft document, not an adopted one, and is more than 10 years old. However, I agree with the Forum that, as the draft Audit relates to heritage, it is unlikely to have become out-of-date quickly, as do some evidential planning documents. The Forum advised that Westminster City Council had given significant weight to the document in some recent planning applications. I recommend change to clause C of paragraph 5.2.2 to state that development on the fringes of Belgravia should be cognisant of the surrounding townscape, in order to give reasonable flexibility, as in **PM3**. Section 5.12 of the Plan helpfully explains the status of the Audit, and Non-Policy action 8 advises that the Forum will seek to work with Westminster City Council to secure its adoption.

- 4.11 Sub-section 5.3 and Policy BEL2 relate to Mitigating the Effects of Climate Change. The Forum has proposed modifications to criteria A & B of Policy BEL2, and to the supporting text in paragraphs 5.3.1 and 5.3.2, and to the description of the Belgravia Sustainability Charter. It expressed support for an additional reference to “heritage sensitive glazing”. I support all these modifications, as in **PM4**, to contribute to the achievement of sustainable development and to respond to comments from a number of consultees, including Historic England and Knightsbridge Neighbourhood Forum. The VBID sought reference to the Sustainable City Charter launched by Westminster City Council, but the City Council has not sought reference to it in the Neighbourhood Plan or pointed to any areas of conflict. I consider that the Belgravia Sustainability Charter sets out principles which those proposing development or refurbishment should find helpful, and I support the revised wording (as in FI18, 32 & 33), including removal of the reference to the Belgravia Sustainability Charter from the Non-Policy Action 1, as this duplicates Policy BEL1C. **PM4** should be made accordingly to provide clarity for readers and users of the Plan and secure a positive approach to mitigating the effects of climate change in the interests of securing sustainable development.
- 4.12 Sub-section 5.4 describes three character areas, namely The Mews, Kinnerton Street and Barnabas Triangle. Policy BEL3 aims to protect them as “predominantly residential” areas but acknowledges that parts of Kinnerton Street and Barnabas Triangle are designated as Local Centres. I recommend that the title of Policy BEL3 is modified because, as written, it could imply that there are just three character areas across the whole Neighbourhood Plan Area, and that is misleading. Grosvenor Estate regarded the policy as too narrow in its scope for enhancement of the character of the area. Westminster City Council also proposed modifications to the policy to improve its legibility and remove the reference to developments outside the character areas. I support the modifications proposed by the Forum in response to the City Council in respect of clauses A, B and D. In addition, I agree that clause C should offer more flexibility over the retention or reinstatement of historical and/or architectural features, with addition of the word “including”. Policy BEL3 should be modified, as shown in **PM5**, for the achievement of sustainable development.
- 4.13 Sub-section 5.5 concerns Building Heights and begins with “Context: Why buildings substantially higher than their surroundings are not suitable in Belgravia”. Paragraph 5.5.1 quotes from the Westminster City Plan that “Westminster is not generally suitable for tall buildings”. Historic England argued that there was in-built tension between the Neighbourhood Plan and Westminster City Plan regarding tall buildings. Grosvenor Estate pointed out that the City Plan defines tall buildings as those which are twice the prevailing context height, which would allow for uplift above prevailing heights. As much of Belgravia is within Conservation Areas, where the existing character and appearance should be preserved or enhanced, I support the aim of the Neighbourhood Plan to limit the scope for new buildings which are taller than the existing ones. However, I

consider that the wording should be modified to acknowledge the presence of the CAZ and Victoria Opportunity Area where intensification for commercial growth is planned. I agree with the Forum's proposed modification so that section 5.5 should include a cross-reference to the City Plan's Policy 41: Building height and acknowledge that tall buildings may be acceptable within places such as the Victoria Opportunity Area, and in Housing Renewal Areas such as Ebury Bridge Estate (City Plan Policy 42). Transport for London argued that tall buildings within the Opportunity Area would also conform with London Plan Policy 9. I am satisfied that paragraph 5.5.1 on Page 35 should be modified to acknowledge that parts of Belgravia outside the Conservation Areas, and within the CAZ and Victoria Opportunity Area, could be the subject of major development proposals, which may mean taller buildings than are found in the centre of Belgravia.

- 4.14 I accept that the Forum's proposed modification to paragraph 5.5.1, in response to Grosvenor Estate, partly addresses this point but further modification is needed. The aim on Page 35 of the Plan to "increase" the size of the area which is "recognisably Belgravia" could prevent future sustainable development on the fringe of the area and should, in my opinion, be amended. In order to secure sustainable development and achieve general conformity with policy in the London Plan and Westminster City Plan, **PM6** should be made. Figure 5.5 provides a detailed map of the height of buildings throughout the area. Figure 5.6 shows a view across Belgravia from Peter Jones department store, Sloane Square. Although the store is outside the Neighbourhood Plan Area, the Forum observed that the viewpoint is available to the public and presents a wide view "of the iconic London skyline". I consider that Figure 5.6 is useful for readers and should be retained. I support Non-Policy Action 2, as early engagement with the City Council and developers, when or if tall buildings are being proposed, should enable potential detrimental effects to be addressed.
- 4.15 Sub-section 5.6: Refurbishment and Enlargement of Buildings clearly relates to an important issue. Paragraph 5.6.2 explains that in recent years there have been a number of projects to excavate basements, excavate under garden areas or under-pavement vaults, add upper floors or add rear extensions. The text draws attention to policy in the Westminster City Plan and refers applicants to the Belgravia Design Codes. I consider that readers should be alerted to the Codes, but these should be referred to as "principles" rather than "requirements". Policy BEL4 requires projects to minimise and mitigate their impact on neighbours and the wider community during construction. Non-Policy Actions 3 and 4 relate to monitoring decision-making and engagement with property owners and contractors. Knightsbridge Neighbourhood Forum proposed that Policy BEL4 should require construction to mitigate and minimise all air emissions, not just dust. The Forum proposed that Policy BEL4a be modified to secure this, which I support in order to achieve sustainable development, as in **PM7**.

- 4.16 Sub-section 5.7: Views and Vistas includes Figures 5.7 and 5.8 which map views of local importance in the Belgravia Conservation Area, as identified in the Conservation Area Audit, and some additional views of local importance – in and outside the Conservation Area. Policy BEL5 aims to protect these views, quoting Policy 40 of the Westminster City Plan. VBID questioned the case for the new additional views, arguing that details of methodology and selection criteria should be set out. I note that some of the views are narrow because of their proximity to existing buildings. However, I am satisfied that the evidence in Appendix C of the Plan provides adequate support for their selection, and I propose no changes.
- 4.17 Sub-section 5.8: Local Buildings of Merit includes Figure 5.9 which shows the significant number of Listed Building designations in Belgravia. Figure 5.10 shows Unlisted buildings of merit which were identified in the Belgravia Conservation Area Audit. Then, Figure 5.11 shows Additional local buildings of merit, which are outside the Belgravia Conservation Area, and are supported by evidence included in Appendix E of the Plan. Policy BEL6 identifies and seeks to protect these local buildings and structures of merit, and states that proposals affecting them should meet the requirements of City Plan Policy 39. Clause B1. of that policy aims to “ensure heritage assets and their settings are conserved and enhanced in a manner appropriate to their significance”. Clause L states that unlisted buildings which make a positive contribution to a conservation area will be conserved. Clause R states that a balanced judgment will be made regarding the scale of any harm or loss of non-designated heritage assets, and paragraph 39.27 confirms that protection can be given to non-designated assets. I consider that section 5.8 should acknowledge that there is a hierarchical system, whereby listed buildings have greater protection than unlisted buildings, and conservation areas offer more protection than non-designated areas. I consider that 5.8.1 should be modified as in **PM8** to avoid misunderstanding as to the level of protection given to unlisted buildings of merit, and to have regard to national planning policy. Also, the last sentence of paragraph 5.8.2 arguably introduces a new policy (that Lumley Flats should be treated as a listed building within a conservation area), and I recommend re-wording to clarify that this is an aim rather than a policy requirement. In addition, Figure 5.10 should be modified, as it incorrectly shows Victoria Coach Station as an unlisted building of merit. It is in fact a listed building.
- 4.18 Sub-section 5.9 concerns Shopfronts and 5.10 relates to New Monuments and Public Art. I consider that Policies BEL7 and BEL8 which provide guidance for developers on these matters are appropriate for Belgravia, with its extensive Conservation Area. Both policies expect proposals to “reflect” the Belgravia Design Codes, which I support. The Forum proposed minor re-wording of Policy BEL7 in response to Westminster City Council’s consultation response, and put forward a new clause B, to restrict advertising at street level or above, in response to Knightsbridge Neighbourhood Forum. **PM9** should be made, so that Policies BEL7 and 8 contribute to the achievement of sustainable development.

Section 6

- 4.19 Section 6 – Maintaining and Enhancing the “Village Feel” of Belgravia - explains what is meant by “village feel”, helpfully in my opinion. It advises that 96% of respondents to the quantitative consultation survey (residents and businesses) wished it to be maintained or enhanced. Housing is addressed in sub-section 6.2, and there is local support for a permanent residential community. The continued provision of social housing is welcomed by the Plan. Sub-section 6.3 and Figure 6.1 indicate the location of the CAZ and local centres within the Neighbourhood Plan Area, and it is stated that there are approximately 75 restaurants and cafes across Belgravia. Given Belgravia’s convenient location in Central London, the hospitality outlets clearly cater for visitors to the area as well as local residents and workers.
- 4.20 Policy BEL9 seeks to limit late night uses, including restaurants etc., outside the CAZ, local centres and secondary centres, in order to prevent impacts that would be detrimental to residential amenity. Grosvenor Estate argued that the policy should be reviewed in the light of Policy HC6 of the London Plan, which acknowledges the importance of the night-time economy, particularly in the CAZ. However, Policy BEL9 applies to locations in predominantly residential areas outside the CAZ. In response to Westminster City Council, the Forum proposed re-wording which would place the focus on late-night activities and add a reference to Figure 6.1 which shows the location of CAZ, local centres and secondary centres. I support this amendment and re-wording of the last line in clause B to manage, rather than encourage, alfresco dining. I also support the proposed modification to Figure 6.2 Ground floor uses so that the property at 37-39 Bloomfield Terrace is correctly shown as “residential”. **PM10** would secure these modifications, which should be made to ensure the policy is not overly restrictive of commercial activity and should contribute to sustainable development.
- 4.21 Sub-section 6.4 and Figure 6.3 indicate that private garden squares across Belgravia contribute to its special character. In response to comments from London Parks & Gardens, the Forum states that the Neighbourhood Plan cannot grant or limit public access, as the squares are in private hands. Non-Policy action 9 advises that the Forum will seek to work with landowners and other partners to manage any temporary events, which should provide reassurance for neighbouring residents.
- 4.22 Sub-section 6.5 Workspaces states that an estimated 17,000 people travelled to work in Belgravia every day, pre-pandemic (i.e. pre-2020). The range of workplaces is described briefly in the Plan, and support is expressed for the “worker members of the community”. The text refers to the growth of large floorplate workspace in recent years, including in the Victoria area of London, and cautions that in the predominantly residential areas of Belgravia, the substantial growth of workspaces is not considered appropriate. Policy BEL10: Small-scale workshops encourages their provision in the CAZ, and in local or secondary centres. Grosvenor Estate

pointed out that Belgravia is home to many major corporate headquarters and argued that there should be policy support for the growth and/or refurbishment of large office spaces within suitable areas. This would align with the strategic objectives for employment growth in the area. Grosvenor proposed modification to Policy BEL10, including for the creation of roof terraces, and the provision of carbon savings and enhanced biodiversity, as well as greater flexibility for commercial uses at ground level. VBID pointed out that small scale workspaces do not only exist on small sites, and there is a role for large-scale buildings to allow for businesses to start up and grow.

- 4.23 Based on these comments, and those from Westminster City Council, the Forum put forward modifications to Policy BEL10. These would continue to apply to small scale spaces but would enable additional office floorspace not simply incubator/start-up space and would include the Victoria Opportunity Area as a suitable location. Support will be provided for change of use at ground floor level for a range of commercial uses, and measures to achieve carbon savings and biodiversity. I consider that these modifications should enable the future provision of a variety of new and expanding workspaces in Belgravia, consistent with the encouragement of economic growth. Modifications to Policy BEL10 should be made as in **PM11** for the achievement of sustainable development, and for general conformity with the London Plan and Policies 13 & 14 of the Westminster City Plan.
- 4.24 Sub-section 6.6 expresses aims to preserve Belgravia's churches, many of which are listed, and 6.7 seeks to protect its historic pubs. The ambitions are in general conformity with Policies 17 and 16 of the City Plan, in my view, and I appreciate that the facilities contribute positively to the character of the area and to community wellbeing.

Section 7

- 4.25 Section 7 – Improving the environment of Belgravia begins with information concerning open space in sub-section 7.2, with Policy BEL11: Space for play and group social activities. The shortage of public open spaces is clearly described and helpful for readers and users of the Plan, in my opinion. London Parks & Gardens queried the reference to a possible children's play area in Ebury Square, but the Forum pointed out that that would be the responsibility of Grosvenor Estate. I am satisfied that paragraph 7.2.1 describes the current situation adequately and need not be amended.
- 4.26 Sub-section 7.3 and Policy BEL12 relate to Trees and Greening. As I saw at my site visit, trees are an important contributor to the character of Belgravia's streets and squares. Westminster City Council proposed several amendments to paragraph 7.3.1 of the Plan in order to emphasise the importance of trees, including London Plane Trees, to Belgravia, and to align more closely with Policy 34 of the City Plan. Detailed modifications to Policy BEL12 were put forward by Westminster City

Council, which were accepted by the Forum. These modifications should be made to safeguard and enhance trees in Belgravia and achieve sustainable development, as in **PM12**. As noted above in paragraph 4.21, I note the comments from London Parks & Gardens regarding public access to garden squares and a proposal for a play area in Ebury Square. The Forum has pointed out that it has no powers to grant public access to private squares, and proposed deletion of the reference to a possible play area on Page 76. This should be achieved by **PM12** to avoid confusion.

- 4.27 Sub-section 7.4 Streetscapes begins by stating that the appearance of Belgravia's streets and pavements is an important contributor to the overall look and character of the area. Transport for London (TfL) welcomed the references to its Streetscape Guidance and London Cycling Design Standards but was disappointed that a more positive approach to implementing Healthy Streets and encouraging active travel had not been pursued. I understand TfL's position, as sub-section 7.4 says very little about the benefits for pedestrians and cyclists of well-kept pavements and well-located cycle storage facilities. However, I am satisfied that Policy BEL13 should not discourage sustainable travel through Belgravia, and it should contribute positively to the appearance of the area. "Where appropriate" should be inserted into Policy BEL13A, as proposed by the City Council and included in **PM13**, so that the policy is not too restrictive and will contribute to sustainable development.
- 4.28 Sub-section 7.5 reports that traffic and associated noise and pollution were expressed as the strongest dislikes of living or working in Belgravia. The text explains that the Neighbourhood Plan Area is bounded by four designated primary routes, and Victoria Coach Station is the venue for many coaches. A number of aspirations to address traffic problems in the future are set out, along with Non-Policy Action 11, which I support.

Section 8

- 4.29 Section 8 Major Development Sites begins with references to "more Belgravia rather than less Belgravia" and the area which is "recognisably Belgravia." The text should also acknowledge that Belgravia includes areas of CAZ, and the Victoria Opportunity Area, where major development could be promoted. I consider that the opening paragraphs should be re-written, as in **PM14**, so that the section is more positive about future development and reflects the overall vision for the Plan more coherently. VBID suggested that the Future Victoria project and Project Swan should be referenced in section 8.1, but I accept the Forum's response that there is currently insufficient detailed information which could be referred to. Grosvenor Estate proposed amended wording to Policy BEL14, as did Westminster City Council, to give more flexibility and to make allowance for flood risk. Modifications should be made to Policy BEL14 as in **PM14**, so that major development to high design standards is possible, within appropriate parts of Belgravia, and so that the Basic Conditions for neighbourhood planning are met.

Section 9

- 4.30 Community Infrastructure Levy (CIL) funding is addressed in section 9. This section provides detailed information which should assist users of the Plan, including Westminster City Council, to achieve good supporting measures when major development occurs. The City Council expressed concerns about item 7, and in response the Forum proposed additional text, which I recommend in **PM15**, to refer to the City Council's Standard Details for Highways, soon to be revised to achieve low carbon schemes when improving paving. The modification should contribute to sustainable development.

Section 10

- 4.31 Section 10 Neighbourhood Management states that, once the Plan has been made, the Forum will work with the City Council to achieve its implementation. Helpfully, in my view, the Forum intends to work with the City Council on the planning and implementation of measures to achieve net zero targets. It is intended to create a Neighbourhood Representation Panel comprising residents from each of the 15 zones within Belgravia, who will meet regularly, discuss local issues and report to the existing Steering Group. Grosvenor Estate argued that the zones should be represented by businesses as well as residents, and I agree that this would be necessary to reflect the mix of land uses across Belgravia and give a balanced view on key issues. Sub-section 10.1 should be modified, as in **PM16**, for the achievement of sustainable development.

Section 11

- 4.32 Section 11 indicates that the Forum intends to monitor and review the Neighbourhood Plan on a regular and ongoing basis. I appreciate the Forum's commitment to this approach which is consistent with good planning, and I propose no changes to Section 11 of the Plan.

Glossary

- 4.33 In addition, the Glossary should include a definition of "periphery", with cross-reference to Figures 2.2, 5.1, 5.5 & 6.2, so that readers and users of the Plan understand the intended location. To meet the Basic Conditions, this modification should be made as in **PM17**.

Design Codes

- 4.34 Design Codes are addressed in Appendix A, which begins with a cross-reference to the full Belgravia Design Codes document. I am satisfied that Appendix A sets out the principles for future development rather than the detail, and note that paragraph 5.2.1 makes this clear. I propose no modifications to the full document, which is an evidence item and separate from the Neighbourhood Plan. However, I note that the full document includes section 2.13 Design on Peripheral Sites, and the

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summary in Appendix A of the Neighbourhood Plan omits to mention it. The full document accepts that development proposals at the periphery of Belgravia should not have to be informed by historic precedent as in the historic core of the Area. As the Victoria Opportunity Area is expected to experience significant growth in jobs and homes, I consider that Appendix A should be modified, with additional text as in **PM18**, so that it is not overly restrictive and is in general conformity with strategic planning policy. Westminster City Council proposed revised wording to design principles 1.4, 8.4 and 10.4 which I support. I shall not comment on the precise content of the Belgravia Design Codes document, and its Section 2.10, which is referenced in FI55⁷, as this is an evidential document. **PM18** is necessary to give more flexibility to developers, and secure general conformity with Westminster City Plan, and should be made.

Other Issues

- 4.35 Liam Hennessey presented a plan for Hyde Park Corner, to change the traffic arrangements giving better access for pedestrians and to create a peninsula in front of Apsley House. Also, regarding traffic and transport, Westminster Cycling Campaign commented on section 7.5 of the Neighbourhood Plan, noting that Non-Policy Action 11 aims to explore the potential for the implementation of a traffic reduction scheme for the entire Neighbourhood Area. Evidence of sustainable outcomes from Low Traffic Neighbourhood schemes across London were described. The Forum responded that the subject of highways and traffic at Hyde Park Corner was outside the scope of the Neighbourhood Plan, and considerable traffic evaluation and local consultation would be required before a Low Traffic Neighbourhood scheme could be considered. I agree that the Neighbourhood Plan need not be amended in response to these points.
- 4.36 London Parks and Gardens advised that it is affiliated to The Gardens Trust and recommended that the Trust be consulted on any proposals for Hyde Park Corner. The Forum noted this request, but I consider there is no need to modify the Neighbourhood Plan on this point. Josephine Ohene-Djan questioned whether sufficient attention had been given to the needs of people with disabilities/the elderly/infirm members of society. The Forum stated that, whilst no disabled communities were specifically identified, a number of members of its Steering Group had limited mobility or sight, due to their age, and so recognised the challenges of movement and transport around Belgravia. The Forum offered to modify the Design Codes document to recognise the needs of accessibility for all. However, I make no comment on this as it relates to an evidential document. I am satisfied that the policies and content of the submitted Neighbourhood Plan do not discriminate against the needs of people with disabilities and recommend no modifications.

⁷ See paragraph 4.37 below.

- 4.37 As an advisory comment, when the Plan is being redrafted to take account of the recommended modifications in this report, it should be re-checked for any typographical errors and any other consequential changes, etc. Minor amendments to the text and numbering (sections, paragraphs etc.) can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates (including, for example, FI55) in agreement between the Forum and Westminster City Council.⁸

5. Conclusions

Summary

- 5.1 The Belgravia Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it. I began by investigating the main issue; whether the focus on Conserving and Enhancing the Heritage of Belgravia, Maintaining and Enhancing the “Village Feel”, and Improving the Environment (sections 5,6 and 7 of the Plan) is too restrictive, and in conflict with the strategic planning policies of the London Plan and Westminster City Plan, which seek significant new development to provide commercial-led and mixed use development alongside new homes, notably in the London Central Activities’ Zone (CAZ), and in the Victoria Opportunity Area. My conclusion is that, as long as the modifications which I propose and have detailed in Appendix 1 are made, an appropriate balance between the two aims of conservation and growth will be achieved, and the Basic Conditions for neighbourhood planning and legal requirements should be met. Also, I have taken account of all the other issues raised in respect of the Neighbourhood Plan and have concluded that no additional modifications are needed. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.2 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Belgravia Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

⁸ PPG Reference ID: 41-106-20190509.

Overview

5.3 I appreciate the considerable amount of work which has taken place, over many years since 2014, to set up the Neighbourhood Forum, with its Steering Group, and to produce the Neighbourhood Plan. Located within the centre of London, where a wide variety of land uses of local, citywide, national and international significance are located, the Forum has had to research and investigate a range of diverse sectors with quite different economic, social and environmental purposes. Belgravia Estate, an exemplar of late Georgian town planning, and an area where heritage is very important, sits close to Victoria Railway and Coach Stations where the Opportunity Area envisages commercial and mixed use growth over the plan period. The Forum has had to work diligently to produce a Plan which will reconcile these two, potentially conflicting, forces, to the satisfaction of its local residents and business interests. I commend the Forum for producing an integrated Neighbourhood Plan, which should shape the future of Belgravia in a beneficial way to the local community, as well as the City of Westminster and Central London.

Jill Kingaby

Examiner

Appendix 1: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages 13 - 15	<p>2.3.4 Future developments/issues</p> <p>Modify the second paragraph to read:</p> <p>Together these have played a significant part in preserving the historic character which we still see today. Nevertheless, it is recognised that the area faces challenges...exacerbate the challenges.</p> <p>Over the next 17 years, the London Plan and Westminster City Plan expect areas on the fringe of Belgravia, notably along Grosvenor Place and Buckingham Palace Road, which lie within the Central Activities Zone (CAZ) and Victoria Opportunity Area, to deliver growth. Westminster’s spatial strategy envisages that growth will primarily be delivered through the intensification of the CAZ area, and continued major mixed-use redevelopment in identified Opportunity Areas, to achieve London Plan growth targets for new jobs and homes. Accommodating future growth on the periphery of Belgravia in a manner which does not damage its historic character and appearance will present a challenge over the coming years.</p> <p>Currently there are....</p> <p>On Page 14, modify the text as proposed in the Forum’s item 1 (FI1), in the response to Regulation 16 Representations.</p> <p>Page 15, modify as follows:</p> <p>Thus whilst, in many respects.... infrastructure development. Whilst acknowledging the benefits which</p>

		<p>such economic growth will bring, †this Plan sets out to ensure</p> <p>At the end of Page 15, add:</p> <p>Figure 2.3 shows the Victoria Business Improvement District (VBID) where major employers and small businesses are working together with Westminster City Council and other partners to support business growth and enhance the environment.</p> <p>Add a new Figure 2.3 to show the extent of the VBID within the Belgravia Neighbourhood Plan Area.</p>
PM2	Page 17	<p>3.2 Pillars of the Neighbourhood Plan</p> <p>D. To influence the design and character of any major development projects within the Belgravia Neighbourhood Area</p> <p>Justification: The core of.....outside the Conservation Area, and within the CAZ or Victoria Opportunity Area. It is the objective..... "recognisably Belgravia" is extendedretained rather than reduced.....</p> <p>Modify Section 3.2, with the addition of a new paragraph D, as in FI4.</p>
PM3	Page 22	<p>Policy BEL1: Design Principles</p> <p>Modify the policy as in FI16, FI30, and modify Clause C in paragraph 5.2.2 as in FI4.</p>
PM4	Pages 23 - 26	<p>5.3 Mitigating the Effects of Climate Change</p> <p>Modify 5.3.1 as in FI31.</p> <p>Policy BEL2: Retrofitting Historic Buildings for Energy Efficiency</p> <p>5.3.2 and Belgravia Sustainability Charter</p> <p>Non-Policy Action 1: Mitigating Climate Change</p>

		Modify as in FI17, FI18, FI31, FI32, FI33, FI77 & FI87.
PM5	Pages 27 - 32	5.4 Character Areas – Mews, Kinnerton Street and Barnabas Triangle Policy BEL3: Belgravia's Character Areas <i>The Mews, Kinnerton Street and Barnabas Triangle</i> Modify as in FI19 & 34.
PM6	Pages 33 - 35	5.5.1 Context: Why buildings substantially higher than their surroundings are not suitable in Belgravia Modify 1 st paragraph on Page 33: The Westminster City Plan states unequivocally ... we would go further to say that tall buildings are <i>especially</i> not suitable for <i>much of</i> the Belgravia Neighbourhood Area. Modify last sentence on Page 34: Whilst there are relatively large..... to determine context heights <i>over a wider area.</i> Modify 1 st paragraph on Page 35: Figure 5.6 below shows..... It is important <i>desirable</i> that this bowl is neither constricted further Modify 2 nd paragraph on Page 35 as in FI4.
PM7	Pages 36 - 42	5.6: Refurbishment and Enlargement of Buildings 2 nd paragraph on Page 38 – modify as follows: Thus, applications that seek building enlargement must first and foremost <i>should</i> demonstrate that the requirements of <i>principles in</i> the Belgravia Design Codes

		<p>Policy BEL4: Building Refurbishments and Enlargements</p> <p>Modify as in FI35 & FI89.</p>
PM8	Pages 47 - 53	<p>5.8 Local Buildings of Merit</p> <p>Add new sentences at the start of 5.8.1:</p> <p><i>The National Planning Policy Framework advises that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites. Conservation Areas and Listed Buildings are of high importance and should be conserved appropriately.</i></p> <p>A great many buildings.....</p> <p>The Belgravia Conservation Audit 2013 identified a number of buildings as being unlisted buildings of merit. These are shown in Figure 5.10 and listed in Appendix D. <i>These are ranked below the designated listed buildings, but</i> This Plan endorses the selection.....</p> <p>5.8.2 Delete the last sentence - As with Coleshill Flats,... Belgravia Conservation Area.</p> <p>Figure 5.10 should be modified to delete Victoria Coach Station.</p>
PM9	Pages 53 & 54	<p>Policy BEL7: Shopfronts</p> <p>Modify the policy as in FI36 & 90.</p>
PM10	Pages 68 & 69	<p>Policy BEL9: Late Night Uses in the Neighbourhood Area</p> <p>Modify the policy as in FI37 & 91.</p> <p>Figure 6.2 Ground Floor Uses in Belgravia</p> <p>Modify the map as in FI93.</p>
PM11	Page 72	<p>Policy BEL10: Small-scale Workspaces</p> <p>Modify the policy as in FI23 & 38.</p>

PM12	Page 79 - 83	<p>7.3 Trees and Greening</p> <p>Modify the wording as in FI39,40,41,42, 43, & FI76.</p> <p>Policy BEL12: Trees and Greening</p> <p>Modify the policy as in FI44,45,46,47 & 48.</p>
PM13	Pages 84 & 85	<p>Policy BEL13: Streetscapes</p> <p>Modify the policy as in FI49.</p>
PM14	Pages 87 - 90	<p>8: Major Development Sites</p> <p>8.1.1 It is a key objective contributes to 'more Belgravia rather than less Belgravia' Belgravia's <i>fine built environment, distinctive architecture and heritage.</i> In other words.....the Neighbourhood Area.</p> <p>Policy BEL14: Major Development Sites</p> <p>Modify the policy as in FI24, 50 & 51.</p>
PM15	Pages 91 & 92	<p>9: Neighbourhood Infrastructure Priorities for Neighbourhood CIL Funds</p> <p>Modify as in FI52.</p>
PM16	Pages 93 & 94	<p>10: Neighbourhood Management</p> <p>Third paragraph – The Belgravia Neighbourhood Area will be divided.... small enough to ensure that <i>the residents and business workers</i> within them.....</p> <p>c) Encourage local residents <i>and business representatives who work in Belgravia</i> to join the community liaison.....</p> <p>Zone representatives are residents <i>or workers</i> within the Zone they are covering.....</p>

PM17	Pages 96 - 97	<p>Glossary</p> <p>Add a new item Periphery, with the following description: Belgravia sits in the heart of London with change expected on its periphery. Figure 2.2 of the Neighbourhood Plan shows the Victoria Opportunity Area, covering part of Belgravia on its south-eastern boundary. Figure 5.5 indicates that the tallest buildings within Belgravia exist along the southern, eastern and northern edges of the Neighbourhood Area. Figure 6.2 indicates the presence of commercial uses, especially along the edges of the Area, which contrast with Belgravia’s residential core. Figure 5.1 shows that most of Belgravia, except for areas along its eastern and southern edges, are designated conservation areas. “Periphery” is used to describe the edges of the Neighbourhood Area which differ in terms of land use and character and appearance from the core of Belgravia.</p>
PM18	Pages 98 - 102	<p>Appendix A: Design Codes</p> <p>On Page 101 insert a new sub-section as follows:</p> <p>Peripheral Sites – Design principles</p> <p>13.1 Belgravia sits in the heart of London with change expected on its periphery. Victoria Opportunity Area covers part of the Neighbourhood Area on its south-eastern boundary adjacent to Buckingham Palace Road.</p> <p>13.2 Development proposals for parts of the Opportunity Area should strike a balance between the needs of development and change, and recognition of their proximity to the core of Belgravia.</p> <p>13.3 Development proposals on the periphery will not be required to place</p>

		<p><i>such great reliance on conformity with historic precedent as proposals for sites within the historic core of Belgravia.</i></p> <p>Appendix A should be modified as in FI53, 54 & 56.</p>
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Appendix 2: Belgravia Neighbourhood Forum Response to the Regulation 16 representations