



**BELGRAVIA NEIGHBOURHOOD PLAN 2023-2040**

**Consultation Statement**

**SUMMARY OF ENGAGEMENT ACTIVITIES**

**May 2023**

**INTRODUCTION**

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Belgravia Neighbourhood Plan.

The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

**1. OVERVIEW**

Key consultation events and activities in the development of the Belgravia Neighbourhood Plan are as shown in summary below.

| <b>Timetable</b> | <b>Brief Description of Activities</b>  |
|------------------|---|
| March 2014       | Designation of the Belgravia Neighbourhood Area by WCC  |
| October 2014     | Designation of the Belgravia Neighbourhood Forum by WCC   |
| June 2016        | <b>Public Drop-in Events.</b><br>Open to the public drop-in events on 7 <sup>th</sup> and 13-16 <sup>th</sup> June 2016. Events co-ordinated by Tibbalds. This was an initial exploration of the community's likes and dislikes of the area. Public feedback was qualitative in nature with participants invited to give their comment via Post-It stickers on boards |
| November 2016    | <b>First Open Meeting</b>   |

| <b>Timetable</b>    | <b>Brief Description of Activities</b>   |
|---------------------|--|
|                     | A follow up open day on 5 <sup>th</sup> October to present key findings of the June consultation.  |
| May 2018            | <b>Neighbourhood Survey.</b><br>Quantitative paper-based questionnaire survey conducted to provide robust statistical validation of earlier qualitative findings. 2,300 questionnaires distributed. 311 (13%) questionnaires returned. |
| November 2018       | <b>Second Open meeting.</b><br>Open meeting at St Peter's School on 30 <sup>th</sup> November, approx. 60 attendees. Presentation of findings of quantitative survey.  |
| March 2019          | <b>Business consultation</b><br>Two focus groups with local business people, held at Berkeley Hotel.   |
| January 2020        | Re-designation of the Belgravia Neighbourhood Forum by WCC for a further five years.   |
| May 2020            | <b>Follow up survey</b><br>Online survey regarding 'Village Feel'. 105 respondents.  |
| December 2020       | <b>Third Open meeting, via zoom</b><br>Notification and link sent to 372 members / survey respondents, 183 opened the email. 30 attended.  |
| January 2022        | <b>Key stakeholder consultation – policy outline.</b><br>Plan outline and policy presentation. Presentation published in website and links mailed out to 370 members / former survey responders and other key stakeholders.            |
| January 2022        | <b>Key stakeholder consultation – full plan</b><br>Full Draft Plan sent to selected local stakeholders who were invited to respond.  |
| July-September 2022 | <b>Reg 14 consultation</b><br>Responses to the consultation were received and carefully considered. The Plan was amended as appropriate and as detailed in the schedule attached in the Appendix to this Consultation Statement.       |

## **2. DESCRIPTION OF KEY CONSULTATION ACTIVITIES**

### **Background of the Forum**

Following the Forum's designation in 2014 an Interim Working Group was formed to discuss and organise the constitution and business of the Forum. This group was replaced by a formally elected Steering Group in September 2015 – many of whom had been on the Interim Working Group. Members were then recruited by a variety of means: invitations to the existing members of amenity societies (Belgravia Residents Association and Belgravia Society), door-to-door calling and leaflet drops at both homes and businesses, advertising on the Forum's website, and word-of-mouth by Interim Working Group members. Business and community members were invited via traders' associations (Motcomb Street, Elizabeth Street and Pimlico Road). As at September 2015 there were 88 registered members (The current membership stands at over 250 registered, with approximately 150 of these active, i.e. opening every email communication.)

## 2.1 Public Drop-in events

Public consultation with respect to residents and other members of the local community commenced with a series of drop in events to get an initial understanding of the issues which most concerned the community.

A PR company, Tibbalds, was contracted to undertake this stage, paid for by Grosvenor Estates (the major landowner in the Neighbourhood Area). The first event was held on 7<sup>th</sup> June 2016 – attended by 30 people. The second series of events was held in a vacant shop in Elizabeth Street between 13<sup>th</sup> and 16<sup>th</sup> June. 175 people visited across the various days. Visitors were encouraged to use Post-It notes to indicate what they liked and disliked about Belgravia, and how it might be changed for the better.

The event was promoted by mailings to the membership and to the general public through posters in the window of the drop-in location.

An analysis of the key outcomes showed that comments could be grouped into four key themes:

- “Making Green Space accessible to all”
- “Enhancing the Vitality of Local Centres”
- “Making Belgravia a more accessible place for all”
- “Enhancing the character and quality of Belgravia”

[Click here for Tibbalds Initial Consultation Report.](#)

## 2.2 First Open Meeting

The findings of the Public Drop in events were presented to a public meeting on October 5<sup>th</sup> 2016 and views sought on the emerging themes.

The consultation exercise was advertised on-line on the website ([www.thebelgraviaforum.org](http://www.thebelgraviaforum.org)), through social media and by word-of-mouth invitation to people living and working in the area. The exhibition boards were also displayed on the website of the Belgravia Forum.

Around 100 people attended, who were invited to show agreement/disagreement to the themes identified in the first round of consultation. Around 90% of those attending expressed themselves in agreement with the themes. Disagreement was expressed in respect of:

- Promote and encourage the creation of more parklets in Belgravia 5 persons disagreed
- Provide opportunities for a greater amount of ‘street activity’ in Belgravia, e.g. markets and events, including making greater use of the squares 11 persons disagreed
- Improve the provision of community-focused facilities, such as community venues and training centres 11 persons disagreed

[Click here for Tibbalds Second Consultation Report](#)

## 2.3 Neighbourhood Survey

Following a change in Steering Group composition there was a hiatus in progress during 2017. In early 2018 work restarted on developing the Plan, at which point it was concluded that the early consultation work had been informative but insufficient to enable progress to be made in that it was

very qualitative in nature and had largely focused on themes that are not directly within the remit of a neighbourhood plan (e.g. traffic flows, tenant choice in retail areas) and not on issues which might affect the planning framework. All subsequent consultation work was thereafter undertaken by Belgravia Neighbourhood Forum rather than external consultants. Members of the Steering Group took charge of the consultation programme, working with local volunteers with relevant professional/consulting expertise, who were able to work 'pro bono'. This was done to save costs and to ensure better insight into the outcomes.

A major quantitative survey was thus launched in order to provide more robust data, with a larger sample base and more detailed questions. The themes of the initial consultation were used as the start point, but considerably expanded.

The questionnaire was designed and the survey managed and analysed by a local resident / volunteer with extensive professional market research and consulting experience. [Click here to see the Questionnaire.](#)

2,000 questionnaires (comprising 60 questions, both open and closed) were delivered by hand to homes in the area representing approximately half of residential addresses in the Area. The area was divided into 10 sub areas, and questionnaires and quotas were set to ensure delivery in each sub area, thus ensuring a full geographical coverage of the Forum Area. Premises that appeared to be unoccupied were not included in the deliveries. Additionally, a further 300 questionnaires were delivered to shops and offices in the Belgravia area and were posted to key community institutions, eg schools and churches.

311 (13% response) questionnaires were returned and processed.

Whilst not achieving universal coverage of the Area's residents and businesses, the benefit of the quantitative survey was to **give weight** to the views expressed qualitatively, i.e. to see broadly what proportion of the community held these views.

The results were fully analysed and tabulated (full tables available on request) and the key headlines summarised in a presentation ([Click here: Consultation Survey 2018 – Initial Results](#)). The issues which the survey responders most strongly endorsed, i.e. at least 75% strongly agreeing, were:

- Maintain and enhance the village feel of the area
- New building heights not to exceed the height of existing buildings
- Design developments to minimise the risk of anti-social behaviour
- Existing buildings and structures should be preserved wherever possible

## **2.4 Second Open Meeting**

The Second Open Meeting was held at St Peter's School, Lower Belgrave Street on 30<sup>th</sup> November 2018.

There were 63 attendees. These comprised members of the Steering Group, Forum members, together with a number of the general public (residents, workers, and representatives from Grosvenor Estate).

To publicise this meeting emails had been sent to the 252 Forum Members on the database at the time, together with 132 of those who had replied to the Consultation Survey and had given their email addresses and permission to recontact (survey responders). A total of 235 opened the emails.

Additionally, some 2,000 leaflets were distributed in the area in the preceding 10 days to invite other local residents and workers. (NB It was considered that 2,000 would be sufficient to inform a wide spectrum of local residents of the meeting. Previous experience with the delivery of questionnaires had shown that many addresses were unoccupied or inaccessible, being in apartment blocks.) [Click here to see the publicity leaflet for the 2018 Open Meeting.](#)

All nine ward councillors were invited to attend. Cllr Elizabeth Hitchcock\* (Knightsbridge & Belgravia) and Cllr Murad Gassanly (Churchill) attended. Other councillors sent their apologies.

A presentation of the key results of the survey was given. ([Click here for the 2018 Open Meeting Presentation](#))

Following a brief discussion, which focussed mostly on issues of clarification, the meeting endorsed the findings of the survey by a show of hands. There were no objectors.

\* NB Thereafter Cllr Hitchcock has been invited to, and has attended almost all, Steering Group meetings.

## **2.5 Business Consultation**

Of the respondents to the Consultation Survey, 73 out of 311 were business owners or employers. However, of these, 38 were also residents of Belgravia, resulting in fairly similar responses from residents and businesses. In order to ensure that the views of local businesspeople had been adequately considered, two focus groups (of 1 ½ hours duration) were held on 26<sup>th</sup> March 2019.

These groups comprised 14 local business people:

- 5 shop/business owners
- 3 retail shop employees
- 4 office workers
- 1 school principal
- 1 GP

In the event, these groups were found to have very similar views as residents, but with particular emphasis on:

- Improving amenities such as pavements, green spaces and waste removal
- Preserving the character of Belgravia
- Creating more affordable workspaces
- Encourage more affordable housing

## **2.6 'Village Feel' Survey**

All consultation stages strongly featured the importance of what residents and businesses described as the 'village feel' of Belgravia. However, as the Plan began to take shape it was clear that this term was too vague and undefined to serve a useful purpose. It was necessary to understand what the community meant by the term 'village feel'.

Hence, in May 2020 an online survey to probe this matter was designed using Survey Monkey. This was sent to members (252), previous survey responders (132) and posted on the website. A total of 105 responses was received, representing nearly one third of those contacted.

This survey demonstrated that the key components of 'village feel' are the following features:

- a. Safe to walk around day or night
- b. Services such as doctor, dentist, pharmacy, hairdresser, dry cleaner right on your doorstep
- c. Local shops which are useful and affordable
- d. Shops which are mostly small independents rather than national chains
- e. Houses, shops and streets are clean and well-maintained
- f. Quiet and peaceful at night

[Click here for the Village Feel Survey Results](#)

As far they relate to planning issues, these criteria have been given consideration in the further development of the Plan.

## **2.7 Third Open Meeting**

The first year of the Covid Pandemic put some constraints on Forum activity, but good progress was made on shaping the outline of the Plan. Thus, by the end of 2020, an Open Meeting of members and the community was called to present and consult on the emerging key objectives around which the Plan was going to be built.

It had been hoped to have a physical meeting, but Covid sensitivities meant that this meeting was instead held via Zoom on 14<sup>th</sup> December 2020.

The meeting was also advertised on the website and 2,000 leaflets delivered to homes and businesses. [Click here to see the leaflet](#). Notification of the meeting was sent to 372 members and survey responders. 183 opened the email and 30 attended the meeting via Zoom.

The presentation set out four key objectives for the Plan:

- a. To preserve the historical, cultural and architectural heritage of Belgravia
- b. To maintain and enhance the 'village feel' of Belgravia
- c. To improve the environment of Belgravia and mitigate the impacts of construction work
- d. To influence the development of key major sites within and adjoining the Forum Area

The presentation also set out 15 potential policies and 13 non-policy actions under these headings.

[Click here to see the presentation](#) Open Meeting December 2020

The meeting fully supported the outlined Plan objectives and policy directions and unanimously voted to proceed to develop these into a full draft plan. There were no objectors.

The presentation was also posted to the website for public access.

## **2.8 Key Stakeholder Consultation – January 2022**

During 2021 the Plan was developed from an outline concept, as presented at the 14<sup>th</sup> December 2020 Open Meeting, into a fully drafted plan with detailed policies and non-policy actions.

This draft was shared with Westminster City Council (WCC) for comment in August 2021 and a number of very helpful comments and directional suggestions received. These were incorporated into the draft Plan.

Finally, as a precursor to the Regulation 14 consultation, it was decided to run the policies (and for a small number of selected parties, the full draft) past key stakeholders in January 2022. These included all members of the Steering Group, 370 members / former survey responders, the two local residents' amenity societies, the five churches, the three local traders' associations (representing Motcomb Street, Elizabeth Street and Pimlico Road), Grosvenor Estates (as the major landowner in the area), together with selected residents who had expressed particular interest in the past.

The [Outline Presentation of Policies and Actions may be seen here](#).

A number of comments were received and incorporated into the Regulation 14 consultation draft as appropriate. The most significant of these was a request that the community role of the five churches be recognised. This was noted and relevant amendments made to the draft plan.

In addition, a face-to-face meeting was held in June 2022 with representatives of Grosvenor Estates, together with their advisers, during which they highlighted some concerns and issues, which principally related to the periphery of the Area. Wherever possible these comments were taken account of and changes made prior to finalisation of the Regulation 14 draft.

## **2.8 Engaging with hard-to-reach groups**

Throughout the process, the Steering Group was aware that, in a densely populated urban area such as Belgravia, there was the potential for engagement to fail to reach certain groups. Where information was available, the Steering Group reviewed the profile of those giving feedback to the main sources of engagement (the Open Meetings and survey) to ascertain whether there were any particular sections of the community that were being under-represented. However, it was felt that this was not the case and that a reasonable cross-section of the community had given their views.

## **2.9 Regulation 14 Consultation**

The Regulation 14 consultation was launched on 4<sup>th</sup> July 2022 and closed on 2<sup>nd</sup> September 2022 – a consultation period of 8 weeks and 4 days.

The full draft plan, together with the accompanying Design Codes and other supporting evidence documents, was made available on the Forum's website and in hard copy in two locations in Belgravia (the Berkeley Hotel and the Victoria Library). The Regulation 14 consultation documents, including the [Draft Plan and the Design Codes may be seen here](#).

Emails and/or letters were sent to the following statutory and non-statutory consultees, advising them of the Regulation 14 process and providing links to the Plan.

### Statutory bodies

- Westminster City Council
- BT
- Coal Authority
- Environment Agency
- Historic England
- Homes England
- Local Health Authority
- Mayor of London

- National Grid
- National Highways
- Natural England
- Network Rail
- RBKC
- TfL
- Thames Water
- UK Power Networks

Non Statutory bodies - representing key local interests (landowners, residents and traders associations, community institutions, major businesses, neighbouring forums)

- Peabody Trust Housing Association
- Grosvenor Estates
- Eaton Square Residents Association
- Belgravia Residents Association
- Belgravia Society
- Pimlico Road Traders Association
- Belgravia Traders Association
- Motcomb Street Traders Association
- St Paul's Wilton Place
- St Peter's Eaton Square
- St Michael's, Chester Square
- St Mary's, Bourne Street
- St Barnabas, Pimlico Road
- Cllr Rachael Robathan
- Cllr Tony Devenish
- Cllr Elizabeth Hitchcock
- Nickie Aiken MP
- Pimlico Neighbourhood Forum
- Knightsbridge Neighbourhood Forum
- Victoria Neighbourhood Forum
- Westminster Property Association
- Victoria BID
- St Peter's Church School
- St Barnabas Church School
- Pierre Brahm (Henry & James)
- Berkeley Hotel
- Cleveland Clinic
- Peninsula Hotel

The consultation was additionally publicised in the following ways:

- Update on the Forum's website
- Emails sent to the mailing list of 370 members and previous survey responders. First email sent 4<sup>th</sup> July 2022. Follow up reminder email sent 16<sup>th</sup> August
- Notification posted on social media (Facebook and Twitter)

- 4,000 leaflets distributed to homes, businesses, shops and other public places (eg GP surgeries)
- Double page advertisement / editorial placed in local free newspaper, the Belgravia & Pimlico Eye, with a claimed circulation of 10,000

A number of detailed representations were received, particularly from the statutory consultees. These have all been carefully considered and the response to each is detailed in the Appendix to this Consultation Statement.

### **3.0 EU OBLIGATIONS**

In January 2023, Belgravia Neighbourhood Forum formally requested that WCC carry out a screening opinion on the need for a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) of the draft Neighbourhood Plan (this was on the draft Regulation 15 version).

In March 2023 WCC prepared a draft report which concluded that, in its opinion, the draft Neighbourhood Plan was not likely to have significant effects on the environment or on protected habitats. It then issued this draft report to the statutory bodies – the SEA to the Environment Agency, Historic England and Natural England and the HRA to Natural England. All of the above bodies agreed with WCC's opinion. The draft report was then finalised in April 2023. This document is available as part of the documents submitted at Regulation 15.

**APPENDIX – Schedule of Regulation 14 Consultation Representations and Actions**

| Name of body/<br>'Resident' | Representation  | Response by Belgravia NF  | Amendment to<br>Reg 14 Draft Plan              |
|-----------------------------|---|---|--|
| Westminster City Council    | The introductory sections, particularly on Belgravia's history, though well written with a clear narrative, is quite lengthy, and could benefit from some editing so its helpful context is not skipped over by plan readers.   | Agreed although it does establish the context for some of the important principles, e.g. 'recognisably Belgravia'.        | Various  |
| Westminster City Council    | Throughout the document, where Design Codes are referenced, it should be made clear that this means what is included in Appendix A of the plan, and not therefore, other Design Codes that have not yet been written or consulted on.   | Noted although paragraph 5.2.1 makes clear that we mean the Belgravia Design Codes and these are presented in Appendix A. | Various  |
| Westminster City Council    | 2.3 'Belgravia Today'. This section has a lot of valuable information and evidence which sets a good bedrock for the vision and objectives which follow, notably on demographics and consultation survey data, which can become a little 'lost' due to the length of this section. We therefore suggest that this section could have sub-headings to aid readers and highlight some of the key areas of information within the section, for example ' <i>Consultation Responses</i> ', ' <i>Belgravia's Current Demographics</i> ', ' <i>Future Developments/ Issues</i> '. | Noted   | Various  |
| Westminster City Council    | BEL1 B. Reference to the Belgravia Design Codes should be clear it means 'as shown in Appendix A.'  | Agreed  | Amend BEL1 B                                   |
| Westminster City Council    | BEL2 B. We suggest this clause is expanded to note what would have a detrimental effect, such as in terms of noise, servicing, odours   | Agreed  | Amend BEL2 B                                   |
| Westminster City Council    | BEL2 C. It would be useful if this could be expanded to explain how the aims of the clause could be achieved, for example by adding 'through retaining or reinstating historical or architectural features'   | Agreed  | Amend BEL2 C                                   |
| Westminster City Council    | BEL2 D. As currently worded the clause is a little unclear and could be refined, either to note that development must be of a scale and massing that responds to and preserves the setting of the character areas, or that 'new developments must not adversely affect the setting of these character areas'.   | Agreed  | Amend BEL2 D                                   |
| Westminster City Council    | Our understanding is that Clause D would be seeking to ensure that new development within the setting of the smaller scale, low-rise urban grain of the character areas would not 'dwarf' these areas. A further paragraph within the justification could be useful to aid clarification of the intention of the clause .   | Agreed  | Add further supporting text to explain BEL2 D. |

| Name of body/<br>'Resident' | Representation  | Response by Belgravia NF | Amendment to<br>Reg 14 Draft Plan                 |
|-----------------------------|---|--------------------------|---|
| Westminster City Council    | 5.5.1 At the end of the paragraph when noting planning permission is not often required for internal refurbishments, it could be noted that although planning permission may not be required, listed building consent may be for listed buildings.  | Agreed                   | Add further explanatory text to 5.5.1.            |
| Westminster City Council    | 5.5.3 Last sentence on p.34, typo 'planning permission'   | Noted                    | Amend   |
| Westminster City Council    | 5.5.3 In the second paragraph, where it describes the different levels of development categories within the Code of Construction Practice (CoCP), it notes basements are categorised as Level 2 projects. However, basements are a category of their own within the CoCP that are subject to some, but not all of the requirements of other Level 2 projects. This reference should therefore be amended accordingly.   | Noted                    | Amend   |
| Westminster City Council    | 5.5.3 The third paragraph notes that Level 3 projects may be upgraded to Level 2 projects, but it is not described in what circumstances this would be sought. It is suggested that references to the considerations outlined within Westminster's CoCP Guidance, which includes regard to cumulative impacts where several projects are ongoing at the same time, are therefore added. The paragraph also notes that a Construction Management Plan would be required for Level 2 projects which is inaccurate as it is a Site Environmental Management Plan that is sought for such projects.   | Noted                    | Amend   |
| Westminster City Council    | <p>5.5.4 Whilst the council supports early engagement with neighbours (See Westminster's Early Community Engagement Guidance Note, February 2022) and thus the broad principles of this section, it is not the role of a neighbourhood plan to criticise the councils existing consultation processes, nor seek to impose new processes or procedures, such as who the council should consult and when, as currently drafted. Whilst feedback on the effectiveness of existing consultation processes is welcome, the process to be followed is ultimately a matter for the council to determine as local planning authority.</p> <p>To address this, we advise retaining the first two paragraphs of 5.5.4, deleting footnote 5, and deleting the following paragraphs within this section. It may also be advisable to add reference to the council's 'Early Community Engagement' Guidance Note.</p> | Agreed                   | Amend section 5.5.4                               |
| Westminster City Council    | BEL3 A. This clause is considered to impose onerous requirements on developers, particularly householders, as it would require applications for matters such as a householder extensions to submit Construction Method Statements and Traffic Management Plans. These would also go beyond what is required of projects of these levels within the council's CoCP.  | Agreed                   | Amend BEL3A and delete BEL3B. Revise section 5.5. |

| Name of body/<br>'Resident' | Representation   | Response by Belgravia NF   | Amendment to<br>Reg 14 Draft Plan     |
|-----------------------------|--|--|---------------------------------------|
|                             | <p>Issues of noise associated with these types of development are managed by standard conditions of planning permission limiting construction hours during the weekends and holidays and to during the day-time. Extensions would likely need some construction vehicles and stopping up of the public highway for skips for example, issues which are considered and managed through the highways licensing regime.</p> <p>Officers understand the issue of the cumulative impact of many Level 3 projects in an area, and as such, under the terms of the CoCP, the council has the right to 'upgrade' proposals to Level 2 projects, meaning more stringent requirements apply. Where this is considered necessary, pre-commencement conditions would be used to require extra supporting documentation on mitigation measures to be submitted to the council's Environmental Services team for approval, to ensure compliance with the CoCP. However, this is a process that is at the council's discretion as the decision-making body, and therefore not something that the neighbourhood plan should seek to alter. Furthermore, it is not something that is considered appropriate or reasonable to require from all householder planning applications.</p> <p>B. Whilst the council support encouragement of continued engagement between applicants and neighbours, this clause appears to be more an issue of process and it is unclear how it would be used to determine a planning application, which should be the focus of policies within the plan.</p> <p>As worded the policy seeks to influence council decision-making processes, including validation requirements, it is not in full accordance with Westminster's CoCP Guidance and it is overly onerous and restrictive of householder development so would not contribute to sustainable development. Both the policy and section 5.5 therefore require amendment to meet the 'Basic Conditions'.</p> |  |                                       |
| Westminster City Council    | Non-Policy Action 3: The necessity of the action under clause A is questioned. Many of these issues are already covered by the CoCP, so this could result in the duplication of requirements and cause confusion to developers and applicants. Other elements would be dealt with outside of the remit of planning and between third parties, not the council (such as contractual agreements related to addressing any damage). We therefore suggest this action as worded should be reconsidered.  | Agreed   | Amend Non-Policy Action 3             |
| Westminster City Council    | BEL7 On requirement 'c', in many cases exterior painting is permitted development. It could however be more applicable when considering listed building consent applications, so we advise that this clause is omitted from the policy, but that a paragraph could be added to the justification   | Agreed. Reference in the supporting text will be added to signpost the | Amend BEL7 c and the supporting text. |

| Name of body/<br>'Resident' | Representation  | Response by Belgravia NF  | Amendment to<br>Reg 14 Draft Plan  |
|-----------------------------|---|---|--|
|                             | to note that within listed buildings regard should be given to ensure that the colour palette should be sympathetic to the character and significance of the building .   | information on colour palettes in the Design Code.  |  |
| Westminster City Council    | BEL8 We question whether policy should also introduce greater flexibility when artworks are part of temporary exhibitions in connection with specific events – so policy does not prohibit installations such as the recent temporary 'Wandering Art Project'.  | Agreed.   | Make clear in supporting text that the policy only applies to permanent installations. |
| Westminster City Council    | BEL8 In addition, requirements under clause A(c) for monuments or public art to have a connection to the local area is considered overly onerous – the prominence Hyde Park Corner, may mean it is suitable for monuments with connections to national rather than local history.   | It is recognised that Hyde Park Corner should be excluded. However, for the remainder of the area more local connections are considered suitable. | Amend BEL8 and supporting text.  |
| Westminster City Council    | 6.2.2 We suggest the benefits of supporting social housing provision could be better expressed through replacement of the final paragraph with the following wording:<br>"The continued provision of social housing in the area is supported in the interests of meeting high levels of housing need in Westminster, contributing to a mixed and balanced community, and sustaining demand for a range of local amenities that contribute to the areas 'village feel'."   | We do not agree with the proposed wording – 'high' is subjective and it is unclear what a 'mixed and balanced community' is expected to comprise. |  |
| Westminster City Council    | BEL9 The policy and figure 9.1 [sic 6.1] refer to Secondary Centres which includes Eccleston Street and Eccleston Yards. Secondary Centres are not London Plan or Westminster City Council designations, so the justification should more explicitly clarify that these are new neighbourhood plan designations.  | Noted   | Add footnote to Figure 6.1 and supporting text to provide clarity                      |
| Westminster City Council    | BEL9A This clause seems to encourage new hotels outside of the town centre hierarchy and CAZ, within residential areas, without further justification. Some reasons are mentioned in the introductory paragraphs noting security and soundproofing of prestige hotels, however regard would also be needed to the impacts of visitor numbers coming and going at un-neighbourly hours and servicing impacts, for example. This approach is also contrary to City Plan policy 15 (G) on hotels. We therefore advise this policy is re-drafted to ensure conformity with Westminster's City Plan. | Agreed – this was not the intention of the policy.  | Amend BEL9A  |
| Westminster City Council    | BEL9B a) As worded, this seems overly stringent in requiring commercial uses within commercial areas to have no impact upon residential amenity to a point where the primary function of such areas as the home to commercial uses could be compromised. We therefore suggest it is softened  | Agreed  | Delete Clause BEL9B a.   |

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|-----------------------------|---|--------------------------|---|
|                             | to require that impacts of commercial activity are managed to protect amenity more generally, such as around issues related to waste, odour and highway impacts, for example. However, these points are covered by clause 'c', so 'a' may not be necessary and could be omitted.  |                          |   |
| Westminster City Council    | BEL9B b) This condition is overly prescriptive and restrictive and could harm the viability of some uses, notably pubs. It could also inadvertently inhibit other uses from operating, for example a new bakery may need to operate earlier than opening times for customers. We therefore recommend that this is reworded to enable more flexibility for decision-makers, for example: 'there are conditions attached to the permission to control operating hours in order to protect amenity, and..'   | Agreed                   | Amend Clause BEL9B b.                                       |
| Westminster City Council    | BEL10 To aid clarity it would be useful if the justification could expand on what is meant by 'flexible terms' in clause A. Decision-makers may need to consider planning conditions to address clause B, but 'flexible terms' could be misconstrued as flexible in terms of permission and conditions, rather than in terms of rental or leasing arrangements, which may be what is meant under clause A.  | Agreed                   | Amend BEL10   |
| Westminster City Council    | BEL11 It is good that this policy recognises play space deficiency in the southern part of the Neighbourhood Area, however it may be beneficial to make clearer that new open space is also supported across the area – e.g. when new development is proposed in the north of the neighbourhood area.   | Agreed                   | Supporting text in section 7.2.1 to be expanded to clarify. |
| Westminster City Council    | BEL11B We suggest deletion of 'small scale', as this could inadvertently support arguments for minimal levels of provision.   | Agreed                   | Amend BEL11B  |
| Westminster City Council    | 7.2.2 We suggest that alongside reference to CIL, it should also mention the role of s106 in securing open space provision.   | Agreed                   | Amend section 7.2.2   |
| Westminster City Council    | 7.3.1 a) Garden Square Trees<br>It is suggested that this paragraph recognises the historic and townscape importance of London Planes in garden squares. It should be noted that the last bullet point is inaccurate as London Planes do not cause sticky pollen and it is the seeds that can sometimes cause allergies. Within the last paragraph it would be more balanced to set the context of tree management first with the primary issue being to ensure tree safety as far as possible, then consider management to control inconveniences associated with London planes. As currently worded, this section would likely be used to justify the removal or harsh pruning of trees that provide important benefits, and is therefore not supported by the council. | Noted                    | Amend section 7.3.1   |
| Westminster City Council    | 7.3.1 b) Private Garden Trees<br>The first sentence of the paragraph would be contrary to City Plan policies and the removal of London Plane trees would not be supported, so this sentence should be deleted. Whilst we  | Noted                    | Amend section 7.3.1   |

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|                             | welcome the emphasis given to the importance of considering biodiversity, it should also be recognised that proposals to remove trees for development are not solely determined based on their contribution to biodiversity; townscape, amenity, character and appearance of the conservation area are also important factors.   |                          |                                   |
| Westminster City Council    | <p>7.3.1 Pavement and Street Trees</p> <p>The 3rd paragraph could also usefully refer to the impacts of climate change as being a further reason for the planting additional street trees, as the council is broadly supportive of additional street planting in the area, and is of the view that this can be provided in a manner that is not detrimental to heritage or character. Furthermore, impact on townscape and heritage is just one of many considerations which feed into the principles of 'the right tree in the right place'.</p> <p>In the 4th paragraph, it is also be worth referring to the council's ESPD as this includes some useful guidance on trees.</p> | Noted                    | Amend section 7.3.1               |
| Westminster City Council    | <p>7.3.1 Trees on Major Development Sites</p> <p>We suggest that 'major' is omitted from the above heading as the approaches outlined within 'd' would be applicable to all developments affecting trees. Trees are not defined as mature by their height so we would advise omitting reference to height (8m).</p>  | Noted                    | Amend section 7.3.1               |
| Westminster City Council    | BEL12A We suggest adding 'with the aim of creating a balanced age structure'   | Agreed                   | Amend BEL12A                      |
| Westminster City Council    | BEL12B We suggest instead of referencing the regulations, the clause is reworded to 'applications for consent to remove trees protected by Tree Preservation Orders as well as notifications of intent to remove trees in conservation areas will be considered having regard to...'   | Agreed                   | Amend BEL12B                      |
| Westminster City Council    | BEL12B e and BEL12C We would caution against conflating tree removal applications with applications for development, as the reference to clause C does. Notifications of intent to remove trees in conservation areas do not have to include a reason for the proposal, so this suggestion would not be enforceable. Note applications for work to TPO-ed trees do have to include a reason for them to be valid.  | Agreed                   | Amend BEL12B and C                |
| Westminster City Council    | <p>BEL12D Should be rephrased to recognise not just biodiversity importance, but also heritage and townscape considerations, as outlined within the 'right trees in the right place' and ESPD principles. In doing so, the emphasis on replacing Plane Trees, which are a defining feature of the character of the area, should be removed.</p> <p>Clause D &amp; E could be merged.</p>   | Agreed                   | Amend BEL12D and E                |

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| Westminster City Council    | BEL14A c The first sentence of this clause is overly restrictive as requiring to 'reflect the prevailing density' could rule out any densification, which is necessary to meet other policy objectives. We therefore suggest that this should be re-phrased to 'respond to the prevailing density', rather than 'reflect', in order to meet basic conditions.  | Agreed  | Amend BEL14A c                                      |
| Westminster City Council    | Belgravia Design Code – Introduction: Understandably, the Code seems heavily focussed on the Regency/ Victorian elements of Belgravia. As such, it seems best placed to guide development in such character areas, rather than the fringes of the neighbourhood area where a different character exists. The parts of the neighbourhood area to which the code is intended to apply should be made clear in both this document and the neighbourhood plan.   | Agreed  | Various amendments to Belgravia Design Codes report |
| Westminster City Council    | Belgravia Design Code – Design principles 1.2 - 1.3: This assumption that any increase in building height for buildings independent of a terrace will be detrimental to a character's area is overly restrictive. It is contrary to City Plan (and the neighbourhood plan) policies that would support some increase in height, subject to heritage, design and townscape considerations and assessment of impacts. It should therefore be amended to require building height to respond sensitively to existing building heights in order to meet basic conditions. | Agreed  | Various amendments to Belgravia Design Codes report |
| Westminster City Council    | Belgravia Design Code – Design principle 1.5: Although reference to Westminster City Plan paragraph 40.11 has been included, to rule out upwards extensions would be contrary to it – this principle should therefore be amended in order to meet basic conditions.  | Design Principle 1.5 is not saying no increase in height; it is acknowledging WCP para 40.11 in that any increase has to be uniform across the block. |   |
| Westminster City Council    | Belgravia Design Code – Section 2.10: We suggest that the last paragraph should be more positively worded by updating it to reflect the ESPD and principles outlined within the principle of the 'right tree in the right place'.  | Agreed  | Various amendments to Belgravia Design Codes report |
| Westminster City Council    | Belgravia Design Code – Design principle 12.2: It should be acknowledged that if existing building height is considered a negative feature, it is unlikely that buildings of lower building height will be viable development options.   | Agreed  | Various amendments to Belgravia Design Codes report |
| Transport for London        | On page 13 of the draft Neighbourhood Plan there is reference to discussion of closure and also potential integration of the current VCS into an enlarged and remodelled railway station. However, TfL has no current plans to move the coach facility from its current site in Belgravia. We suggest this is deleted from the draft Plan.   | Noted   | Delete reference to Coach Station definitely moving |

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| Transport for London        | <p>Section 5.2 and BEL1: This policy focusses on “the local distinctiveness of Belgravia, as characterised by its blend of 19th century buildings within a planned street network” and does not recognise differences in the area, particularly at its periphery. The two TfL CD development opportunity sites are located on Buckingham Palace Road, this part of which is characterised by larger, 20th century transportation and commercial buildings. As a set of general design principles this policy therefore does not appear to apply to our two opportunity sites or other larger, plots with 20th century development.</p> <p>This would indicate that it would be appropriate for different design principles to apply to A roads and other main streets such as Buckingham Palace Road .</p>  | <p>The policy is intended to be read as a whole and apply to the whole of the Neighbourhood Area. Neither BEL1 nor the reasoned justification state that a different set of design principles should apply along A-roads or other main streets. The policy requires high quality, sustainable design and architecture that respects and enhances the character of the surrounding area. This applies as much to sites on the periphery of the Area as it does to sites in the middle. However, in order to recognise that the periphery of the Area does relate to adjacent areas that are very different in character, additions will be made to the Design Codes report to acknowledge this.</p> | <p>Add section on peripheral sites to the Design Codes report</p> |
| Transport for London        | <p>In order for the draft Neighbourhood Plan to be in general conformity with the development plan, we consider that it should recognise that WCC’s City Plan identifies the Victoria Opportunity Area as a location that may be suitable for tall buildings, particularly where they help to frame the setting of Victoria Station; Policy 41.C says:</p> <p>“There may be potential for further tall buildings in this area that complement and help to frame the setting of Victoria Station and Victoria Street and contribute to the quality and character of the existing cluster....</p> <p>“The prevailing context height in Victoria is 6 residential storeys (20m) with a varied context. Tall buildings in this area of 2 to 3 times the context height may be appropriate.”</p> <p>This is clearly relevant to Buckingham Palace Road and should be recognised in the Neighbourhood Plan. Proposals for tall buildings within the Opportunity Area should be considered in accordance with London Plan policy D9 and WCC City Plan Policy 41.</p> | <p>The Plan does not have a policy on tall buildings. Its commentary relates to buildings that are not considered ‘tall’ within the London Plan definition but are taller than those that surround them. In this regard it is not considered necessary or appropriate for the Plan to have reference to specific buildings along a particular road in the Area.</p>  |   |

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| Transport for London        | <p>BEL14A a. We do not consider that paragraph a. is clearly drafted and suggest the following changes for the sake of clarity. In particular the use of the word “reflecting” would suggest symmetry with the area within which development is located, which would not usually be a suitable response to context. We also consider the word “nature” to be unclear and ambiguous. We suggest replacing the reference to “requirements” of Design Codes to “principles”, which would accord with the Design Codes document itself which says: “The design code reflects principles drawn from the character of the context rather than prescriptive standards” (page 3). They must demonstrably and positively respond to the principles requirements of the Belgravia Design Codes, and also respond to the <del>reflecting the nature of any</del> character of the area in which it is located or which it is adjacent to.</p>  | <p>Agreed although it is not appropriate for development to simply ‘respond to the character of an area...’ A response could be a negative one.</p>   | <p>Amend Policy BEL14A a</p>                                      |
| Transport for London        | <p>BEL14A b. and c. Paragraphs b. and c. are not positively drafted and could inhibit the optimisation of development opportunities and the achievement of sustainable development within the Opportunity Area. As such we do not consider the unduly restrictive draft Policy to be in conformity with the NPPF (eg. paras 125 and 130) or strategic policies of the development plan (eg. London Plan Policies GG2, SD1, D1, D3 and H1, and Westminster City Plan Policies 4 and 8) which require development to follow a ‘design-led’ approach and make effective use of land and optimise development potential, particularly in well-connected locations such as Belgravia and within Opportunity Areas.</p> <p>In particular we note that para 4.1 of the City Plan says “we want to encourage growth in this Opportunity Area” and then para 4.2 (Home and Jobs Growth) says in relation to Policy 4 that: “The well-connected nature of the area means that it has the potential to accommodate higher residential and office density, particularly where it contributes to achieving the other objectives of the Opportunity Area.”</p> <p>It is important to note that redevelopment of the VCS site in particular would deliver improved transport facilities and interchange, inclusive and high quality public realm and other benefits including a high proportion of affordable housing within the Opportunity Area - TfL CD is required by the Mayor to deliver at least 50% affordable housing across its portfolio of development sites. You could consider referring, in general terms, to the potential public benefits of developing the ‘major development sites’ in your Neighbourhood Plan.</p> <p>Paragraph 4.2 goes on to say that:<br/>“Parts of the Victoria Opportunity Area fall between conservation areas, providing greater scope for change.”</p> | <p>It is recognised that the periphery of the Area does relate to adjacent areas that are very different in character (including the parts of the Neighbourhood Area that are within the Victoria OA). Additions will be made to the Design Codes report to acknowledge this.</p> | <p>Add section on peripheral sites to the Design Codes report</p> |

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|                             | <p>It is also important to note that large parts of our two major development sites within the Neighbourhood Plan area fall outside of a conservation area and therefore provide greater scope for change. Much of the coach station and the office building to the south of the coach station are outside of a conservation area. In addition the majority of the Terminal House, Belgrave House and Ebury Gate, Buckingham Palace Road site is outside of a conservation area.</p> <p>Therefore, we suggest that the draft Neighbourhood Plan policy should make a distinction between sites that are located within the Opportunity Area, and those outside , and also between land that is inside conservation areas and land that is outside.</p>   |  |   |
| Transport for London        | <p>In addition, as presently worded, the draft Policy requires proposed development to “preserve” views, which implies they should not be changed and therefore would be a major constraint on development and growth. In conformity with the strategic policies of the development plan (in particular London Plan policy HC4), we suggest alternative wording which would require that development should seek not to harm Strategic Views or those within the conservation area that are identified in the Neighbourhood Plan (these are based on the Belgravia Conservation Area Audit) and where possible enhance them. None of the additional views that are identified as being of “local importance” (Fig. 5.8 of the draft Neighbourhood Plan) impact on TfL CDs sites and we have no comment on them.</p> <p>We suggest:</p> <p>b. Development should apply a design-led approach to optimise the use of land and meet identified needs for new housing and workspaces. <del>The height, bulk and massing of any proposals should respect</del> The scale and character of the local built environment (including the prevailing context height and skyline) should be taken into account when considering the height, bulk and massing of any proposals. Development proposals should not harm Strategic Views or other views identified in this Neighbourhood Plan and where possible should enhance them. <del>and preserve and, where possible, enhance views.</del></p> <p>c. Outside of the Opportunity Area and within the conservation area, <del>Across the site,</del> development should respond to <del>reflect</del> the prevailing density in the surrounding area in order to respect the historic context of the location. Where proposed densities are clearly different from the prevailing density, applications must clearly demonstrate how the proposals will respond appropriately to local character and context including <del>not harm</del> the prevailing townscape.</p> | Agreed although the term ‘design-led needs qualification in the supporting text. | Amend BEL14Ab and Ac and add supporting text. |
| Transport for London        | 5.11 – Hyde Park Corner and Action 7 – Cycle Movement Around Monument Zones: We welcome the intention to work with TfL and Westminster City Council to identify and develop safe cycle routes. However, we are puzzled about the rather negative wording in the preceding paragraph  | Agreed   | Amend supporting text in section 5.11.        |

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|                             | including the statement that 'any actions to increase the flow of cycle or other traffic through Hyde Park Corner's open space cannot be supported by the Forum' . It would be helpful if the Forum could put forward some suggestions to TfL and WCC that might help to address perceived safety issues in this area.  |   |   |
| Transport for London        | 7.4 Streetscapes and Policy BEL13 – Streetscapes: We would encourage you to widen the scope of this section or to add in another section setting out a positive approach to implementing Healthy Streets and encouraging active travel. We would welcome suggestions for improved cycle infrastructure including new or improved links as well as specific locations that may be suitable for cycle parking including cycle hangers or cycle hire stations. It would be helpful if the Neighbourhood Forum could develop an aspirational plan showing locations that may benefit from improvements for cycling . This may be in conjunction with proposals to reduce traffic and car dominance. Similarly it would be helpful to identify areas that could be targeted for improvements that benefit pedestrians including crossing facilities or wider pavements.  | The matter of improved cycle infrastructure and specifically routes was not a significant issue raised by the local community therefore has not been pursued further. The Forum would not wish to include indicative cycle routes and other potentially sensitive proposals without full and through consultation with the community. |   |
| Transport for London        | 7.4 Streetscapes and Policy BEL13 – Streetscapes: We welcome the support in Policy BEL13 for cycle infrastructure including cycle storage hangars and cycle racks. We would welcome an additional reference here to ensure that account is taken of TfL's Streetscape Guidance and that the design and location of cycle infrastructure is in line with London Cycling Design Standards (LCDS).   | Agreed  | Amend supporting text to BEL13 to make reference to guidance and standards. |
| Transport for London        | <p>7.5 Traffic Flows and Action 11 – Traffic: We welcome the intention to work with TfL on projects to minimise traffic including a potential traffic reduction scheme as well as investigating the potential to consolidate deliveries. The volume of traffic across central London is on a downward trend due to the combined effects of a number of Mayoral initiatives and work by TfL. We have recently implemented a safety scheme impacting all side roads off Grosvenor Place with beneficial effects on road safety and through traffic.</p> <p>We are keen to work with the Neighbourhood Forum and Westminster City Council to explore the potential for projects that apply the Healthy Streets Approach and work towards the Vision Zero objective. We have experience elsewhere in assisting in the design and implementation of Low Traffic Neighbourhoods. In particular we would encourage you to place a much stronger focus on reducing the amount of space taken up by cars for both parking and circulation. The effects can be seen in areas such as Belgrave Square which are car dominated to the detriment of other users including pedestrians and cyclists. The reduction and rationalisation of car parking will have a key</p> | Noted   |   |

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|                             | role to play in reducing traffic and should be included in the list of objectives. We would support projects or proposals that seek to convert car parking into alternative uses or initiatives that reduced the number of vehicle deliveries.   |   |                                    |
| Victoria BID                | The Forum may wish to mark up on its own maps where the Victoria BID footprint overlaps with the Belgravia Neighbourhood Forum or at least refer to this in the body text of the Plan.   | It is not considered appropriate to show the BID footprint however, it is acknowledged that the Victoria Opportunity Area where most of the relevant activity is proposed should be shown on a map (along with the Crossrail 2 safeguarding). | Add new map at end of Section 2.3. |
| Victoria BID                | One of the characteristics set out at p63 of the current Plan is that the Belgravia Area “does not require the attraction of substantial footfall from outside the Belgravia Area to sustain its economic viability”. The Forum might wish to consider the extent to which this position might be reinforcing an over presence of vehicles and that appropriate increases in footfall may support efforts to rebalance modes, reduce traffic within Belgravia, and protect its village feel whilst bringing additional economic security to the businesses located within the Forum area . | It is highly questionable as to whether encouraging significant growth of footfall in Belgravia will reduce traffic levels.   |                                    |
| Victoria BID                | We support efforts to reduce traffic within Belgravia and note the aspiration to not divert traffic to neighbouring residential streets within the area by way of traffic discouragement schemes. We would propose that the approach be qualified that the Forum will seek to also avoid transferring traffic problems outside of its area.  | Noted and agreed  | Amend section 7.5.1                |
| Victoria BID                | The Forum may also wish to consider referring to the three Air Quality Focus Areas that traverse the Forum’s footprint to the southeast and northwest. Details of these areas, which indicate overlaps of high footfall and high levels of pollution, are missing from the current draft and would likely strengthen the evidence base for proposing traffic reduction measures. The Forum may want to consider including a heat map showing levels of pollution hotspots in the area. Currently the only heat map provided in the report refers to monument saturation .                  | Agreed although pollution heat maps are likely to be quickly out of date.   | Add text to Section 7.5            |
| Victoria BID                | The Plan assumes traffic levels at Victoria Station and the Coach Station will “reach their former levels within the next 2-3 years” (p10). What is the evidence for this and what projections might the Forum be able to put forward re traffic levels across the lifetime of the plan?   | Noted   | Amend 2.2                          |
| Victoria BID                | Section F of POLICY BEL 12 sets out expectations in regard to maintaining green infrastructure. This is welcome. The Forum might wish to set out what it expects of new monuments and public art also in terms of maintenance and cleaning.  | Agreed. Whilst this is not a policy matter, it can be reflected in the supporting text.   | Amend 5.10.2                       |

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| Victoria BID                | <p>The effects of climate change, once anticipated for the UK, are now being felt. Whilst the plan does refer to flooding there is little information as to where surface water flooding is projected to occur over the lifetime of the plan and how this might be mitigated through development. We would encourage the Forum to set out its position in relation to development and sustainable drainage. This is perhaps especially important given that the plan appears to discourage street tree planting. Street trees provide multifunctional benefits. As well as providing cooling (the Forum will be aware that increasing urban heating is a further effect of climate change) they attenuate rainfall.</p> | <p>The point is noted and the Forum strongly supports sustainable drainage. In policy terms, such matters are already addressed by the City Plan. The Plan does not discourage planting of street trees – see Policy BEL12E.</p>   |                                   |
| Victoria BID                | <p>The Forum may wish to consider amending the wording of section D of POLICY BEL 12; as written it suggests trees are not green infrastructure whereas Westminster City Council's City Plan does.</p>  | Agreed   | Amend BEL12D                      |
| Victoria BID                | <p>The initial clause of the first sentence of Section F of POLICY BEL 12 could be reworded to include reference to "high quality" green infrastructure so as to set out the Forum's expectations for planting.</p>   | Agreed   | Amend BEL12F                      |
| Victoria BID                | <p>Whilst acknowledging the Forum's wish to maintain and enhance Belgravia's village feel, it may wish to reflect on the extent to which the Plan can actually influence development outside the Neighbourhood Forum area, for example in relation to section 5.4. where the Plan proposes a core principle for development height outside its area.</p>  | <p>The Forum disagrees with the assertion that section 5.4 proposes a core principle for development height outside its area. The relevant paragraph starts, "Accordingly, a core principle should be that any 20th or 21st century buildings, whether inside or outside the Neighbourhood Area, which are significantly taller than those in the immediate vicinity should not be taken to establish a new, taller context height." What this is seeking to confirm is that context height – an important principle established by the City Plan – does not include outlier buildings which were developed at a different time to the majority of other buildings and at a much greater height. This confirms</p> |                                   |

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|                             |   | the definition in the City Plan glossary. Clearly context cannot only be provided within a neighbourhood area boundary as development is not limited by this. The Plan simply seeks to confirm that buildings outside the area in neighbouring Victoria are much taller than those in Belgravia. It cannot be the case that the context height provided by these tall buildings should automatically trump the lower context height of the Belgravia buildings just because the Opportunity Area boundary has extended into Belgravia. |  |
| Victoria BID                | At the same time, the Forum may also wish to consider revising relevant policies to include references to how it expects development to unfold adjacent to schools within its area. We are aware of local aspirations to improve the playground offer of St Peter's Eaton Square C of E Primary School for instance .   | The schools have not explicitly identified these needs as something that they wish the Neighbourhood Plan to address. In this regard therefore, the existing policies in the City Plan are considered to be sufficient.  |  |
| Victoria BID                | Evidence Paper 8.1.2 (Heritage Sensitive Development): The Forum might want to consider the unanticipated outcomes of integrating all utility facilities into a single box and clarifying its position on this. Where this results in bulkier structure it may be contrary to the Forum's aims for pleasant streets. Elsewhere, council advertising to highlight speed reduction measures is highlighted in the evidence paper as 'noise' whereas the Forum proposes to fund speed reminders via Neighbourhood Community Infrastructure Levy monies . | Agreed re utility cabinets. Regarding speed advertising, the Forum is not saying that this should not be provided, but that it should be in appropriate locations.   | Amend Evidence Paper re utility cabinets.            |
| Victoria BID                | The plan is generally easy to read. Some terms may benefit from being explained or clarified. For example, what the Grosvenor Management Scheme is and what it aims to achieve could be set out where the scheme is first mentioned. It could be clarified that the proposed Crossrail 2 exit facing Belgravia is not the only exit put forward in the high-level plans that were publicised as part of the   | Agreed that certain items could be explained, including the Crossrail 2 exit.  | Various amendments including addition of a glossary. |

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|                             | 2016 consultation. The Forum may also wish to consider including a map setting out the locations of proposed NCIL projects.   | Disagree that a map of NCIL projects should be provided as these are only suggestions at the current time.   |                                   |
| Grosvenor                   | <p>Our main area of concern is that the draft Plan appears to restrict, rather than enable, sustainable and appropriate growth and development within Belgravia. Despite some acknowledgment within the supporting text that the area has growth targets, the draft policies (particularly around townscape, heights and architectural character) are written in a manner which would limit development across the whole Neighbourhood Area. This is coupled with the prevailing theme within the draft Plan that Belgravia is, and should be treated as, a 'village' and that all development within the Area should be 'recognisably Belgravia'. A number of the policies and the non-policy actions relate to measures which look to preserve Belgravia exactly as it is, rather than addressing how new growth can be accommodated and how Belgravia may evolve and adapt to future social, economic and environmental needs and requirements.</p> <p>A significant portion of the Neighbourhood Area is within the Central Activities Zone ('CAZ') and a small element is within the Victoria Opportunity Area ('Victoria OA'). Both of these areas have been allocated, at a strategic level, as being essential to the delivery of growth targets for London to provide new jobs, homes and places. Belgravia has exceptionally high public transport accessibility, with most of it being within PTAL category 6b. The draft Plan would impose far-reaching onerous restrictions which could limit the ability of the Neighbourhood Area (and even the areas on the edges of the Area) from accommodating the growth required.</p> <p>In respect of the CAZ, aside from encouraging small-scale workspaces (Policy BEL10), there are no policies relating to, or guiding, development within the CAZ.</p> <p>Westminster's City Plan Policy 1 (Part B) is clear that growth will be delivered in the Borough primarily through the intensification of the CAZ (as well as other designated areas) with "commercial-led and mixed-use development to provide significant growth in office, retail, and leisure floorspace, alongside new homes". The draft Neighbourhood Plan does not acknowledge the role of Belgravia within the CAZ, and how Belgravia can contribute to achieving Westminster's growth targets. In this respect, the draft Plan is not prepared positively and, in some instances, undermines strategic policies.</p> | <p>The Plan, once made, will form one part of the development plan along with the City Plan and London Plan. As such it should be read together with those documents and the policies of all three documents be taken into account. The Plan does not have to provide specific policies to further guide development in the CAZ because other policies in the other documents making up the development plan already do this. The Plan focuses, amongst other things, on ensuring that high quality design informs new growth in the Area. It is acknowledged that the area includes the CAZ and the Victoria Opportunity Area and, as strategic matters, the Plan cannot conflict with them. However, this equally does not mean that the Plan should disregard the matters of importance to the community and focus on providing further detail as to how growth in these areas should be maximised.</p> |                                   |
| Grosvenor                   | There is only one reference to the Victoria OA within the draft Plan and this raises concern about the impact of building heights of the Future Victoria scheme on the skyline of Belgravia. The draft Plan should acknowledge that the Neighbourhood Area incorporates part of the Victoria OA and the specific growth targets set by the Mayor and Westminster City Council for this area. The draft  | The Plan does not include any planning policies concerning heights or development outside the Neighbourhood Area. It is entirely   |                                   |

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|                             | <p>Plan should not, even via supporting text, raise 'concern' over redevelopment within the Victoria OA for which there is strategic support, nor set out a non-policy action (no. 5) which seeks to ensure that development proposals outside the Neighbourhood Area do not have a detrimental impact on the townscape and its views in the Area. This is contrary to the requirement for Neighbourhood Plans to be prepared positively and could result in development within the Victoria OA being inappropriately constrained, limiting the ability of the OA to meet the strategically set targets. The draft Plan should acknowledge and set out the Forum's plan for the growth targets set for the CAZ and the Victoria OA – this should be addressed within the Vision, Objectives and the Pillars of the Plan.</p>   | <p>incorrect to state that the Plan uses language such as "seeks to ensure" in respect of non-policy action 5; it does not and this is deliberate. The Plan's vision and objectives reflect the views of the community. Whilst it is acknowledged that some of the context for the area is provided by the Victoria OA, it should not be compelled to be led by this as lead principle upon which the bulk of the Plan should be informed.</p> |   |
| Grosvenor                   | <p>Building Heights and Conservation: Our shared view is that the heritage and architectural character of Belgravia is special and unique. It should be celebrated and enhanced. This is evident in how we approach development within Belgravia, and how we require our tenants to approach development. We are therefore in agreement with many sections of the draft Plan in respect of heritage and townscape.</p> <p>However, as noted above, we are conscious of the role of Belgravia in contributing to the delivery of growth which has been set out as required for London. Our concern is that the building heights and architectural policies could inappropriately and unnecessarily limit that growth. There appears to be a general presumption the "old" is automatically good and "new", automatically bad. A more nuanced approach is required. An appropriate balance should be struck between achieving growth and development and conserving historic character, through the implementation of well-designed, considered architecture. The draft Plan does not provide the scope for this balance to be struck.</p> | <p>The Design Codes seek to strike a balance between old and new. New buildings clearly must meet modern standards and be design to be used in the way their occupiers wish them to be used. But this does not mean they cannot reflect historic character. The Plan does not include any planning policies relating to building height.</p>   |   |
| Grosvenor                   | <p>'Recognisably Belgravia'</p> <p>The Forum's view is that those areas which are 'recognisably Belgravia' should be protected, and the 'over-height' development on the periphery 'negatively' affects the Neighbourhood Area. Furthermore, it is listed in the justification for the draft Plan's Pillars that the Forum will campaign for the area which is 'recognisably Belgravia' to be expanded<sup>4</sup>. We do not support this approach and do not consider its inclusion within the Plan is appropriate.</p>  | <p>'Recognisably Belgravia' does not limit what is possible and without any suggestion as to what might be preferred, this is considered to be an appropriate approach. Further explanation of what 'recognisably Belgravia' means will be provided.</p>   | <p>Explain further what 'recognisably Belgravia' means. Amend references to stuccoed terraces in the Plan and Design Codes.</p> |

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|                             | <p>Belgravia does not have clearly defined boundaries and is contiguous with a number of other areas of similar, but distinctive, characters. The draft Plan does not address the widely different characteristics of architecture, age, building typology and use seen across Belgravia, nor does it recognise the diversity of use within parts of the area. For example, Grosvenor Place, Grosvenor Gardens and Buckingham Palace Road are all quite different to one another and to the Belgravia 'core'. This is both in terms of architectural building types/features, as well as land use and relevant land use designations within Westminster's City Plan and the London Plan.</p> <p>Making 'recognisably Belgravia' the Plan's touchstone is an inappropriately limiting factor that simplifies the complex history and character of the area, imposing an unnecessary constraint on growth that is not in general conformity with strategic policies.</p> <p>References to expanding the area that is 'recognisably Belgravia' should be qualified to explain that this does not necessarily require the facsimile reproduction or extension of stuccoed terraces. The justification to Pillar D at Section 3.2, paragraph 5.2.2(c), the antepenultimate paragraph of Section 5.4.1 and the first paragraph of section 8.1.1 should be amended accordingly.</p>  | <p>The reference to stuccoed terraces is acknowledged and will be amended.</p>  |                                   |
| Grosvenor                   | <p>This approach filters down to the relevant policies. Draft Policy BEL1 states that development should:</p> <p>"contribute towards the local distinctiveness of Belgravia, as characterised by its blend of 19th century buildings within a planned street network"</p> <p>As set out above, we disagree with this blanket characterisation of the area. Policy BEL1 also would require new development to demonstrate how they reflect the requirements of the Belgravia Design Codes and BEL 14 requires major development to "positively respond" to the requirements of the Codes. We felt that the Design Codes were clear, comprehensive and based on a good and thorough study of Belgravia. However, aspects of the Design Codes cannot be fully applicable to all areas of Belgravia in the same way. The concept of extending what the Plan defines as 'Belgravia' into more mixed areas, particularly at the periphery, lacks nuance and is arguably not deliverable. This is of relevance when reviewing development/renovation proposals based on their building heights, density and architectural style.</p> <p>Context matters, and Belgravia is more than stuccoed residential streets, although these form a crucial part of its historic character and charm. Modern, innovative architecture can often blend well with historic streets – for example, this is done well in pockets of St James's. The Design Codes (in particular the Design Principles) should not be used as a blanket rulebook for all development within Belgravia. There has to be an acknowledgement within the Plan that in some instances flexibility will need to be applied, and the Design Codes may well not be relevant everywhere.</p> | <p>The Plan and the Design Codes do not – and cannot – require a slavish adherence to a particular style of development. They provide a set of principles that provides cues to assist high quality development. Proposals should demonstrate how they have been informed by these cues. What it is not is a blanket rulebook and it is not expected to be applied in that way.</p> |                                   |

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| Grosvenor                   | <p>Whilst there is a brief reference in the Design Codes to modern designs, we consider that BEL1 should be amended to acknowledge the potential role of high quality, modern architecture in certain instances, particularly in those parts of the area that are not characterised by homogenous, stuccoed terraces.</p> <p>BEL1(B) could be amended to read:<br/> “Proposals for new development and redevelopment of existing buildings must demonstrate how the reflect the requirements of the Belgravia Design Codes, as relevant to the site and local context.”</p>   | <p>‘High quality <u>modern</u> architecture’ covers a far wider range of matters than simply the look of a building. BEL1B can be amended to reflect the appropriate balance of considerations that the design of a building should address.</p>  | Amend BEL1B   |
| Grosvenor                   | <p>BEL14(A(a)) could also be amended to read:<br/> “They must demonstrably and positively respond to the requirements of the Belgravia Design Codes, as relevant to the site and local context, considering the nature of any character area in which it is located or which it is adjacent to.”</p>  | <p>Agreed that amendment is needed (and have reflected suggested amendments from other stakeholders).</p>   | Amend BEL14Aa   |
| Grosvenor                   | <p>Heights, Context and Density</p> <p>There are several instances within the draft Plan which suggest that buildings which are taller than their surroundings detract from the Neighbourhood Plan area and should not be permitted – for example:</p> <p>3.2 (D) (p 16): “It is the objective of the Neighbourhood Forum...that major development on the fringes of the Area does not encroach adversely, either physically or visually, on to the Belgravia Area nor can be used to justify undesirable precedents in terms of height or density within the Neighbourhood Area.”</p> <p>5.4.1 (p28): “...we consider it highly undesirable to have any new buildings of greater height than those in their immediate vicinity. Whilst there are relatively large late- Victorian buildings on the fringes of the Area... these represent specific character buildings representative of their period and should not be used to determine context heights.”</p> <p>5.4.1 (p28): “we would go further to say that tall buildings are especially not suitable for the Belgravia Neighbourhood Area.”</p> <p>5.4.1 (p31): “a core principle should be that any 20th or 21st century buildings, whether inside or outside the Neighbourhood Area, which are significantly taller than those in the immediate vicinity should not be taken to establish a new, taller context height”</p> <p>Policy BEL14: “Across the site, development should reflect the prevailing density in the surrounding area in order to respect the historic context of the location. Where proposed densities are clearly</p> | <p>With the exception of Policy BEL14, none of the other cited parts of the plan represent planning policies. Therefore it is incorrect to suggest that development ‘should not be permitted’ insofar as it is the Plan that requires this. It does not. It is acknowledged that the wording of Policy BEL14A c could be amended but the principle of the prevailing density informing development proposals still holds.</p> | Amend BEL14Ac to read ‘respond to the prevailing density’ |

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|                             | <p>different from the prevailing density, applications must clearly demonstrate how the proposals will not harm the prevailing townscape.”</p> <p>Design Code 1.3: “If the height of a proposed development or refurbishment is materially greater than the heights of surrounding historic buildings, such a design will be considered detrimental to the area’s character”</p>   |   |                                   |
| Grosvenor                   | <p>In addition, the impact of Policy BEL5 in respect of local views of significance has the potential significantly to further restrict building heights across the Neighbourhood Area.</p>  | <p>These are views that are considered to be of local importance therefore it is appropriate that they are recognised and development preserves them.</p>   |                                   |
| Grosvenor                   | <p>We support the overarching principle that any development coming forward in the Belgravia Neighbourhood Area must carefully consider its effect on the local context and how this can be enhanced. We do not agree that buildings which are taller than their surroundings are not suitable in principle in the Area, nor do we agree that the Forum should be able to determine what does and does not constitute local context when it comes to assessing heights. This approach is not in general conformity with a range of strategic policies:</p> <p>....</p> <p>The prescriptive references to the treatment of proposals for changes in height, and the description of the way in which context height should be assessed, as listed out above, should be removed or redrafted to ensure general conformity on this matter.</p>   | <p>The Basic Conditions require that the plan <u>policies</u> are in general conformity with the strategic policies in the development plan. None of these matters represent policies presented in the Plan. Therefore it is incorrect to say that the approach is not in general conformity as it is not the ‘approach’ which is tested against the Basic Conditions in this context.</p>  |                                   |
| Grosvenor                   | <p>Role of the Conservation Area Audit</p> <p>The draft Plan strongly relies on the draft Belgravia Conservation Area Audit (2013) (‘CAA’) and we have concerns that the CAA has been used to establish draft planning policies relating particularly to architectural character and local views. The CAA was drafted nine years ago in a different context and policy framework, prior to the introduction of the NPPF and neighbourhood planning and was not formally adopted. Transposing the CAA into planning policy would effectively elevate the status of the CAA from an outdated draft piece of planning guidance to a document with the same weight as other development plan documents. This is not the purpose for which the CAA was prepared.</p> <p>If the CAA is going to be used to form the basis of planning policies which will be the basis of planning decisions, then it should be properly updated and consulted upon as part of the evidence base for the draft Plan.</p> | <p>The policy context for a CAA and the approach to evidence gathering and assembling material that forms a CAA are different matters. It is unclear what different content the CAA would contain if drafted today. It is ultimately about conservation areas and heritage which, by its nature, is informed by its history and will evolve slowly. The work on the Plan considered the content of the draft CAA and considers it to be</p> |                                   |

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|                             | <p>We have particular concerns about Policy BEL5, as proposed to be applied to the views set out in the Belgravia draft CAA and the additional views listed in Part C. The views within the CAA were not identified in the context of this policy basis. Policy DES15 of the 2007 UDP, that was applicable during the preparation of the audit, recognised (para 10.186) the greater status of metropolitan, as opposed to local, views, and sought to ensure development was “compatible with [those] views in terms of setting, scale and massing.” Policy BEL5 goes substantially further by imposing a more onerous standard within Policy BEL5(A) than set out either in the 2007 UDP or indeed Policy 40(F) of the adopted City Plan. BEL5 also identifies additional views as set out within part (C)7. There is no justification or evidence base to support the additional views.</p> <p>If the views within the CAA, and part C of the policy, are to be provided this protection, the evidence base should demonstrate that townscape testing has been undertaken and that the approach to views will not compromise the capacity and scope of the area to change and develop, particularly the CAZ and Opportunity Areas. This is required in order for the draft Plan to meet the basic conditions.</p> <p>In the absence of townscape justification and consideration of wider impact, we suggest Policy BEL5 is either removed, or amended so that it aligns with Policy 40(F) of the City Plan and the list of views, both from the CAA and Part C, are moved to the explanatory text rather than set out within policy.</p> | <p>relevant today. WCC has confirmed that there was nothing in its content that was the reason why it was not adopted. Moreover, the Westminster Local Development Scheme published in October 2022 makes the following statement about CAAs on p5: “While many of these Appraisals have long been in existence, they are still considered fit for purpose given their focus on the historic built environment.”</p> <p>The assertion that BEL5A imposes a more onerous standard than City Plan Policy 40F is rejected. BEL5A requires a view to be retained and enhanced where possible. City Plan Policy 40F requires development to contribute positively towards the characteristics of the view. It is considered that these requirements align, preventing the loss of the elements that make up a view and encouraging the view of them to be enhanced.</p> |                                   |
| Grosvenor                   | <p>Housing</p> <p>The Plan is largely silent on housing. It does not present the Forum’s approach towards the provision of housing, aside from to state that increasing housing densities on sites needs to be done with great care as the “predominant existing density is an integral aspect of the area’s architectural heritage”. The City Council has ambitious housing targets that require intensified use of land where there is the opportunity for development; and this contrasts with the Plan’s aims to establish a blanket definition for appropriate scales and heights of development/enlargements.</p>  | <p>The Plan is not required to address housing. The WCC Site Allocations DPD will identify strategic sites for housing. The Plan does not establish a blanket definition of scale or height.</p>   |                                   |

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| Grosvenor                   | <p>Commercial Viability</p> <p>A key concern is that the Plan does not fully acknowledge the local and regional context of Belgravia.</p> <p>The overriding theme within the Plan is the protection of Belgravia as a “village”. Whilst we agree with the sentiment and the importance to all stakeholders that Belgravia retains the aspects as defined as ‘village feel’, if Belgravia were an actual ‘village’ (of c. 6,000 people) it would not be able to support a fraction of the services that the draft Plan values and wants to sustain. The services and amenity offer of a central London neighbourhood are not compatible with a traditional village. In addition, this sector is ever-evolving to changing social needs and behaviours, which may or may not fit the traditional image, and certainly by 2040, ways of living will have evolved considerably, affecting demand for services and amenities relevant at that time. Therefore, the village analogy is helpful in defining some valued characteristics but limiting uses to those compatible with a traditional village would, clearly, be incompatible with strategic policy, especially relating to the CAZ and the Victoria OA9.</p> <p>Supporting the wider population and Belgravia’s large commercial population is also key to the commercial viability of the Area’s amenity. Amenities require the attraction of additional footfall to ensure economic sustainability – the location of a facility in an ‘out of the way’ location does not demonstrate that these facilities do not require significant footfall to remain viable. This is inter-related with active placemaking, new re/developments and the attraction of new retail businesses and commercial opportunities. The Plan aligns with Grosvenor’s desire for useful, independent retail; however, greater emphasis on commercial viability as well as the desirability of sensitive redevelopment is needed. It is through a sensitive approach to growth that the ‘village feel’ can be sustained in an increasingly competitive and challenging retail market.</p> | <p>The Plan uses the term ‘village’ within a metropolitan context with the focus on its residents (this being a residential-led plan). Reference to a ‘traditional village’ is therefore not relevant. The Plan certainly does not seek to limit uses to those compatible with a traditional village.</p> | <p>Add in explanation that this is an urban village to section 6.1.1.</p> |
| Grosvenor                   | <p>Retail, entertainment uses and other commercial amenities</p> <p>Policy BEL2 identifies the Mews, Kinnerton Street and Barnabas Triangle as “residential character areas” where proposals must “demonstrate that they will retain and, where possible, enhance the character of the area” i.e. a residential character. The Mews and Kinnerton Street are both within the CAZ, and incorporate a range of uses, not just residential. These uses are welcomed by the local community, for example at Eccleston Yards. The supporting text to the Policy at 5.3.1 acknowledges that the area has a commercial element. The purpose of Policy BEL2 to enhance only one element of the Mews/Kinnerton Street is therefore inappropriate and should be removed. Instead, the focus within these areas should be on encouraging appropriate commercial uses which are compatible with the residential uses they sit alongside.</p>   | <p>Kinnerton Street (apart from a tiny section), Barnabas Triangle and all of the Mews streets bar one are not in the CAZ.</p> <p>BEL2B, in addressing non-residential uses, makes clear that these could be acceptable.</p>  |   |

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| Grosvenor                   | The draft Plan only includes a policy on late-night uses; no policy exists in respect of retail or other commercial amenities (such as gyms etc.). The Plan should address all commercial uses, given Belgravia's economic role within London.   | The Plan is not required to address these points. The engagement with the community did not identify a desire for a new gym in the area. A policy covering such uses would implicitly be encouraging them. The City Plan policies are considered to be sufficient and the supporting text recognises that such Class E uses can come forward without the need for a planning application if changing from an existing Class E use. |                                   |
| Grosvenor                   | <p>We suggest that Policy BEL9 is expanded to address all visitor-facing commercial uses. This should direct commercial uses to the CAZ, Victoria OA and Local and Secondary Centres (subject to ensuring maintaining residential amenity). Outside of these areas, the 'Agent of Change' principle could be applied. We suggest the following wording:</p> <p>"Policy BEL9: Retail, entertainment and leisure uses in the Neighbourhood Area</p> <p>A. New retail, entertainment and leisure uses will be directed to the Local Centres, the Secondary Centres, the Central Activities Zone (CAZ) and the Victoria Opportunity Area (shown on Figure 6.112). Proposals for new uses must demonstrate how they will protect local residential amenity, including through the submission of robust Operational Management Plans (where relevant), which if approved must be conditioned to any planning permission.</p> <p>B. Outside of these areas, new retail, entertainment and leisure uses must demonstrate how they comply with the Agent of Change principle and ensure the safeguarding of local residential amenity and local character, including but not limited to considering impacts on noise, litter and odours (e.g. from extraction vents). Where planning permission is granted for any new late night entertainment uses (including external tables and chairs) within these areas, they will be subject to a condition prohibiting their operation between 11pm and 7am on Monday to Saturday inclusive and between 10.30pm and 7am on Sunday/Monday, unless exceptional circumstances apply.</p> <p>C. Where relevant, planning conditions will be used to control future changes of use under permitted development to ensure a continued and appropriate balance of commercial uses within the Neighbourhood Area."</p> | It is not considered that BEL9 as drafted aligns well with the City Plan and London Plan. Repetition of the Agent of Change principle in the London Plan is considered unnecessary and this is already reflected in the supporting text. How development is addressed within the CAZ is already addressed in the City Plan.  |                                   |

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| Grosvenor                   | We note that Eccleston Yards and Eccleston Street have been identified as Secondary Centres, which is welcomed. We also consider that Lower Belgrave Street should be identified as a Secondary Centre within Figure 6.1. There is a commercial element to the street which provides a local amenity via the presence of shops, restaurants and an hotel. This should be acknowledged.   | Lower Belgrave Street is not considered sufficiently commercial to represent a centre in its own right. It is also next to a school therefore increased commercialisation would have potentially detrimental impacts on school activities.   |                                   |
| Grosvenor                   | <p>Offices</p> <p>We question the references in the draft Plan to a future greater demand for smaller scale offices, rather than larger ones. This does not appear to have been based on any justified or published evidence. Recently published research by both Gerald Eve and BNP Paribas indicate that office demand in London remains strong and has returned to pre-Covid levels. Indeed, Belgravia is home to many major corporate headquarters, such as Google and American Express, particularly on its fringes.</p> <p>Whilst we do not disagree that the Plan should support the growth of small-scale workspaces (Policy BEL10), we also consider that there should be a policy support for the growth and/or refurbishment of existing large office spaces within suitable areas (which could include the CAZ and the Victoria OA). This could, for example, include policy support for measures which would improve the carbon performance of buildings, as well as measures which may improve the quality and attractiveness of office space including the creation of terraces (which could be restricted in terms of hours/use), the introduction of more modern plant and machinery equipment (to be discreetly located) and potentially enabling more flexible ground floor uses where planning permission is required.</p> <p>We suggest that Policy BEL10 be amended to read as follows:<br/> “Policy BEL10: Offices</p> <p>A. Proposals to deliver additional office floorspace and/or incubator/start-up business space (particularly on flexible terms) will be supported in principle within the CAZ, Victoria Opportunity Area, Local Centres and Secondary Centres. Proposals for the refurbishment and improvement of existing office spaces within these areas will be supported in principle.</p> <p>B. The creation of roof terraces in connection with office uses within the CAZ, Victoria Opportunity Area, Local Centres and Secondary Centres will be acceptable in principle subject to robust evidence being provided that the terrace would preserve local residential amenity, including</p> | <p>It is acknowledged that it is not appropriate to compare demand for small workspaces with large offices.</p> <p>The City Plan provides the necessary policy support for large scale offices in appropriate locations (e.g. the CAZ and the Victoria OA) therefore a Plan policy would only duplicate this. Matters relating to the environmental performance of buildings/greening are separate and again are covered in the City Plan and in the Plan at BEL12 and Non-Policy Action 4.</p> <p>The community has not expressed views about terraces. Given the sensitive nature of such matters (in terms of residential amenity) it would be inappropriate to add further policy support for such terraces outside of that in the current development plan.</p> | Amend 6.5.2. a                    |

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|                             | <p>considering impacts upon overlooking and noise. Where appropriate, planning conditions will be used to restrict the use of the terraces to office use only and restrict hours of use.</p> <p>C. Where planning permission is required for changes of use at the ground floor level of office buildings, flexibility for a range of commercial uses (including retail, entertainment, medical and leisure) will be supported in principle, subject to the policy requirements set out in Policy BEL9.</p> <p>D. Development proposals should consider how they can maximise opportunities for carbon savings and biodiversity, particularly by way of improvement to plant and machinery, building materials and introduction of appropriate greening. Any proposals will need to carefully consider impact upon residential amenity (including noise and vibration), design and heritage. Proposals for any urban greening/planting should be accompanied by the submission of a management strategy which sets out how the greening/planting will be maintained in perpetuity."</p>  |  |                                   |
| Grosvenor                   | <p>Sustainability and Biodiversity</p> <p>We appreciate that the draft Plan recognises the importance of sustainability in its proposals to improve biodiversity and to reduce traffic, thus improving air quality. There is also reference within the Vision to "sustainable growth", which is welcome. Grosvenor is committed to ensuring that our development champions environmental leadership, and we have long term ambitions that by 2050 we will be a climate positive, regenerative business, actively creating environmental benefits from our activities.</p> <p>We consider that the draft Plan should challenge itself in respect of sustainability and biodiversity. There is a commitment, both within the London Plan, and Westminster's City Plan, for development coming forward to be sustainable. London Plan Policy S12 requires major development to be net zero carbon. One of Westminster City Plan's objectives within the spatial strategy (Policy 1) includes adapting to and mitigating the effects of climate change. The Environment Act calls for improvements made in support of the 10% net biodiversity gain to be supported for 30 years. There should be a consideration of this amongst the focus on maintaining green features.</p> <p>The Plan should consider, if not actually mandate, environmental elements in the context of design principles for new development or redevelopment of existing buildings (including materials), and in its vision for character areas, refurbishment of buildings and shopfronts, as well as within the Pillars of the Plan.</p> | <p>It is difficult for a Plan to 'consider, if not actually mandate' certain environmental design principles. Ultimately policies have to be clearly worded and flexible. To suggest that certain materials are used limits flexibility, not least within the context of the heritage of Belgravia's building stock. Over the lifetime of the Plan, materials and techniques for reducing the environmental impact of buildings are likely to change and we would want to avoid restricting innovative ways that the carbon footprint of buildings could be reduced. The requirement for biodiversity net gain is reflected in the Plan and BEL12F identifies specific ways that built development can provide green infrastructure.</p> |                                   |
| Grosvenor                   | <p>The introduction of Policy BEL4 is welcome although we consider adjustments should be made to the wording of the policy to recognise that it is likely to be necessary to balance the environmental</p>   | <p>The suggested removal of reference in BEL4A to safeguarding historic</p>  |                                   |

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|                             | <p>performance of buildings with their historic characteristics. We believe that this issue will present a particularly acute challenge for Belgravia over the coming years given the nature of its building stock, and therefore we suggest this policy is amended as follows:</p> <p>A. "The sensitive retrofitting of energy efficiency measures in historic buildings will be encouraged, including the retrofitting of listed buildings and buildings in Conservation Areas.</p> <p>B. The reductions in air pollution, noise pollution, water and electricity use, and carbon emissions realised will be treated as public benefits and weighed against any heritage harm caused to heritage assets.</p> <p>C. Where harm is identified, applicants shall demonstrate that that harm is the minimum amount necessary to achieve the public benefits arising."</p> | <p>characteristics would mean the application of the policy entirely rests with a judgement of what is 'sensitive'. This provides insufficient assistance to the decision maker. Regarding BEL4B, it is not appropriate for a plan to pre-determine what should be treated as public benefits in respect of heritage assets. This would mean that the policy would not meet the Basic Conditions.</p>   |                                   |
| Grosvenor                   | <p>We also consider that there should be policy encouragement (perhaps within Policy BEL1) for the use of innovative materials and approaches to sustainable and biodiverse design – we appreciate that this is referenced within the Design Codes, but given the importance of sustainability, we would suggest that this should specifically be included within the policy wording.</p>   | <p>The word 'innovative' could open up materials that are not appropriate. Design Code 8.6 already reflects the need for sustainable materials.</p>   |                                   |
| Grosvenor                   | <p>In terms of active travel and promoting zero-carbon alternatives to transport, there should be the promotion of cycling as an alternative to vehicular travel, with the encouragement of additional cycle parking. Whilst some changes have been made to the draft Plan since previous versions in this respect, we remain of the view that the Plan could go further than it currently does. Policy BEL1 could be amended to include policy encouragement for the optimisation of sustainable modes of travel within development proposals and public realm proposals, where relevant and feasible.</p>   | <p>Given that the City Plan already encourages and has standards for the provision of cycle parking, the Neighbourhood Plan could only be effective if it identified locations for public cycle parking. However, this was not a matter raised by the community.</p> <p>It is unclear, in a Central London location where nearly all new development is expected to be car-free, what 'policy encouragement for the optimisation of sustainable modes of travel' in BEL1 will add to the existing development plan.</p> |                                   |
| Grosvenor                   | <p>Throughout the draft Plan reference is made to relevant policies contained within Westminster's City Plan and the Mayor's London Plan. This can be helpful to frame the draft policies, however, in</p>  | <p>The Forum disagrees that 'retain and enhance' is a different requirement</p>   |                                   |

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|                             | <p>some instances the Plan paraphrases some of the adopted policies and changes the nuance of the policy wording. For example, draft Policy BEL5 part A states:<br/>           "As required by Policy 40 (Townscape and Architecture) of the Westminster City Plan, development proposals affecting local views of significance must demonstrate that they retain and enhance the quality of the views and remedy past damages to these views where possible." (Our emphasis added).</p> <p>However, City Plan Policy 40 (Part F) reads:<br/>           "New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible." (Our emphasis added).</p> <p>'Retain and enhance' is a different requirement to 'contribute positively'. We feel that this is an important distinction to make as our view is that 'retain' suggests that the views should remain in-situ, which would not be in the spirit of positive plan-making for growth.</p> | <p>to 'contribute positively'. It is, at best, extremely doubtful that a development proposal could diminish a view in some way – in terms of the ability to see the aspects which make the view special – whilst still contributing positively to it. The minimum requirement is to retain the view and applicants are encouraged where they can to enhance it.</p> |                                   |
| Grosvenor                   | <p>Another example is at draft Policy BEL6, which refers to proposals affecting Local Buildings of Merit to meet the requirements of City Plan Policy 39 (presumably Part R relating to Non-Designated Heritage Assets). The justification to the Policy quotes and endorses the CAA in saying that the demolition or unsympathetic alteration of these buildings will normally be resisted. This does not tie in with City Plan Policy 39 which actually states:<br/>           "When assessing proposals affecting non-designated heritage assets, a balanced judgement will be made regarding the scale of any harm or loss of the asset and the benefit of the proposed development."</p>  | Noted  | Amend 5.8.2                       |
| Grosvenor                   | <p>We also note that there are some examples in the Plan (e.g. Non-Policy Action 2), where the draft Plan suggests that the Forum will work with the City Council to establish 'principles'. We suggest that these references are removed as their role is confusing and ultimately the determination of any planning applications, and assessment of principles and planning balance judgements, would lie with the City Council.</p>   | <p>These are non-policy matters that the Forum wishes to explore. It is unclear how or why their role is unclear.</p>  |                                   |
| Grosvenor                   | <p>Contractors<br/>           Non-Policy Action 3(A) states that the Forum will seek to work with the City Council to adopt a 'model contract framework' to guide owners and contractors. 3(C) states that applicants for schemes below the Code of Construction Practice threshold will be encouraged to voluntarily demonstrate commitment to the Code, including ensuring that the contractor meets specific requirements including being a UK registered entity. 3(D) states that any works to highways (e.g. erection of scaffolding) should be carried out by the City Council, as opposed to a developer. Whilst</p>  | Noted  | Amend Non-Policy Action 3         |

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|                             | <p>we are committed to ensuring our appointed contractors are considerate and carry out any works respectfully, it should not be the role of the planning system to dictate how commercial contractual matters should be negotiated and agreed. Nor should the draft Plan dictate who carries out certain works. We also question how this would work in practice.</p> <p>The purpose of Non-Policy Action 3 appears to be to support Policy BEL3 in its aim to ensure that building works will preserve residential amenity. We consider that Policy BEL3 (as well as the City Council's policies/guidance on construction) goes far enough in this regard and therefore suggest that Non-Policy Action 3 be removed.</p>   |  |                                   |
| Grosvenor                   | <p>Shopfronts</p> <p>Policy BEL7 relates to shopfronts, and sets out that new/refurbished shopfronts must demonstrate how they reflect the relevant Design Codes. Whilst we agree in general with the intention behind this policy, this does not allow for any instances where more modern shopfronts may be appropriate.</p> <p>This should be amended.</p>  | <p>The Design Codes do not prohibit modern shopfronts, rather they require the character to be reflected. Therefore shopfronts should be in keeping with the building they are in. If a new building is informed by the Design Codes and reflects the character then, by definition, the design of the modern shopfront will be appropriate as well.</p> |                                   |
| Grosvenor                   | <p>Appendix F</p> <p>The extent of the Grosvenor boundary shown on the plan in Appendix F is incorrect. We enclose at Appendix 2 of this letter an Estate boundary plan and we ask that Appendix F is updated to reflect these boundaries.</p>   | Noted  | Amend Appendix F                  |
| Knightsbridge NF            | <p>Building refurbishment and enlargement and local construction activity (Policy BEL3 and Non-Policy Action 3): The impact of construction is an issue common to the residential areas of Knightsbridge and Belgravia. We support the BNP's proposals seeking to address it.</p> <p>Whilst the Westminster Code of Construction Practice ("CoCP") provides good core guidance on construction, the BNP could go further by encouraging Level 3 projects – the most common type in Belgravia – to meet the key requirements of Level 2 projects. These requirements are listed in Table 1 of the CoCP and include lorry management and routes, noise and vibration monitoring and air quality monitoring. Also, the provision of easier ways of contacting construction companies to raise issues could be encouraged.</p> | Agreed   | Amend Non-Policy Action 3         |

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| Knightsbridge NF            | The BNP should 'encourage' the Council to update their standard planning condition for construction so that it ties directly to the Council's new CoCP. The BNF may also benefit from having its own 'Best practice guidance on construction standards and procedures' along the lines of the KNF's published version: <a href="https://www.knightsbridgeforum.org/best-practice-guidance-construction-standards-and-procedures/">https://www.knightsbridgeforum.org/best-practice-guidance-construction-standards-and-procedures/</a> .                                    | Agreed   | Add best practice guidance on construction standards and procedures |
| Knightsbridge NF            | Retrofitting historic buildings for energy efficiency (BEL4): This policy is excellent and recognises that the majority of development activity in a neighbourhood such as Belgravia will relate to historic buildings but that this should not excuse the importance of meeting the highest environmental standards. The policy could go further by suggesting ways that the requirements of the policy could be achieved. Please refer to the 'made' Knightsbridge Neighbourhood Plan ("KNP") Policy KBR36.   | Agreed   | Amend BEL4  |
| Knightsbridge NF            | Late night uses in the Neighbourhood Area (Policy BEL9): This policy is strongly supported and we note the introduction of new national planning practice guidance relating to new hot food takeaways having to make sufficient provision to minimise litter (PPG Paragraph: 013 Reference ID:53-013-20220807). Policy BEL9B.c. could be expanded to require applicants for new hot foot takeaways to submit a plan for managing litter. The BNP may wish to refer to 'intensification' which is an issue currently being tested at planning appeal in relation to the KNP. | Agreed   | Amend BEL9B c   |
| Knightsbridge NF            | Trees and greening (Policy BEL12): This policy is excellent. It could be strengthened by making more explicit reference to the preparation and application of Tree Management Plans. The BNP might also resist plastic greening as the KNP does. Trees and plants need to be resilient to climate change, diseases and pests. The BNF may wish to favour 'green roofs' over 'green walls' as they are more practical. Please see the KNF's 'Best practice guidance on Tree Management Plans'.   | The danger of preferring one thing over another is that you never get both. However, the point is noted and will be reflected. | Amend BEL12   |
| Knightsbridge NF            | Major development sites (BEL14): The KNF supports this approach and the recognition of important issues for major development sites such as design, heights and permeability. The BNF may wish to consider the value of adding in encouragement for such developments to meet the highest environmental standards including zero air emissions as soon as possible.   | Agreed   | Amend BEL14   |
| Knightsbridge NF            | The BNP emphasises the importance of effective engagement with the community by development. It is encouraged to create a best practice guidance for this which could be referred to in the BNP. Please refer to the KNF's relevant best practice guidance which accompanies the KNP: <a href="https://www.knightsbridgeforum.org/best-practice-guidance-community-engagement/">https://www.knightsbridgeforum.org/best-practice-guidance-community-engagement/</a> .   | Agreed   | Add best practice guidance on effective community engagement'       |
| Knightsbridge NF            | The BNF is encouraged to use the BNP to push for all development to achieve zero local and total air emissions as soon as possible and ensure no deterioration in local air quality. Please refer to the  | Reference has been included to zero air emissions in respect of Policies   |   |

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|                             | 'made' KNP (Policies KBR34 and KBR35) and the Fitzrovia West Neighbourhood Plan. The KNP offers relevant examples if you wish to develop the reasoned justification text to explain or support your policy. It will also provide relevant definitions in its glossary e.g. to define "Zero Local Emissions" and "Zero Total Emissions".  | BEL4 and BEL14. Coupled with existing higher level policies, this is considered to be sufficient.  |                                   |
| Knightsbridge NF            | The KNF would draw the BNF's attention to the importance of curbing inappropriate advertising, particularly in phone boxes. Whilst all the phone boxes in Belgravia may be protected by listing, the BNP is encouraged to take the opportunity to recognise their heritage value and how detrimental modern advertising is to that status.   | All the phone boxes in the Area are listed. Whilst the principle is supported, this is not an issue that has been raised by the community.   |                                   |
| Resident                    | Summary: There has been no direct consultation with the Victoria Business Improvement District which other than Grosvenor, represents more businesses within the BNF footprint than any other organisation.  | The Forum has sought to engage extensively and has sought to make the BID aware that the Plan was being prepared. As a residential-led neighbourhood plan, the Forum has focused on establishing the issues of importance to the residents and then addressing those with other stakeholders as appropriate. Commercial matters mainly concerned activity away from the BID area therefore it was not considered necessary to directly contact interests representing businesses in this part of the Area. |                                   |
| Resident                    | 2.1: The open space is known as Hyde Park Corner rather than Constitution Hill (see your Figure 5.1). Before the separation of Hyde Park Corner from The Green Park, the road under the arch was part of longer roadway, Constitution Hill, which otherwise runs between Hyde Park Corner and the Western end of the Mall. At most the roadway, and not the whole area, could be described as Constitution Hill. | Noted  | Amend 2.1                         |
| Resident                    | 2.2: Manor of Eye: It was listed as the Manor of Eia within the Domesday Book.   | Noted  | Amend 2.2                         |
| Resident                    | 2.2: Typo - Medieval   | Noted  | Amend 2.2                         |
| Resident                    | 2.2: The Cundy plan was based upon the James Wyatt plan of 1819. Being succeeded by his son and grandson as The Estate Surveyor, he was later known as Thomas Cundy I.   | Noted  | Amend 2.2                         |

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| Resident                    | 2.2: Previously the site of Grosvenor Dock, part of the Grosvenor freehold. Pre-pandemic, Victoria mainline station was 80m passengers p.a; including the underground, buses and coaches it was nearer to 130m p.p.a.  | Noted  | Amend 2.2                          |
| Resident                    | 2.3, CAA: This document, which 9 years ago was subject to numerous comments and observations when it was published, has never been formally adopted. It is questionable the extent to which it should now be relied upon to support the Neighbourhood Plan.  | The Forum has been mindful of the fact that the CAA was not adopted and that it was prepared some years ago. In this regard, the information contained in it that has informed the Plan has been 'sense checked' using local knowledge and only applied if still relevant.   |                                    |
| Resident                    | 2.3: The Grosvenor Belgravia Estate Management Scheme (BEMS), established by the High Court in 1973 pursuant to s19 of the Leasehold Reform Act 1967 ('the Act'), applies only to those residential properties that Grosvenor have sold subject to the Act. Leasehold and commercial properties are covered by the terms of the leases and some non-Grosvenor freehold properties, such as Ebury Square and 38 Eaton Place, are specifically excluded from the Scheme. | Noted  | Amend 2.3                          |
| Resident                    | 2.3: The integration of VCS within Future Victoria is not an option that is being actively considered. Other than issues related to the Inner Ring Road, connectivity within Future Victoria is focused on pedestrian rather than vehicle movement.  | Noted  | Amend 2.3                          |
| Resident                    | 2.4: It would be worth including the Crossrail 2 safeguarding maps within the Plan.  | Agreed   | Add new map at end of Section 2.3. |
| Resident                    | 3.2: There is no presumption in favour of growth and no indication or target numbers for the preferred uses for those areas, particularly on the boundaries, which may be subject to redevelopment.  | There is nothing in planning/the NPPF requiring a 'presumption in favour of growth'. The NPPF has a presumption in favour of sustainable development' (para 11). The plan is therefore not required to plan for growth in terms of establishing growth requirements (target numbers) for sites – that is being addressed through the WCC Site Allocations DPD. |                                    |

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| Resident                    | 5.1: The desire to have the 'outer margins' which are outside the Conservation Area designed as Belgravia buildings is not substantiated or justified. These buildings on these arterial roads, Knightsbridge, Grosvenor Place and Buckingham Palace Road, shelter the inner area and just as Park Lane or Oxford Street frontages are different to and larger than the buildings within Mayfair, so too can be the buildings on the borders of Belgravia.   | It is recognised that the periphery of the Area does relate to adjacent areas that are very different in character. Additions will be made to the Design Codes report to acknowledge this.  | Add section on peripheral sites to the Design Codes report |
| Resident                    | 5.2.1: Reference could also be made to the Grosvenor Specification which alongside the BEMS, mandates materials, colours, workmanship and other standards to be used on all Grosvenor properties whether covered by the BEMS or the leases.  | Agreed  | Amend 5.2.1  |
| Resident                    | 5.3.1 a: These are only listed if they are within the curtilage of an adjoining listed building – none are listed on their own merit.  | Noted   |  |
| Resident                    | Fig 5.2: The map has a number of inconsistencies/inaccuracies. The southern part of Wilton Mews has been excluded and yet the northern part, which is WCC highway, has been included while Montrose Place and Headfort Place, which are both WCC mews, have also been excluded. Eaton Close, a new build mews development has been included but Ormonde Place and Little Chester Street have been excluded.  | Agreed  | Amend Fig 5.2  |
| Resident                    | Fig 5.3: The map included the Alfred Tennyson so there are 3, rather than 2, pubs in Kinnerton Street.   | The address of the Alfred Tennyson pub is actually 10 Motcomb Street. However, this will be clarified.  | Amend 5.3.1. b   |
| Resident                    | Fig 5.4: It's surprising that you fail to mention but include Ebury Bridge House, a building identified as making a negative contribution within the draft conservation audit, within the boundary of the Barnabas Triangle.   | Ebury Bridge House forms a logical part of the triangle. Whilst it makes a negative contribution, the requirements of the policy will make sure that any redevelopment retains and, where possible, enhances the overall character of the area.       |  |
| Resident                    | 5.4.1 & 5.4.2: This is a Neighbourhood Plan for Belgravia and just as other Plans should not seek to dictate what happens in Belgravia, so this Plan should not seek to dictate planning policies in other neighbourhoods – that is the role of other forums and of Westminster City Plan. While the Forum may make representations on proposals outside their boundary, it is ultra vires for them to try and control them. The proposal that new buildings should not exceed the height of surrounding existing buildings is contrary to the City Plan and potentially unworkable. | The Plan is not seeking to control matters outside its boundaries and the Forum is fully aware that this is not possible. The Plan does not have a policy addressing heights, nor does it have any proposals that new buildings should not exceed the |  |

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|                             |  | height of surrounding existing buildings.  |                                   |
| Resident                    | 5.5.2: The preference for the 'addition of upper floors and mansards' over basements is at odds with 5.4.2. Arguably, once a basement has been built it will never be seen while a roof extension will always be visible and the easiest places in which to build basements are under 2 storey mews houses rather than under 5 storey terrace houses which already have lower ground floors.   | The Forum disagrees and does not consider it necessary to amend the text and this does not relate specifically to a policy in the plan.  |                                   |
| Resident                    | 5.5.3: While I have great sympathy for these aspirations, they are not appropriate for a Neighbourhood Plan. Far better to work with WCC on the CoCP and with Grosvenor on their own conditions of approval  | These are matters of importance to the local community and it is considered appropriate to have a policy where it can align with the CoCP.   |                                   |
| Resident                    | BEL3: The construction method statement and traffic management plan are approval of detail documents which can only be prepared once a contractor has been appointed, rather than when a planning application is submitted. If you are requiring regular community liaison to be undertaken then the methodology should be specified by the Forum.   | Agreed   | Amend BEL3                        |
| Resident                    | Fig 5.7: It is not sufficient to simply adopt the views proposed by the outdated draft Conservation area audit. There needs to be specific, updated, justification for each view.  | Disagree. These views were identified and justified through the process of preparing the CAA which WCC considers is still relevant. The fact that the views were identified some time ago does not diminish their value. |                                   |
| Resident                    | 5.8.1: 37 & 49 Belgrave Square are listed Grade II*, not Grade I. it would be worth highlighting all the Grade II* properties which includes most of Eaton Square and part of Eaton Place amongst others.  | Noted  | Amend 5.8.1                       |
| Resident                    | Fig 5.9: This is a very misleading map – it would be better to mark it up building by building – as the map included within the design code does. However that map also contains errors – for example, 24 Belgrave Square is Grade I listed, not Grade II*. There are a number of buildings, such as in Eaton Terrace and South Eaton Place, that were bombed in the war that were then rebuilt to match the original. Care needs to be taken not to seek listed status for these replica buildings. | According to Historic England, 24 Belgrave Square is Grade I listed, with its railings and gates being grade II* listed. The map is therefore considered to be correct as it uses the GIS data from Historic England.    |                                   |

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| Resident                    | Fig 5.11: It would be interesting to understand the criteria for including Little Chester Street (standard speculative 1960's housebuilding development) while not including, for example, new buildings by famous architects such as Zaha Hadid and John Pawson or refurbished buildings such as Newson's Yard. 10 Montrose Place would be another potential building of merit.   | As stated above Fig 5.11, a list of the buildings with relevant commentary is shown in Appendix E.   |   |
| Resident                    | 5.11: There have been numerous studies over the years on the landscaping and access to HPC which the Plan should reference, specifically by English Heritage, TfL, WCC and others in c.2000 prior to the installation of the Australian and New Zealand memorials. There is a complicated ownership structure on HPC which the Plan needs to acknowledge.  | Noted  | Amend 5.11                                    |
| Resident                    | 5.12: In view of their age and the representations that were made on the original drafts but not incorporated, the draft audit and proposed extensions to the conservation area need to be reviewed, revised and re-consulted upon before adoption.  | Disagree and the fact that representations made on the original draft but not accepted does not mean that the updated version of the CAA must be reviewed.                                     |   |
| Resident                    | 6.3.2: This policy and its justification contain misleading and incorrect misinformation about events in the gardens which have all been held for the benefit either of residents or the wider local community – it is clear from what has been written that there has been no consultation with, for example, the Belgrave Square Garden Events Committee.<br>The 1931 Act, Section 3 (1), states that protected squares can only be used for “authorized purposes” including, “ornamental garden, pleasure grounds or ground for play, rest or recreation.” Provided garden events are properly licensed (which is not a matter for the Neighbourhood Plan) and the activities fall within the Act then the Plan should have no jurisdiction or influence over their use. Unless substantially re-drafted, this paragraph, including Non-Policy Action 9, should be deleted in its entirety. | The point about commercial use is noted and will be amended. However, whoever events are for, they can create a lot of inconvenience for residents. The survey illustrates this.               | Amend Non-Policy Action 9 and supporting text |
| Resident                    | 7.5.1: Interesting to reflect that there are almost 3 times as many people working in Belgravia as there are living there.   | Noted  |   |
| Resident                    | 6.6.2: While the intention to seek ACV's is well intentioned, on the basis that they only last for 5 years it would be more pragmatic to apply for an ACV when the pub is under threat – i.e. during the marketing period or if a planning application was to be submitted.  | Disagree. An ACV is also a material consideration when a planning application is considered therefore there is considerable merit in having it in place before any application is forthcoming. |   |

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| Resident                    | 6.8: In addition to designing out crime and anti-social behaviour, it would be worthwhile making sure that Hostile Vehicle Mitigation is sensitively installed – increasingly important with alfresco dining.   | Agreed   | Amend 6.8                         |
| Resident                    | 7.3: All trees with a trunk diameter greater than 100mm with a conservation area are already protected and require WCC approval even for minor pruning. In view of Tree Preservation Order requirements and the proposal that WCC's 'Trees in the Public Realm' strategy should be adhered to, the Plan's proposals for trees appear to offer no new policies. Policies BEL12 A-D would appear to be superfluous as a result. For BEL12 E, reference to guidance provided by the Tree Design and Action Group <a href="https://www.tdag.org.uk/our-guides.html">https://www.tdag.org.uk/our-guides.html</a> would be more useful and appropriate perhaps than the WCC guidance. | Noted, although the reference to two different sources of guidance demonstrates that it is easy for applicants to be confused as to what is required of them. Applicants require clarity and the policy seeks to provide this whilst bringing in other considerations of the role of trees, e.g. biodiversity, heritage and townscape. | Amend BEL12                       |
| Resident                    | 7.4: The standard stucco colour in Belgravia is British Standard Colour 08B15 with a gloss finish. To ensure consistency, it would be worth including this as a requirement within the Plan and/or design code.   | Agreed   | Amend Design Codes                |
| Resident                    | BEL13: Within the Conservation Area, limestone (York Stone) should be mandated for pavements – not the concrete paving stones currently being used by WCC in Ebury Street. I have never seen a sympathetic cycle storage hangar for the streets – if you have examples they should be illustrated.  | It is not reasonable or appropriate to require all pavements to use a single type of stone.<br>The requirement for sympathetic design is precisely because of the lack of good examples. A storage hangar that is a good example elsewhere may not be suitable in Belgravia.   |                                   |
| Resident                    | 7.5: Traffic management is not within the remit of a Neighbourhood Plan. Notwithstanding, extensive modelling of traffic movements and options in Belgravia, Victoria and Chelsea was carried out in 2011 (Belgravia Traffic Management Study) which came up with a number of options to restrict through traffic and minimise congestion across the area.  | The point is noted but it is not within the remit of a neighbourhood plan policy. The plan does not present a policy relating to traffic management, only a non-policy action.   |                                   |
| Resident                    | Section 8: This should be a major part of the Plan but provides no guidance to developers. What mix of uses is the Plan proposing for these sites, how should public realm and connectivity be dealt  | The detail of what these strategic sites will be allocated for is a matter   |                                   |

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|                             | with, what are the carbon aspirations? What are the 'additional blocks and sites' identified by the Forum? This section requires a major review, extension and re-write.  | being addressed through the WCC Site Allocations DPD process. The Plan simply tries to provide a set of design principles that should inform the development of any of these sites.   |                                   |
| Resident                    | Neighbourhood Representation Panel: This proposal is, I would suggest, likely to prove unworkable and will inevitably lead to a variety of approaches across Belgravia. It also conflicts with the remits of the existing amenity societies. The section should be removed.   | This section expresses and intention to explore the potential for such a Panel. It will be for the Forum to consider this and one of the first matters will be to engage with amenity societies. The approach suggested reflects feedback from the local community on matters that would benefit from attention. The Panel therefore envisages filling a gap in evidence gathering and community liaison that many feel is currently missing. |                                   |
| Resident                    | Please note that Coleshill is referred to throughout as Coleshill House. This should all be changed to Coleshill Flats. Also, the number of units for Lumley and Coleshill should be increased to: Lumley 144 confirmed units, Coleshill 110 confirmed units, ( Fountain 89 , though some of those sold off).   | Agreed  | Amend section 6.2.2               |
| Resident                    | The word encourage should be replaced with the word ensure. Identifying buildings of architectural/historical merit is key to preserving the nature of Belgravia. It is truly disappointing that the Cundy Street flats, of immense architectural value, and positioned so considerately, with green/open space between the buildings is being lost, and replaced by taller, bulkier buildings. I applaud the intention of preventing further tall buildings being built in the area and the extension of the Belgravia Conservations area to encompass Cundy Street and Ebury Square. It is imperative that the level of Social Housing in the immediate vicinity is maintained or ideally increased. I would ask that in addition to constraining the height of new buildings, the footprint of the building is taken into consideration. This was not the case in the two newest developments on Ebury Street: Cundy Street and Ebury Square, both of which have/will eaten into the open air that surrounded/surround | There are certain matters that cannot be 'ensured' in planning policy; it is only possible to 'encourage' which is given weight when a planning application is considered.<br><br>Regarding the view of Ebury Square from Semley Place, it is not clear what the rationale is for its inclusion.  |                                   |

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|                             | <p>the original buildings. The recently rejected re-development of Kilmuir House is a prime example of new builds design intending to obliterate greenery that those using the pavements could previously enjoy. I have an interesting audio clip of abundant birdsong adjacent to the Cundy Street redevelopment (prior to the work starting) compared with the striking silence and lack of birdsong adjacent to Ebury Square development. As far as the Local Views are concerned, I would ask that the view of Ebury Square enjoyed from the corner of Semley Place and Ebury Street be conserved. This is thanks to the mercifully single storey aspect of the Shell Petrol Station, allowing a clear and glorious view of Ebury Square Gardens - something that is/will be obliterated from all other corners due to building footprint and height etc etc etc. I am grateful to everyone involved in producing this document and for their ambitions.</p>  | <p>Currently the view is created by the open vista afforded by the petrol station forecourt. Any alternative development is almost certain to be unable to retain the open feel. The view is not considered to be of such significance that it can effectively be used to sterilise development.</p>   |  |
| Resident                    | <p>A very few comments... when talking in the introduction of the well established village feel I wonder if you could include a brief reference to the Belgravia Churches? They are the defining centre of any village and that they survive and prosper in Belgravia is I think an important point about community. Further into the text you address the importance of pubs then Churches...it might be seemly to reverse this order? Design/New Build is covered very comprehensively. I think that we are lucky that so much post war building has been in the spirit of Belgravia at least superficially. However if one looks more carefully at say Chester Row and the surrounding terraces they are poorly detailed... the bricks seem the wrong colour, the proportions are not happy and the windows incorrectly detailed etc. It is very often this matter which gives otherwise contextual buildings a bad name and can we be more definite on this? It is deeply dispiriting that we cannot find any good case studies in Belgravia but could Eccleston Yard be cited as an imaginative re use of existing buildings? Chelsea Barracks was I think the hand of more than one architect and the gardens by Kim Wilkie taking reference from a typical gardens square are the perfect setting for the new buildings. Jumping around I think it very important that Hyde Park Corner be declared a saturation zone. The ANZAC memorials do it little credit. A slightly controversial matter...a lot of those basic food shops which we all treasure often close because residents do not use them. Could a gentle reference to this be made in the text?</p> | <p>Reference to churches will be strengthened in Section 2 and the order of sections 6.6 and 6.7 (pubs/churches) will be reversed.</p> <p>The importance of correct window size, style and placement will be emphasised in the Plan and the Design Codes.</p> <p>The point about use of shops is noted. This will be reflected in Section 2.3.</p> | <p>Amend Sections 2 and 6.6/6.7.</p> <p>Amend Design Codes</p> <p>Amend Section 2.3.</p> |
| Resident                    | <p>Thank you again for letting me have a hard copy of the Belgravia Design Codes. I consider it to be an exemplary document in every respect. It will be an invaluable manual for future changes in Belgravia and the analysis of both the context and every aspect of the historic built environment is scholarly but not in the least impenetrable which is often difficult to achieve. The presentation and layout is likewise of the highest quality. It is exactly what Belgravia needs to ensure that all future</p>  | Noted  |  |

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|                             | work will conform to a clear criteria. You already have my substantive comments on the overall Plan. The only addition which I have to those is under precedents/exemplars. The only new ( ish ) building which now comes to mind is that which stands on the site of the old police station on Gerald Road designed by Liam O'Connor. It blends perfectly with its context and the quality of its design is matched by its materials which look as crisp today as when it was first built.  |   |                                   |
| Resident                    | I have read the Neighbourhood Plan and I congratulate the Forum and the plan authors on an extremely good piece of work. As a resident of Kinnerton Place South, I support the plan's observations about Kinnerton Street. I would also ask, if the plan can have influence on this, that traffic in Kinnerton Street should be restricted, especially to large vehicles which sometimes get stuck on the street. I support that plan's observations about potential developments at Victoria, e.g. Crossrail 2. These would be strongly detrimental to the area.  | Traffic management is not a planning matter so cannot be addressed in policy. Without a full survey of streets to identify a list of priorities for traffic management, it would be inappropriate to mention a single street.   |                                   |
| Resident                    | Excessive focus on areas around Pimlico Road and St. Barnabas. These areas are atypical of Belgravia (and stem from a distinct period of urban development). It is incongruous to dedicate so much of the report to shoehorning these "foreign" buildings into what is otherwise a uniform, contemporaneous development. everything south of Ebury street is essentially lost to the character of Belgravia. It would make sense to give these areas over to commercial development (including the coach station) and focus on the core of Belgravia. There is no real need for commercial activity within Belgravia, including restaurants. As noted, it is surrounded by increasingly attractive commercial developments, all within walking distance. The historic pubs can be maintained and perhaps less competition will support their viability. The plan does not lend enough attention to traffic and mobility issues. More should be done to promote walking and cycling. Moreover, more and more residents are doing without cars and the plan should take steps to actively promote this. There is a real need for a pedestrian crossing at the junction of Grovesnor Crescent and Duke of Wellington Place. The pedestrian subways around Duke of Wellington Place are unattractive and threatening, moreover, they mostly do not accommodate the natural direction of pedestrian traffic (leading to their lack of use). Given the increasing amount of tourist foot traffic in the area, it might be considered to develop/move the passageways and combine these with commercial spaces below ground level (perhaps not subterranean, but below the line of site). More cycle routes are necessary, notably for Grovesnor Place (where cyclists are increasingly riding on the pavement). A subterranean passageway for cyclists within Duke of Wellington place might usefully form part of the redevelopment of the Hyde Park Corner area. As fewer residents have cars, there is now an excess of parking space in Belgravia. Areas allotted for parking could be converted to cycle lanes or | Traffic management is not a planning matter so cannot be addressed in policy. The plan is supportive of walking and cycling which is already a clear policy requirement of the City Plan and London Plans (which now do not allow any car parking provision for most new developments in the area). |                                   |

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|                             | given over for the planting of trees. There are too many taxis (black cabs) using Belgravia either as a short cut or as a waiting zone. The demand for taxis by residents is minimal, particularly given the availability of Uber/Bolt etc. The number of parking spaces provided for taxis should be reduced. A considered plan of one way streets could be introduced to reduce the viability of Belgravia as a through route.it is surprising that there is not any plan to reduce emissions in the zone   |  |                                   |
| Resident                    | Like many other resident families, we very strongly disagree with yet another restaurant in Elisabeth Street.   | The Plan is not actively promoting more restaurants in the Area. Elizabeth Street is designated by the City Plan as a Local Centre and the Neighbourhood Plan cannot override that. Policy BEL9 seeks to manage uses that could have an impact on residential amenity. |                                   |
| Resident                    | Stop Grosvenor turning Belgravia into a housing estate for rich foreigners. Stop them knocking down perfectly good homes so that they can build more expensive homes to be used as money making empty blocks such as 1 Ebury Square.. Kilmuir House at the corner of Ebury Street and Eaton Terrace has over 50 two bedroom flats , all in good condition that could be used by WCC. Cut the new Walden House down to the current height.   | Noted  |                                   |
| Resident                    | <b>What are your overall views about this Draft Plan?</b> In general it covers things that are important to me. Restoring empty properties. <b>What, if anything, do you think is missing from the Plan?</b> Preserving original pavements and coal holes. More dog poo pins to encourage their use   | The requirement to retain high quality paving is addressed in Policy BEL13. Coal hole covers will be added to BEL13. More dog waste bins are already identified as a possible priority for Neighbourhood CIL funds.  | Amend BEL13                       |
| Resident                    | <b>What are your overall views about this Draft Plan?</b> I think it is vital that the character of the area is maintained, that small local businesses are encouraged , that Belgravia isn't over developed and that more attention is given to residents not having multiple building projects working concurrently in the street , builders using parking bays that should be for residents ,cars damaged because of large vans parking over the resident bay lines . that the noise and nuisance to residents is minimised . Unlike now when there are currently 3 major projects in the street, and behind in the street we back onto several more and the church development . The summer when we want to use our gardens and homes is constantly disturbed , we cannot find parking spaces because of builders | Noted  |                                   |

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|                             | <p>.Today 7 vans relating to the works. Belgravia needs to be residential with people living in the houses not just occasional use and encouraged to have gardens because concreting over and building on the gardens means no water run off putting us all in danger of flooding and not helping the air and general ecology of the area . Maintains village feel . <b>What, if anything, do you think is missing from the Plan?</b> This is meant to be a clean air zone but constantly builders and personal drivers sit with their engines chugging out pollution for long periods and there is not enforcement of this rule . Likewise noise enforcement at night . Limit number of major works in any one time , prevent sub basement ( ice burg) developments there is no week where a development doesn't take place in this small section of street over every year I have lived here ( 27 years ) <b>Is there anything else you would like to tell us?</b> I have lived here for nearly 30 years and while there is still a sense of community , more and more other people only occasionally use the houses as homes and each time people buy the house it is gutted over a couple of years and then when resold , completely gutted again and this happens multiple times . Green space needs to be encouraged within the garden areas of the houses not over developing what should be the garden area with more buildings - causing noise pollution and preventing water run off when it rains . This will cause further flooding as we saw last year .</p> |   |                                   |
| Resident                    | <p><b>What are your overall views about this Draft Plan?</b> I cannot iterate enough how important it is to retain the Neighbourly Feel of the area, specially at night. Your point 6.1.1. about having peaceful nights, and also the likelihood that the Al Fresco Covid Schemes are likely to become permanent are at contradictions to each other. I feel that we are at that tipping point where Belgravia residents are at a significant disadvantage because the increased restaurants and all associated traffic/supplies/etc have begun to infringe significantly on these 'peaceful night's. Belgravia is in danger of losing its residents .. <b>What, if anything, do you think is missing from the Plan?</b> How do we limit the encroachment of even more eateries into limited space where the current infrastructure is not enough to support it?</p>  | <p>The point is noted and a balance needs to be struck between outdoor dining/drinking and residential amenity. Policy BEL9 is considered to address this satisfactorily.</p>   |                                   |
| Resident                    | <p><b>What are your overall views about this Draft Plan?</b> My daughter attends St Peter's Eaton Square Primary School on Lower Belgrave Road. The street is currently undergoing some works to convert it into a "school street". This means closure to through traffic during school drop-off and pick-up and converting the street into a one-way street in order to reduce traffic flow. This change is a result of the findings of an air quality audit which found air quality to be extremely poor. Sadly the council's plans do not include any street greening which would have further improved air quality and the lived environment for pupils and residents. The school has been in discussion with Westminster City Council for a number of years to try and extend the school playground which is</p>   | <p>The area outside this school has already been modified by WCC in a recent traffic light removal scheme which included considerably widening pavements and narrowing the street. Moreover, this area is 'reserved' for potential Crossrail 2 works. Given these very specific</p> |                                   |

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|                             | <p>currently just 120 m2 for ~300 children aged 3-11. The school and parents had hoped that the school street plan would include some provision for a playground extension, however, this has not been forthcoming. This means children will continue to have to stagger their use of the existing playground, severely limiting the amount of time spent outside each day, as well as continuing to use the school hall for physical education. Our hope is that the Belgravia Neighbourhood Forum will lend its support to the school and encourage the council to be more innovative in its approach to providing our children with clean air and outside space. <b>Your Comments - Chapter 2</b> We are extremely concerned about the impact the proposed Crossrail 2 site will have on St Peter's school. If this were to go ahead the air quality would become even worse and the noise would make learning impossible. I suspect the school would be forced to close. <b>Your Comments - Chapter 7</b> Far more can be done to improve the environment in and around Lower Belgrave Street. We would like to see significant greening of the street and more permanent plans to limit traffic outside the school.</p> | <p>conditions affecting this street, it is not considered appropriate to cover this in the Plan, which aims to set out more general long term principles for planning.</p>   |                                   |
| Resident                    | <p><b>What are your overall views about this Draft Plan?</b> It's great but as someone who lives just outside the area and sends their child to school at St Peter's Eaton Sq Primary School I would like more included on the need to urgently tackle air pollution- for example by restricting on street parking on weekends and strongly support creating an adequate playground for the children at the school. <b>What, if anything, do you think is missing from the Plan?</b> More is needed on tackling air pollution and improving the environment near schools</p>   | <p>Air pollution is covered by the City Plan and London Plan and hence to reiterate in the Belgravia Neighbourhood Plan is not permitted.</p>  |                                   |
| Resident                    | <p>What are your overall views about this Draft Plan? My particular interest in the Plan is in the ways it might enhance the environment within which schools in the area operate and their children learn. Your Comments - Chapter 6 I feel that the thing that is missing from the Plan is something that gives more weight to the idea that Belgravia has more than just the feel of a village, but the spirit of one. I grew up in a village in Devon and attended the local village Church of England primary school. There the school was at the heart of the community and so I am surprised that in Section 6 there is not something specific about education and schools, and how planning can and should be used to better serve the school children in the area. I think that the ideas within the plan should be considered holistically in relation to this vulnerable group, so full of potential: to reduce health inequalities, ensure playground provision meets the needs of pupils and to promote a positive approach to mental health and well-being, in the immediate context of the schools and the wider environment of Belgravia.</p>  | <p>Various physical improvements have been made recently outside St Peter's School although it is recognised that there is always scope for improvement. The Forum has sought to engage as widely as possible with the community and welcomes the opportunity for dialogue with the school community. Certainly the availability of CIL funds creates the opportunity for specific issues to be addressed for the benefit of the community. This could include</p> |                                   |

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|                             | <p>Your Comments - Chapter 7 Section 7 has many ideas which could contribute to a better and healthier environment, such as tree planting and the greening of streets. However, ideas around the rationalisation of street furniture and signage, whilst desirable for residents and less visually confusing for motorists, can, if taken too far, become dangerous for the most vulnerable. For example, the removal of traffic lights at the Lower Belgrave Street/Ebury Street junction means that children returning to St. Peter's C of E Primary School in September, will no-longer have the protected access they once had. Prior to traffic lights there was a lollipop person. Other, similar schemes within Westminster, such as the one outside All Souls Primary School in Fitzrovia, have shown that the result is a rat run and motorists endangering pupils, as it is so easy to ignore signage restricting access.</p> <p>Your Comments - Chapter 9 I was very excited to read about the availability of CIL funding to the area's two Church Schools.</p> <p>What, if anything, do you think is missing from the Plan? As I said in my comment on Chapter 6, I feel that the Plan warrants a section dedicated to schools and the communities they represent. St. Peter's, for example, has almost one thousand members, including pupils, parents and teachers, and I think an active and ongoing dialogue between the area's schools and the Belgravia Neighbourhood Forum would be fruitful for the schools and the neighbourhood. The schools and the neighbourhood appear to have many goals in common. On 18th August, this year, Victoria Station flooded. Erratic weather patterns are predicted to become more frequent and many cities are rebuilding streets as "sponge" streets, using planting and soils, instead of concrete paving, to help mitigate the effects of flash floods. These kinds of streets are also softer environments for children and greener spaces for residents. Is there anything else you would like to tell us? Currently, Lower Belgrave Street, as it runs alongside St. Peter's Eaton Square C of E Primary School, is being rebuilt as a "School Street". The purpose of the school street is to tackle the health issues highlighted by The Mayor of London's School Air Quality Audit Programme of the school carried out in 2017. Whilst some of the recommendations have been included in the current scheme, those which have not been included, for example the greening of the street, tree planting and the improvement of the playground, would have chimed most with the The Belgravia Neighbourhood Plan. Recently, a parent-led working party has been created, answerable to the School Governing Board, to implement the remaining recommendations of the audit. To do this in dialogue with the Belgravia Neighbourhood Forum would be, I'm sure, fruitful for all.</p> | <p>projects that address issues relating to school access.</p> |                                   |

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| Resident                    | <p>I am the beneficial owner of [no.] Kinnerton Street. Thank you for giving me the opportunity to comment on the Belgravia Neighbourhood Plan 2022-2040. Having read the document it is very clear that you and the Committee have undertaken an extensive review, produced a voluminous document and created a thoughtful product. I am also personally very pleased with your Committee's views on Kinnerton Street.</p> <p>As such I only have 2 comments, one of a macro level and another of an extremely micro nature.</p> <p>1. The major issue is with reference to the statement made on the first Summary Page which states, in blue ink, "To conserve and enhance Belgravia's unique character....and to ensure it remains an attractive, vibrant and agreeable 'village' in the heart of London for those who live, work or visit there." That is exactly the problem. Belgravia has continued to deteriorate as a "village" over the past 15 years that I have lived in the Motcomb Street area. The main reason for that is the attitude, greed, ignorance and misunderstanding of this village concept by Grosvenor Estate. In my time we have lost the Barclays Bank, Good Life, Ottelenghi and other valuable, necessary stores. What have they been replaced with? Not shops that a resident requires but pop-up boutiques, women's fashion stores and outdoor restaurants. All businesses which draw tourists to the area but do not contribute to the village liveability of Motcomb Street and the surrounding area. I would suggest your study needs to work in conjunction with Grosvenor Estate to achieve the objective you have set for yourself. Perhaps Grosvenor could provide free or cheap rent to attract the businesses which residents require for daily living? It will enhance the value of their residential portfolio.</p> <p>2. In terms of Kinnerton Street, it's development has stopped at the public carpark entrance, which received a cobblestone finish years ago. May I suggest that the whole of Kinnerton Street be finished to the same standards? In particular, although the old Mews nature of some of the buildings are wonderful and should be preserved (eg Egg), the reality is that the street level direct entrances to those Mews houses have become dangerous, particularly in light of the speed at which vehicles drive on Kinnerton Street and the elderly nature of the residents. Maureen from Egg was hit by a speeding vehicle crossing in front of her store and hospitalized. Some residents have built structures on the road to distance the front door from traffic. One resident has even built a white picket fence and artificial lawn onto 4 feet of Kinnerton Street. This is all a long diatribe to suggest that a footpath on BOTH sides of Kinnerton Street may be appropriate. Although it would</p> | <p>1. These points are noted</p> <p>2. Replacing concrete paving with high quality paving stones is addressed as a priority for CIL in Section 9 (no. 7).<br/>The matter of speeding vehicles is noted. The provision of a new pavement on the east side of</p> |                                   |

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|                             | require the loss of a few parking spots on the bend towards The Nags Head, it would visually enhance the street and provide a much safer environment for the residents.  | Kinnerton Street would mean that all parking spaces would need to be taken out. The Forum is not aware that there is support for this from other residents in the street. However, this matter can be considered in future with the highway authority if there is the necessary support. |                                   |
| Member of the public        | I congratulate the BNF for producing a Plan which covers an extensive range of key issues for this historical area in Westminster. I respectfully request that the boundary should be extended beyond the designated area, to which the Plan relates. This is because despite the recent electoral boundary changes, the immediately adjoining area covering our building and Ebury Bridge Estate is left out and it is considered too small to have its own forum. At the very least, I would like to see the BNF influence the development of key major sites adjoining the Forum Area, incl. Ebury Bridge Estate, please. | Unfortunately it is not possible to change the Neighbourhood Area boundary at this stage. The Area was designated by Westminster City Council and therefore must be the area that the Plan covers.   |                                   |