



Historic England

Planning policy team  
Westminster City Council

Our ref: PL00793254

Date: 13/07/2023

By e-mail to:  
[neighbourhoodplanning@westminster.gov.uk](mailto:neighbourhoodplanning@westminster.gov.uk)

Dear planning policy team,

**Ref: Belgravia Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 version of this neighbourhood plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

There is much for us to support in this neighbourhood plan in its policy and guidance that will help to conserve and enhance the historic environment, from its detailed work on local views and buildings of local merit, to its support for "retrofit first".

Furthermore, the Belgravia Design Codes contribute positively to local guidance, though their application across the whole neighbourhood and reliance on conforming with local character, without always specifying that character in detail, does leave important further work to be done by the applicant.

We have no objections to the plan and do not envisage needing to participate in a public hearing if one is held. In appendix A of this letter, we offer comments which we believe would improve the plan and support its implementation.

For more information on incorporating historic environment considerations into a neighbourhood plan, please refer to our published advice available here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us if and when the Neighbourhood Plan is made by the council (via [LondonPlanningPolicy@HistoricEngland.org.uk](mailto:LondonPlanningPolicy@HistoricEngland.org.uk)).



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To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely

Guy Robinson, BSc, MRTPI  
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APPENDIX A: detailed additional comments on the Belgravia neighbourhood plan Regulation 16 version

Page	Section	Comment	Relevant wording for consideration (if any)
24	Policy BEL2: Retrofitting historic buildings for energy efficiency, and its supporting text	<p>While we broadly support the plan’s emphasis on the retrofit of traditional buildings, it would be better if it referred to ‘significance’. We suggest additional wording in both policy and supporting text.</p> <p>Also, we have a concern that criterion B could be unduly constraining. We suggest moving the text to supporting text as <u>examples</u> of how the policy might be implemented. There are other ways in which sensitive retrofitting can be achieved, which are not mentioned in criterion B. This is recognised in non-policy action 1 on page 26, which implies (correctly) that this is a fast-moving field, and we should not constrain or pre-judge the most appropriate solutions that might emerge in the future. As a result, we recommend deletion of criterion B from the policy.</p> <p>Alongside moving criterion B in to supporting text (to exemplify how the policy might be achieved) we recommend adding support in the plan for a “whole building approach” to the sensitive retrofit of traditional or historic buildings. This takes into account not only the fabric of the building and its services, but also the needs of its occupants and its context. Taking a whole building approach is described in a useful introductory video here: <a href="https://stbauk.org/whole-house-approach/">https://stbauk.org/whole-house-approach/</a></p>	<p>In the supporting text:</p> <p>“A large proportion of the buildings in Belgravia were built in the 19th century and are either listed or in one of the Conservation Areas (or both). As such, the issue of the sensitive upgrading of historic buildings is very relevant. However, this does not mean that such buildings cannot be adapted to accommodate features of modern energy efficiency without causing unacceptable harm to their heritage <u>significance</u>.”</p> <p>In policy BEL2:</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, provided that it <u>conserves the significance</u> safeguards the historic characteristics of these heritage assets.”</p> <p><del>B. The requirements of Part A of the policy could be achieved through:</del></p> <p><del>a. measures to reduce heat loss. This could include secondary, double or triple glazing in conservation areas and listed buildings with timber or metal framed windows where it is demonstrated that such interventions would not result in harm to the significance of listed buildings or character and appearance of conservation areas; and/or</del></p> <p><del>b. the replacement of fossil fuel burning energy sources with electric power from renewable sources with zero air emissions locally.</del></p>



		<p>Relevant advice from Historic England includes:</p> <ul style="list-style-type: none"> <li>• <a href="https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/</a></li> <li>• <a href="https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/low-and-zero-carbon-technologies">https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/low-and-zero-carbon-technologies</a></li> </ul>	
47-53	Section 5.8 and policy BEL6	<p>We welcome the identification of local buildings and structures of merit, and the additional information in Appendix E.</p> <p>If specific criteria were used to select such buildings (as we recommend in our advice note on <a href="#">local heritage listing</a>), it would be helpful if the plan made this clear.</p>	
33-36	Section 5.5 on building heights	<p>The Forum will be aware of an in-built tension between the proposed plan and the Westminster City Plan regarding tall buildings.</p> <p>Given the neighbourhood plan must align with strategic policies in the local plan, more fulsome reference in section 5.5 to policy 41 of the City Plan, would helpfully acknowledge the policy landscape in which decisions on building height are to be made.</p> <p>Also, in non-policy action 2 we recommend adding a reference to heritage significance. We suggest wording for consideration.</p>	<p>In section 5.5:</p> <p>“As mentioned, the Westminster City Plan affirms that “Westminster is not generally suitable for tall buildings” but goes on to qualify this stating “However, we also recognise that in some locations – and when well-designed – tall buildings can make a positive contribution to our townscape... The prevailing context height sets a baseline against which the impacts of any proposals for tall buildings will be considered”. ‘Tall buildings’ – so defined in Policy 41 as “buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline” and being a minimum of 18m as stated in the London Plan Policy D9 – are required to conform to a number of principles and conditions which are set out under that policy. <u>Included in policy 41 is policy support for taller buildings in the Victoria Opportunity Area in the east of Belgravia.</u></p>



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			In non-policy action 2 on building heights:  “Belgravia Neighbourhood Forum will seek to engage professional experts to provide a detailed profile of the prevailing context heights and the nature of the skyline in different parts of the Belgravia Neighbourhood Area and seek to use this to inform early engagement with Westminster City Council/developers in respect of proposals for tall buildings, <u>including the impact of such buildings on the significance of heritage assets and local character.</u> ”
55	Policy BEL8 on new monuments and public art	We encourage reference in policy BEL8 to public consultation with local stakeholders. Could this be interweaved with the aspiration for new monuments and art to resonate with local history? We offer alternative wording for consideration.	A. Proposals for new permanent monuments or public art in Belgravia are expected to demonstrate that: a. they are appropriate for their setting; b. they are of an appropriate scale; c. with the exception of Hyde Park Corner <sup>6</sup> , they have a connection to the local area of Belgravia and its history, <u>informed by consultation with local stakeholders</u> ; d. they have a maintenance and cleaning plan in place.
83-85	Streetscape	Reference could be made to our guidance <a href="#">Streets for All</a> regarding public realm and street clutter.	
8.1.2	Examples of heritage sensitive development	We emphasise the importance of assessing heritage significance to establish what constitutes heritage sensitive development. This is currently missing from this section and indeed the examples in the evidence base paper (which <u>may</u> constitute heritage sensitive development, but where it has not been demonstrated in the evidence informing the plan that such design responds to heritage significance). We recommend either deleting this text or ensuring that it refers to heritage significance.	
91-92	Neighbourhood infrastructure	We welcome reference to heritage in this section, using CIL funds “To protect the historical, cultural and architectural heritage of Belgravia”	



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