



Date: 20 July 2023  
Our ref: TfL TTLP / BH / WCC Belgravia NP  
Your ref: -

**Transport for London**  
TTL Properties Limited

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Dear Mr Avery,

## **DRAFT BELGRAVIA NEIGHBOURHOOD PLAN (SUBMISSION VERSION)**

Thank you for informing us that the Belgravia Neighbourhood Forum (BNF) has formally submitted the draft Belgravia Neighbourhood Plan (BNP) and supporting documents to the Council. Transport Trading Limited Properties Limited (TTLP) is pleased to provide its representations, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended), before you send the draft BNP for examination by an Independent Examiner.

Please note that the views expressed in this letter are those of TTLP in its capacity as a landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

### **Transport Trading Limited Properties Limited (TTLP)**

TfL has recently set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing and jobs in high demand areas and provide an increased revenue stream, and also to manage our commercial estate and undertake other development projects throughout London.

Please note that TTLP has superseded TfL Commercial Development, in whose name we submitted our previous representations on the draft BNP (letter dated 31 August 2022, copy attached for convenience). Our previous representations remain relevant

and should be submitted to the Inspector along with this letter when the draft BNP is submitted.

### **TfL Ownership and Development Interests in Belgravia**

TfL is a significant landowner in the City of Westminster (CoW) and has operational, landownership and development interests within the area covered by the Neighbourhood Forum including two potential development sites which are currently affected by safeguarding for Crossrail 2 at:

1. Victoria Coach Station (VCS) departures, Buckingham Place Road
2. Terminal House, Belgrave House and Ebury Gate, Buckingham Palace Road

Together with VCS Arrivals, they are identified within the draft BNP as the only “key development sites” within the Neighbourhood Area (page 87) and are therefore the only substantial opportunities for sustainable housing and employment growth within the Neighbourhood Area and this part of the Victoria Opportunity Area. As such, it is vitally important that the redevelopment opportunities provided by these sites are optimised. Further details of these two sites are included in our letter of 31 August 2022, including references to Crossrail 2 safeguarding, City Plan designations, the development opportunities for each site and emerging Site Allocations.

### **Comments on the Draft BNP**

We appreciate the positive changes that have been made to the draft BNP and Design Codes to address the issues we raised in our letter dated 31 August 2022. There remain a couple of outstanding issues, as detailed below.

#### 5.2 Design Principles and Policy BEL I : Design Principles

Our previous concerns that the policy focused on the local distinctiveness of the ‘village’ core is dealt with, to a degree, by the additional section on peripheral sites that has been added to the Design Codes document (see our comments on this below). However, we consider that it could be made clearer by a short addition to the policy itself along the following lines (suggested additional text in red):

B. Proposals for new development and redevelopment of existing buildings in Belgravia must demonstrate how they have responded to the requirements of the Belgravia Design Codes (as summarised in Appendix A). **Development proposals at the periphery of the Neighbourhood Area should not be required to place such great reliance on the need to be informed by historic precedent as within the historic core of the Area.**

We welcome the addition of paragraph C which seeks to ensure that sustainability is embedded into the design of any development.

### 5.5 Building Heights

We maintain that the BNP should recognise that the part of the Neighbourhood Area that is within the Victoria OA is potentially suitable for tall buildings (in accordance with the adopted City Plan).

The Draft Design Codes have introduced an additional section dealing with peripheral sites, in locations such as Buckingham Palace Road and Grosvenor Place, where change will need to be accommodated within the OA and where proposals should not be required to place such great reliance on the need to be informed by historic precedent as within the historic core. Paragraph 5.5.1 of the draft BNP also recognises that *“The tallest buildings [in the Neighbourhood Area] are to be found on the periphery of the Area, where it fronts onto major thoroughfares”*. We believe that a similar principle, recognising differences between the historic core and periphery, should apply to building heights. Particularly along Buckingham Palace Road, which is closest to Victoria and where 20 century development makes it less sensitive to change, the potential for tall buildings should be recognised.

We question the relevance of Figure 5.6; a view from above Sloane Square, which is not within the Neighbourhood Area. It is presumably from the top of the Peter Jones department store and is not, therefore, a view that is commonly experienced by members of the public.

### 5.8 Local Buildings of Merit

Figure 5.10 highlights unlisted buildings of merit in the Belgravia Conservation Area. It wrongly identifies Victoria Coach station as an unlisted building of merit. In fact it is [statutorily listed at Grade II](#).

## 8. Major Development Sites and Policy BEL I 4: Major Development Sites

As noted above, there are only two identified major development sites within the Neighbourhood Area: Victoria Coach Station and Ebury Gate / Belgrave House, and TfL has substantial interests at both. It is essential, therefore, that policies relating to these sites enable vital public transport operations as well as optimise potential development opportunities.

We welcome the addition of paragraph 8.1.3 which seeks to ensure that development minimises impacts on the climate and maximises sustainability.

We also welcome the changes to Policy BEL I 4 paragraphs a, b and c which now reflect the wording we proposed in our previous representations. We now consider these parts of the policy to be clear and unambiguous, and, importantly, to be positively drafted and to optimise the development potential of major sites as required by the NPPF, London Plan and City Plan.

## Appendix A: Design Codes

This should include a section for *Design on Peripheral Sites* to reflect the additional section in the draft Belgravia Neighbourhood Design Codes.

### **Comments on the Draft Belgravia Neighbourhood Design Codes**

TTLP welcomes the additional section on peripheral sites which has been added at page 53. In particular the recognition that change will need to be accommodated within the Victoria Opportunity Area (OA). However, we would suggest that “*growth*” should also be added in appropriate places within this section in order to properly reflect the OA designation which requires the delivery of 1,000 new homes and 4,000 new jobs. For eg, we suggest the following amendments:

Belgravia sits in the heart of London with change **and growth** expected **particularly** on its periphery.

And:

As development proposals are brought forward for the parts of the Opportunity Area within the Neighbourhood Area, it will be important that a balance is struck between the needs of **growth**, development and change to deliver the vision for the Opportunity Area and the recognition that this is part of Belgravia and should remain so.

This section should also recognise that the existing scale of buildings on the periphery (both within the Neighbourhood Area and on the opposite sides of major streets such as Buckingham Place Road) is much greater than within the historic core. Therefore, there should be an expectation that new development will be of a greater scale appropriate to this context as well as realising important development opportunities within the OA.

### **Concluding Remarks**

We trust that our representations are clear and helpful. We look forward to working with the Council and the Forum as the draft Neighbourhood Plan and Design Codes evolve, and also when we start to take our sites forward for development. In the meantime, if there is anything that you would like to discuss or any additional information that would be helpful, please do not hesitate to contact me (contact details above) or my colleague Luke Burroughs (07729 445755).

Yours sincerely



**Brendan Hodges**  
Acting Head of Planning  
TTL Properties Limited, Transport for London

**MAYOR OF LONDON**

Enc.

Letter from TfL Commercial Development (now TTLP) dated 31 August 2022

cc.

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