

Westminster City Council Neighbourhood Planning Team  
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Dear Officers

**Victoria Business Improvement District Response to the Regulation 16 Consultation – Belgravia Neighbourhood Plan 2023 – 2040 (Submission Stage May 2023)**

The Victoria Business Improvement District (VBID) is pleased to offer observations and comments on the Consultation Version of the Belgravia Neighbourhood Plan 2023 – 2040 (May 2023 version). Overall, VBID supports the preparation of a Neighbourhood Plan for this part of South Westminster, on which preparatory work first commenced in 2014.

VBID recognises the significant work involved in reaching this procedural milestone and supports the aspirations and ambitions of the Belgravia Neighbourhood Forum in having a Neighbourhood Plan in place as soon as is reasonable, given the changing dynamics of the City as it recovers from the impacts of the global pandemic.

VBID recognises that in accordance with Paragraph 16 of the NPPF, “plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. It is essential therefore that the policies of the Neighbourhood Plan must be robust, effective and enforceable, compliant with the Development Plan – the Westminster City Plan 2019 – 2040, London Plan 2021 and current national planning policy framework (NPPF).

**The Victoria Businesses Improvement District**

The Victoria Businesses Improvement District was established in 2010. The BID’s footprint is illustrated on the appendix to this letter.

Stretching from Chester Street eastwards and Pimlico Road/Avery Farm Row northwards to Buckingham Gate, VBID covers some of central London’s most iconic visitor locations. VBID represents BID Levy Payers, from major employers and FTSE 100 companies to smaller businesses across a range of sectors. Several of these businesses are located within the Belgravia Neighbourhood Forum Area first designated by WCC in 2014 and re-designated in 2020.

Delivering value through partnership is at the heart of our offer, with VBID working hand in hand with Westminster City Council and other partners to support business growth, enhance the environment and

lobby on behalf our diverse business communities and our projects are typified by collaboration. We were instrumental in helping to establish the Victoria Neighbourhood Forum and continue to support its work on the development of a neighbourhood plan.

For the purposes of transparency in submitting this letter of response VBID wishes to advise that it sits as a business member on the Victoria Neighbourhood Forum Steering Group.

In 2020 VBID with its neighbouring BID, Victoria Westminster, launched its public realm vision and strategy 'People Wanted' to provide a framework for stakeholders to work together towards an ambitious future for placemaking and public space in Victoria. Whilst not time bound nor forming statutory guidance, it was informed by the emerging City Plan and developed alongside dialogue with stakeholders and is intended to form part of Victoria's future Place Plan, which is being led by Westminster City Council. It also refers to the Belgravia Neighbourhood Forum's (then) developing neighbourhood plan. The public realm vision and strategy document can be viewed online at <https://www.victoriabid.co.uk/work/people-wanted/>.

VBID is also currently working closely with a variety of area partners and business members on the delivery of its business plan, in addition to major projects including Future Victoria and Project Swan. It is working proactively with various agencies on rough sleeping, crime and anti-social behaviour across the whole VBID area, including the immediate area around the various rail, underground and coach station entrances/exits and interchanges.

A significant focus of VBID's work is in relation to long-term regeneration of the area as well as on the comprehensive enhancement of the public realm incorporating area placemaking, greening, climate resilience, and sustainability projects. It is through this wider lens that VBID has considered the draft Neighbourhood Plan and submits this letter of representation for due consideration.

### **Regulation 16 Draft Neighbourhood Plan – VBID Comments and Observations**

VBID wishes to present the following comments and observations on the submission version of the neighbourhood plan. In some instances, VBID also suggests areas whereby clarification and in some cases modification of the wording draft plan should be made.

1. The Belgravia Neighbourhood Area shown in several maps in the current draft includes part of the designated VBID footprint and one of its maps should show this boundary given the complexity of the area.
2. The plan should also make explicit in the body text that part of the Belgravia Neighbourhood Area is a designated Business Improvement District. The importance of welcoming international and domestic visitors and the benefit to the local economy in this part of South Westminster and the wider Central London Central Activities Zone should be identified clearly as an opportunity to strengthen and support the local and independent businesses through job creation and retention and skills advancement. We

note in the draft plan that, “The number of those employed in the Belgravia Neighbourhood Area is estimated at approximately 17,000, based on the most recent WCC Ward Profile (2018) and Business Register and Employment Survey (2016) ...Whilst a small amount of overlap between residents and workers is to be expected it is probably fair to assume that the regular daytime population of Belgravia is swelled to around 24,000 by incoming workers (i.e. residents plus workers)” (p13).

3. We consider it beneficial to ensure clarity of planning policy objectives (draft policies) and non-policy actions (which read more as ‘aims and objectives’) of the plan. The use of the term non - policy actions is somewhat confusing to the reader and in some parts could be removed. A summary list of the neighbourhood planning policies would also be a beneficial inclusion. In particular, insofar as Non-Policy Actions: Clarity as to how Non-Policy Action 4 would be operationalised is sought; Further detail should be provided as to how the forum will ensure Non-Policy Action 5 is met; Non-Policy Action 9 may benefit from being supported by evidence setting out how commercial use of squares has changed over time; VBID has undertaken studies on traffic and freight consolidation and would welcome working with the BNF on Non-Action Policy 11.

It is considered important that the duties and roles of the neighbourhood plan do not unduly overlap with those of the amenity societies in relation to good planning and design nor constrain sustainable development growth.

4. The tone of the draft plan is in some parts very observational in nature and at times using words such as ‘preferred’ and ‘agreeable’. Matters of design are well acknowledged to be subjective and so words such as ‘agreeable’ and ‘desired’ should be revised.

5. It is viewed essential that the neighbourhood plan be drafted in a balanced way so as not to be overly prescriptive in its approach and drafted to be in accordance with the adopted Westminster City Plan, Supplementary Planning Guidance and the Strategic Development Strategy and Policies of the published London Plan 2021. It should not be the intention of the Neighbourhood Plan’s policies to overly resist or constrain density or development within or adjacent to the Belgravia Neighbourhood Area but used to promote contemporary high-quality architectural design, well designed buildings and public spaces of appropriate scale and building height, informed by view assessment, heritage and townscape considerations.

6. The plan should acknowledge the opportunities for small scale infill types of development as well as the re-modelling of larger or more complex sites to enable greater well managed public access.

7. We set out below our comments and observations on specific draft policies from the list (BEL 1 – 14 advised in Sections 5 and 6 as relevant to the VBIDs interests.

Draft Policy BEL1: Design principles

Part B – refer to comments regarding Neighbourhood Design Codes below.

Draft Policy BEL2: Energy efficiency including retrofitting historic buildings

We are not clear on the intended audience of the Belgravia Neighbourhood Plan Sustainability Charter, how it is to be operationalised and enforced, and how it relates to the Sustainable City Charter recently launched by WCC, an ongoing initiative which has growing industry recognition.

Draft Policy BEL3: Belgravia's character areas

The list of character areas noted in draft policy BEL 13 should be expanded to include non-residential character areas such as the more mixed-use areas such as Buckingham Palace Road and environs.

Part C - should be modified to add greater flexibility in scheme implementation to read "Proposals must demonstrate that they will retain and, where possible, enhance the character of the area through the retention or reinstatement of historical and/or architectural features **as appropriate and practical.**"

Part D – should be modified to ensure that due consideration can be given to site specific consideration, relevant adopted City Plan designations and wider townscape assessment.

"Development should (delete – must) be of an **appropriate** scale and massing that (delete - responds to and preserves the setting of the character areas) **without constraining growth.**

Delete full sentence – "This also applies to development outside the character areas which could affect their setting".

The supporting text to the policy discusses the approach to building heights. The plan should be supportive of planning policy in this subject area. Reference should be clearly made to the adopted City Plan and evidence base documents including the Westminster City Council's Building Height Study including Appendix (2019).

Draft Policy BEL5: Local views of significance

Figure 5.8 shows new additional views of local importance, in addition to those already included within the draft Belgravia Conservation Area. It is not clear how existing WCC and London Plan policies do not provide the protection required for views where they comprise buildings. Details regarding the methodology and selection criteria for these new 'views' should be clearly explained.

Draft Policy BEL6: Local buildings and structures of merit

It is noted that the draft plan advocates for the adoption of the Belgravia Conservation Area and reflects on areas of proposed extension. It is noted that this is a matter that falls outside of the development of the neighbourhood plan and current scope of consultation.

Draft Policy BEL8: New monuments and public art

The draft policy would benefit from clarification of what is expected in terms of the placement of new public art in terms of maintenance and cleaning to ensure neighbourhood amenity for the long term.

**Draft Policy BEL10: Small scale workspaces**

It is not the case that small scale workplaces can only be accommodated in small scale sites which could be inferred by the supporting text. The plan should refer to the role of large-scale buildings in providing spaces for small scale workplaces. The opportunity for cross pollination of business amenities and provision of incubator and start up spaces including allowing for grow on business space should be encouraged, to respond to changing market conditions.

**Draft Policy BEL11: Space for play and group social activities**

Given the significant areas of open space and play space deficiency set out in the plan, we wonder whether the private squares might be able to increase the frequency to which they are opened for children living in or close to areas of open space and play space deficiency who normally cannot access them.

**Draft Policy BEL12: Trees and greening**

The policy should be modified to encourage new tree planting throughout the neighbourhood area as a general principle. VBID's Public Realm Strategy People Wanted provides further guidance to the Forum.

**Draft Policy BEL14: Major development sites**

We submit that the draft plan should include reference to the Future Victoria project (the development of a masterplan for Victoria Station and its environs) and Project Swan (a heat network project for South Westminster) in the list of major projects advised in Section 8.1.

8. The independent examiner might wish to consider whether the draft plan should include more detailed policies for recycling and the sustainable reuse of materials and infrastructure in the neighbourhood area.

9. Section 9 of the draft plan advises on the priorities for CIL funding. The VBID supports this approach and list of priorities as identified.

**Neighbourhood Design Codes**

It is understood that the Belgravia Neighbourhood Plan may become the first neighbourhood plan within the City of Westminster to include a Neighbourhood Design Code, unlike the adjacent neighbourhood areas of Knightsbridge and Pimlico.

The submission version (dated January 2023) of the Belgravia Neighbourhood Design Codes has been prepared by architects Pilbrow and Partners. It is prepared as separate document to Appendix A of the draft neighbourhood plan (submission version) and the design principles clearly listed within on pages 98-102.

Our initial assessment of this approach is one that appears overly complex and somewhat confusing to the reader which may weaken the overall intended purpose.

The separately drafted Neighbourhood Design Codes document explains its intended purposes as supplementary guidance to the neighbourhood plan. It fails to cross reference the related and applicable draft policies of the neighbourhood plan.

It further explains that they are to be used in the following way “Using the Design Codes - The design codes reflect principles drawn from the character of the context rather than prescriptive standards. It is proposed that these design principles apply across the whole Neighbourhood Area, serving to reinforce its existing character and quality of place’.

The status of the neighbourhood design code should be clarified in the draft plan in planning policy terms at this stage and in relation to the Development Plan for this part of Westminster and National Planning Policy and Guidance to ensure that there is no ambiguity in its status and application both in terms of shaping architectural scheme design and the determination of planning applications and planning appeals.

Similarly, the documents status in relationship to the City Council’s draft Belgravia Conservation Area Audit (Conservation Draft October 2013) should be clarified. It is noted that the boundary of the BCA varies from that of the BNF area.

The Neighbourhood Design Code should make summary reference to the made Pimlico Neighbourhood Plan (December 2022) given its adjacency to the Belgravia Neighbourhood Area and the Victoria Opportunity Area.

Design Codes must not serve to restrict a site’s development potential or restrain opportunity. It is important that both new development and the ability to retrofit existing buildings through enhancement, adaptation and extension can come forward within the Victoria Opportunity Area. To enable quality architectural and place design it is essential that Design Codes be drafted with appropriate flexibility to enable the guidance to be interpreted on an individual site basis informed by relevant and material site conditions.

VBID has focused specifically on draft code 2.13 – Design on Peripheral Sites given the BIDs footprint and business members interest in this part of the Neighbourhood Area.

Page 52 presents Figure 72 which classifies several buildings as ‘negative’, but no definition is given as to the meaning of this classification or indeed any method for this assessment explained. The inclusion of a definition of what is meant by ‘peripheral’ in terms of locational context’ should be included in a Glossary of Terms and the area defined as ‘peripheral’ indicated clearly on Figure 72.

It is noted that Figure 135 included within the Draft Belgravia Conservation Audit illustrates negative buildings inside the designated area and paragraph 4.125 advises that “Negative buildings are those that

due to their scale, detailed design or materials are considered to detract from the predominant character of the conservation area". It is considered that the same or similar definition would be a helpful inclusion to the Neighbourhood Design Code included in a Glossary of Terms.

It should be clarified that no policy weight can be afforded to the Design Codes outside the Neighbourhood Area and specifically within the Victoria Opportunity Area. VBID would contend that the intent of a Design Code in this location is overly prescriptive in what is a strategically defined growth area designated in the London Plan as an Opportunity Area. In addition, spatial development priorities are clearly expressed for the Victoria Opportunity Area by Policy 4 of the adopted Westminster City Plan 2019-2040.

### **Forward Progress to Examination and Referendum**

VBID hopes that these comments and observations are helpful ahead of the draft plan's examination. It looks forward to collaborating with all partners and stakeholders in shaping the future of Belgravia and Victoria.

I would kindly ask that VBID is kept updated by Westminster City Council via this email address on the progress of the plan, including notification of forthcoming examination dates as the VBID may have interested in attending number of hearing sessions.

If you require any additional information or wish to discuss further, please do not hesitate to contact me.

Yours sincerely



**Ruth Duston, OBE, OC**

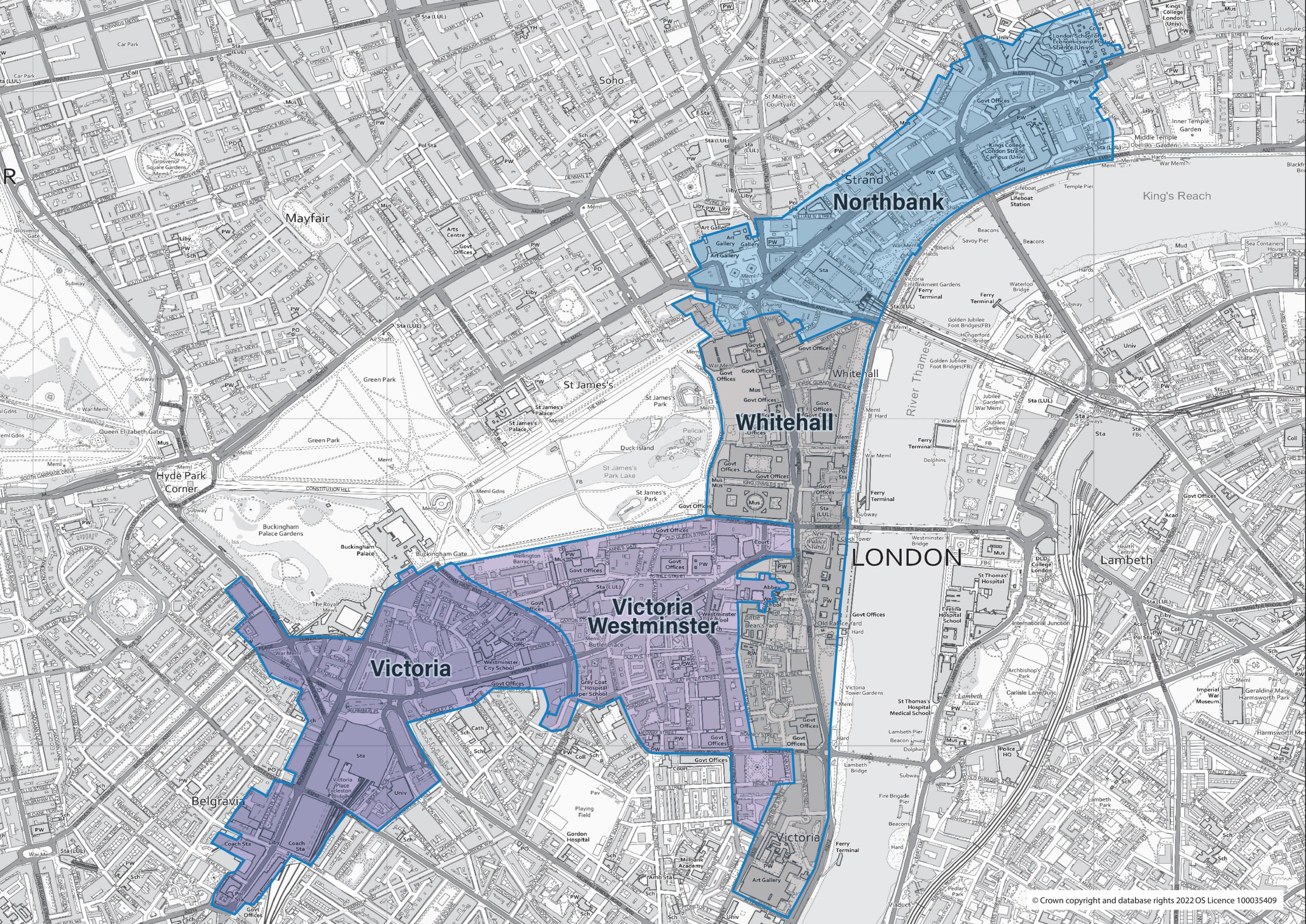
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