

Belgravia Neighbourhood Plan 2023 – 2040: Victoria Neighbourhood Forum’s Response to the Regula...



To Neighbourhood, Planning: WCC
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Follow up. Start by 25 July 2023. Due by 25 July 2023.

Dear Sirs

The Victoria Neighbourhood Forum (VNF) is pleased to offer observations and comments on the Consultation Version of the Belgravia Neighbourhood Plan 2023 – 2040 (May 2023 version). As a neighbouring Forum in the early stages of preparing its own draft Plan, we recognise the effort that has gone into the drafting of the Belgravia Neighbourhood Plan and we congratulate those involved on their progress to date.

The VNF 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”. To a large extent, this Regulation 16 draft deals with some of the inconsistencies contained within the Regulation 14 draft, particularly over its attempts to influence developments outside its Neighbourhood Area. We welcome its stronger focus on sustainability and its ‘retrofit first’ approach but particularly for those parts of the Neighbourhood Area that are within the Central Activities Zone and/or the Victoria Opportunity Area, the draft Plan does not, in its current form, actively encourage growth. Specifically for those areas outside the Conservation Area on the fringes of Belgravia where there is the potential for greater density, and potentially greater heights to be achieved, the draft could adopt a more enabling approach.

Design codes, generally, are for new developments and this proposed design code illustrates the difficulties, even for an area as apparently homogenous as Belgravia, of preparing guidance for an area that is already developed and mostly within a Conservation Area but which still has a considerable variety of buildings within its boundaries. Belgravia has a number of buildings, designed by renowned architects, that while they may not strictly comply with the proposed design code, provide interest, variety and perhaps the listed buildings of the future. Design codes should provide the principles, rather than define the detail, for future developments.

There are a number of Non Policy Actions, such as on views, trees, green spaces and traffic, where in addition to liaising with the City Council and Transport for London, close working relationships with the adjacent Neighbourhood Forums, if only to ensure a consistent approach, would be beneficial. The VNF, in drafting its own Plan, will also need to take neighbouring Plans into account.

Overall we support the ambition and overall direction of the draft Plan and we will continue to watch its progress with interest.

Yours faithfully,

Nigel Hughes MBE

Chairman | Victoria Neighbourhood Forum

