

INDEPENDENT EXAMINATION OF THE BELGRAVIA

NEIGHBOURHOOD DEVELOPMENT PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSc MRTPI

Dennis Wheatland
Belgravia Neighbourhood Forum

Brandon Avery
Westminster City Council

Via email

Examination Ref: 01/JK/BNP

3 October 2023

Dear Mr Wheatland and Mr Avery

BELGRAVIA NEIGHBOURHOOD DEVELOPMENT PLAN EXAMINATION

I have read the submitted Belgravia Neighbourhood Plan (the Plan), the supporting evidence documents and the consultation responses from the Regulation 16 public engagement exercise. I carried out a site visit to Belgravia on 28 September 2023.

Flowing from my initial appraisal, I would be grateful if the Neighbourhood Forum would provide a response to the points raised below, and provide its view as to whether appropriate modifications should be recommended to the submitted Plan to address these points. If so, I would be welcome for the Forum's input on the exact wording that might potentially deal with such modifications. This should enable me to progress my examination. I would like to receive a written response by **Friday 20 October 2023**, if possible, although an earlier response would be appreciated if practicable. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

It is clear to me that Belgravia is a complex area with a distinctive character and history. Figure 5.1 in the Plan shows that much of the designated Neighbourhood Plan Area has Conservation Area status, where the character and appearance of the area should be preserved or enhanced. Figure 5.9 shows that designated Listed Buildings are scattered across Belgravia, and Figure 5.13 indicates that extensions to Belgravia Conservation Area are being proposed. Sections 5, 6 and 7, at the heart of the Neighbourhood Plan focus on Conserving and Enhancing the Heritage of Belgravia, Maintaining and Enhancing the "Village Feel", and Improving the Environment.

However, Victoria Station (catering for over 80 million passenger trips per year prior to the onset of Covid-19, according to the Neighbourhood Plan) adjoins the eastern boundary of the Belgravia Neighbourhood Plan Area. Victoria Coach Station, which lies within the Plan Area, adds a further 14 million passenger trips and over 470,000 coaches to Belgravia's road network. As shown on Figure 2.2, land adjoining Buckingham Palace Road forms part of the Victoria Opportunity Area where there are many commercial buildings, serving a variety of business interests. The London Plan and Westminster City Plan expect significant new development to provide additional homes and jobs in the Opportunity Area. As shown in Figure 6.1, part of the Belgravia Neighbourhood Plan Area, including Hyde Park Corner, and land adjoining Grosvenor Place and Buckingham Palace Road, is within the London Central Activities' Zone (CAZ). Within the CAZ, Westminster City Plan's spatial strategy states that growth will be focussed to deliver commercial-led and mixed use development (office, leisure and retail floorspace) alongside new homes. "Intensification and optimising densities in high quality new developments that integrate with their surroundings and make the most efficient use of land ..." is a key element in Westminster's spatial strategy. Section 8 of the Belgravia

Neighbourhood Plan addresses Major Development Sites, focussing on Victoria Coach Station and Ebury Gate/Belgrave House, and Policy BEL14 sets out the criteria which proposals for major development should meet.

I recognise that there is tension between (1) the aim to conserve the heritage and character of Belgravia and maintain its “village feel” for the residential community, and (2) the aim to secure economic growth by delivering commercial and mixed-use development, especially in the CAZ and Victoria Opportunity Area. The Neighbourhood Plan has, in my opinion, to reach a position which has taken full account of both sets of strategic policy aims and should minimise any future detrimental consequences. A number of parties responding to the Regulation 16 consultation exercise argued that the Belgravia Neighbourhood Plan is too restrictive towards future growth and should be modified. In this regard, it would assist me if the Neighbourhood Forum would respond to the points raised in the Regulation 16 exercise by the following parties:

1. Victoria Neighbourhood Forum
2. Grosvenor Estate
3. Transport for London, including its Commercial Development and Properties Departments
4. City of Westminster
5. Victoria Business Improvement District.

These parties have proposed some detailed modifications to the submitted Plan, to encourage and enable more growth than the Plan currently envisages. It would be helpful to know the Forum’s views as to whether or not any or all of the proposed modifications should be made?

In addition, modifications have been proposed by the following parties on a range of topics. It would help me to know the views of the Neighbourhood Forum on them:

1. Liam Hennessey (architect) and Terence Bendixson OBE – comments on traffic management and pedestrian access at Hyde Park Corner (in particular to Apsley House); and changes to traffic movement at Belgrave Square, similar to those for Hanover Square.
2. Westminster Cycling Campaign – case for added references to low-traffic neighbourhoods.
3. London Parks and Gardens – case for referring to the organisation, and its work in London.
4. Historic England – seeks rewording of Policies BEL2 and BEL8, and a reference to its own guidance: Streets for All.
5. Michael Field – seeks added references to pedestrian paving, street furniture and signage.
6. Environment Agency – seeks modification to Policy BEL12: Trees and Greenery.
7. Knightsbridge Neighbourhood Forum – seeks modifications on retrofitting historic buildings for energy efficiency (Policy BEL2), on strengthening references to The Sustainability Charter, and to Policies BEL4 and BEL7.
8. Josephine Ohene-Djan – seeks more detail of accessibility for the disabled communities.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter and the subsequent response is placed on the Neighbourhood Forum and Westminster City Council websites.

Thank you in advance for your assistance.

Yours sincerely

Jill Kingaby

Examiner