

**BELGRAVIA NEIGHBOURHOOD PLAN – RESPONSE TO REGULATION 16 REPRESENTATIONS BY BELGRAVIA NEIGHBOURHOOD FORUM**

Date: 27 October 2023

Item	Respondent	Policy/para/ theme	Summary of representation	Suggested response
1	Victoria NF & Grosvenor	Growth	For parts of the Neighbourhood Area that are within the CAZ and/or the Victoria Opportunity Area, the Plan does not actively encourage growth.	<p>The Belgravia Neighbourhood Forum (BNF) disagrees with this assertion. The Westminster City Plan has established the Victoria Opportunity Area (VOA) and the quantum of growth that it should accommodate over the plan period. However, there is nothing that the Belgravia Neighbourhood Plan (BNP) says which actively tries to ensure this cannot happen – to do so would mean the BNP would not meet the Basic Conditions. What the BNP is seeking to do is ensure that recognition is given to the fact that the part of the Victoria Opportunity Area that is within Belgravia is distinct, certainly with respect to the rest of the VOA. Therefore it is incumbent on development proposals in this area to recognise this and be informed by this. Ultimately the common theme in the BNP is about ensuring good quality design that shows respect to its surroundings. It is considered that this can be achieved alongside development which facilitates growth.</p> <p>We accept the notion of balancing growth could be further promoted by the inclusion of the following wording in the section titled ‘Developments in the Victoria Opportunity Area’ in Section 2.3.4 on Page 14:</p> <p><i>“However, development generally in the Victoria Opportunity Area is required to be of substantial scale in order to meet these growth targets, meaning that it is very likely to include a number of very high-rise apartment blocks, <u>commercial or mixed use developments</u>. Whilst acknowledging the need for <u>appropriate growth in these strategic locations</u>, the concern for Belgravia is that, although even when outside the</i></p>

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				<i>Neighbourhood Area, this could dominate the historic Belgravia skyline thus affecting current views and open vistas which are such a character of the area.”</i>
2	Victoria NF; Grosvenor Estate; & TTL properties	Building heights	<p>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.</p> <p>The Plan’s approach could be used to seek to restrict height and growth within these areas.</p> <p>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 <i>“The tallest buildings [in the Neighbourhood Area] are to be found on the periphery of the Area, where it fronts onto major thoroughfares”</i>. 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.</p>	<p>A significant part of the evidence base for the BNP is the Design Codes report. For sites on the periphery of Belgravia (including in the VOA), the relevant section is 2.13. The 3<sup>rd</sup> paragraph states: <i>“Notwithstanding the above, we believe that 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.”</i></p> <p>It is not considered necessary or appropriate for the BNP to say anything about tall buildings, given the strategic context presented in the Westminster City Plan (WCP). Paragraph 4.6 of the WCP states: <i>“The area [the VOA] contains a significant number of larger and taller buildings which are primarily located along the key routes of Buckingham Palace Road, Vauxhall Bridge Road and Victoria Street. Victoria is also home to a significant number of heritage assets, including the Grade II Listed station, Grade I listed Westminster Cathedral and is in close proximity to the Royal Parks, the Thames and the Westminster World Heritage Site. Development in the Opportunity Area will need to be sensitive to these assets and their settings, and contribute to their enhancement where possible.”</i></p> <p>Clause C of Policy 41 (Building Height) then states: <i>“There may be potential for further tall buildings in this area that complement and help to frame the setting of Victoria Station and Victoria Street and contribute to the quality and character of the existing cluster.”</i> Clause D goes on to say that: <i>“Proposals for tall buildings outside of the areas identified in clause C will</i></p>

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			<p>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.</p>	<p><i>not generally be acceptable, and will need to demonstrate...</i>". It then gives criteria for this.</p> <p>It is considered that this is sufficient context for how tall buildings should be considered. Section 5.5 of the BNP is intended to focus largely on Belgravia. As noted in the supporting text on p36 (immediately before Non-Policy Action 2): <i>"The Forum will work determinedly to ensure that the principles set out in Clause B of Policy 41 of the City Plan are met both in practice and in spirit and accord totally with the guidelines set out in the Belgravia Design Codes..."</i>. As noted above, the Design Codes are clear that sites on the periphery are not required to place such reliance on the historic precedence.</p> <p>Regarding Figure 5.6, this is a location that is accessible to the public (the travel agency department within the store) and part of the reason is because it presents a view of the iconic London skyline.</p>
3	Victoria NF	Design codes	<p>Design codes should provide the principles, rather than define the detail, for future developments.</p>	<p>The Design Codes report does provide the principles to inform future development. This is reflected in the opening of the Design Codes which states on Page 5 the <i>"The design codes reflect principles drawn from the character of the context rather than prescriptive standards"</i>. It is unclear from the representation how it defines the detail as no examples are given.</p>
4	Grosvenor Estate		<p>We disagree with the Plan's general approach to expand the area which is 'recognisably Belgravia' (i.e. the core)</p>	<p>Whilst it is acknowledged that this statement is made on p35, the BNF recognises that the BNP cannot do this in a practical sense through its planning policies. The strategic policy context in the Westminster City Plan and the designation of the Victoria OA is in policy and the BNP must be in general conformity with these strategic policies. The BNP, the BNP Design Codes and the Westminster City Plan provide the context and policy for how</p>

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				<p>sites on the periphery of the Neighbourhood Area should be considered.</p> <p>To address this point, we accept the following amendments to Section 5.5.1 on Page 35, as follows:</p> <p><i>“Accordingly, a core principle should be that any 20th or 21st century buildings, whether inside or outside the Neighbourhood Area, which are significantly taller than those in the immediate vicinity should not be taken to establish a new, taller context height that applies across parts of the Neighbourhood Area that are more modest in scale. This is of particular concern in the south western corner of the <u>Neighbourhood Area</u> where <del>the Belgravia context heights are low but are adjacent to buildings outside the Area with significantly higher context heights. some buildings are substantially taller than other parts of the</del> <u>neighbourhood area, as shown on Figure 5.5. This area also has fewer listed buildings and partially lies outside the Conservation Area. We wish to increase the size of the area that is recognisably Belgravia (see explanation in section 3.2) and not have the characterful part of the area, with its blend of 19th century buildings, reduced and negatively affected by over-height modern buildings on its periphery. In these areas where buildings are typically below the London Plan definition of ‘tall’, it is particularly important that new building height is appropriate.”</u></i></p> <p>We also propose the addition of a final paragraph to Paragraph D in Section 3.2 to address this. Revised wording is as follows:</p> <p><i>“Justification: The core of the Belgravia Neighbourhood Area is largely protected by virtue of its Conservation Area and the large number of listed buildings it contains. However, the</i></p>

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				<p><i>fringes of the Area, especially those bordering Grosvenor Place and Buckingham Palace Road are outside the Conservation Area. It is the objective of the Neighbourhood Forum going forward to monitor development proposals and campaign to ensure that the area which is “recognisably Belgravia” is extended rather than reduced, and that major development on the fringes of the Area does not encroach adversely, either physically or visually, on to the Belgravia Area nor can be used to justify undesirable precedents in terms of height or density within the Neighbourhood Area. <u>These aspirations will however need to be balanced against the policy support provided in both the City Plan and London Plan for the intensification of the CAZ and Victoria Opportunity Area for commercial led growth.</u>”</i></p> <p>Finally, we propose the following minor amendments to Clause C of Section 5.2.2:</p> <p><i>“The objectives and mission of the Plan are to ensure that the area which is recognisably Belgravia (see explanation in section 3.2) is protected and enhanced and that developments on the fringes <del>contribute</del> <u>are cognisant to</u> of the surrounding <u>townspace qualities, including Belgravia’s unique character</u> rather than detracting from it or jarring uncomfortably.”</i></p>
5	Grosvenor Estate		<p>In respect of Crossrail 2 for example, Westminster’s City Plan at para 4.9 identifies that the project would “<i>deliver a modern transport interchange that can support future operation, improve access to transport, movement in the area and enhance the public realm</i>”. These benefits would have strategic importance and should be supported.</p>	<p>To meet the Basic Conditions, the Plan is not obliged to ‘support’ something (when the alternative is to be silent on it). It should be in general conformity with the strategic policies of the development plan. It is not clear how this text – which is not policy – fails to meet this Basic Condition as it simply identifies this as a ‘future development issue’.</p>
6	Grosvenor Estate		<p>We suggest that references within the body of the Plan (albeit not in policy) which directly advocate maintaining the status quo are removed – this is</p>	<p>If this is neither policy nor reasoned justification for a policy, then it is unclear why it should be removed.</p>

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			particularly the case for section 5.5.1 which is titled <i>'Why buildings substantially higher than their surroundings are not suitable in Belgravia'</i> .	
7	Grosvenor Estate		Westminster City Plan Policy 41 which is quoted includes a clear definition of a tall building, i.e. one which is twice the prevailing context height. Despite this, areas of the draft Plan (e.g. section 5.7.2 and p33) suggest anything which is above the prevailing height, but below the 'tall building' definition as something which should be strictly controlled. This is inconsistent with strategic policy and would lead to a more restrictive approach than set out within the City Plan. Adopting this approach would be inappropriate as it would restrict, rather than support growth, in clear nonconformity with the direction of adopted development plan policy.	It is not disputed that Westminster City Plan Policy 41 includes this clear definition of a tall building. However, para 41.1 states, "The historic position was, and remains, that Westminster is not generally suitable for tall buildings." It notes that tall buildings can make a positive contribution in some locations. Section 5.7.2 of the BNP simply lays out the BNF position as to why Belgravia is not suitable for tall buildings. However, this is not followed through into a policy therefore it is not clear how it is restrictive of growth.
8	Grosvenor Estate		We note the draft Plan's strong reliance on the draft Belgravia Conservation Area Audit ('CAA') which appears to have been used to establish draft planning policies particularly in respect of architectural character and local views <sup>4</sup> . The CAA has not been formally adopted and even if it were to be adopted today it would still only hold status as supplementary planning guidance. Transposing the CAA into Neighbourhood Plan policy elevates its importance within decision-making as it would then effectively form part of the development plan. The CAA is now 10 years out of date. If the CAA is going to be used to form the basis of planning policy, then it should be properly updated and consulted on as part of the evidence base for the draft Plan.	Whilst the CAA has not been adopted and is now 10 years old, this does not automatically mean it is out of date (indeed the representations somewhat disingenuously say it is 10 years out of date which would mean it was out of date on the day it was published). In fact, of all the disciplines for which evidence-base documents are prepared, a CAA is likely to have the most longevity. The nature of heritage is that it does not change anything like as quickly as, for example, housing, employment or retail. The BNF does not consider that the contents of the CAA are out-of-date. WCC does not consider this to be the case either, as demonstrated by the reliance it has placed on it with respect to its representations on the BNP, e.g. comments regarding Clause 7.3.1. WCC's approach to some recent planning applications within the Conservation Areas has also demonstrated that, as planning authority, it gives significant weight to the CAA's principles.
9	Grosvenor Estate		Whilst the NPPG is not prescriptive around exactly what evidence should support a Neighbourhood Plan,	It is unclear why the CAA is not proportionate or robust. No evidence has been cited to support this claim.

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			it is clear that this should be proportionate and robust. We do not consider that the CAA as drafted fulfils this requirement.	
10	Grosvenor Estate		There are some sweeping statements within the draft Plan which do not appear to have been based on evidential fact (e.g. that the pressure for London to grow and provide more workplaces, accommodation and infrastructure have been reduced by the effects of the Covid-19 pandemic <sup>10</sup> , retail/catering which contributes to a 'village' feel can survive on lower footfall than in major centres and does not require the attraction of substantial footfall from outside the Neighbourhood Area to sustain its economic viability <sup>11</sup> and that the loss of two banks has contributed to a detrimental knock-on effect on the retail centres which they used to anchor <sup>12</sup> ). These statements are not based on commercial reality – for example there is no evidence that retail/catering uses rely on less footfall and the point regarding the loss of banks simply reflects changes in societal and consumer behaviour. Such statements should be removed and there should be greater acknowledgement of Belgravia's commercial role, both for residents within Belgravia and within the wider CAZ/Victoria OA.	What the BNP says in para 6.1.2iii, bullet point 6, is that the kind of retail and catering which is influential in creating the village atmosphere "can survive on footfall lower than in major retail centres." Whilst Grosvenor disputes this, it disregards why local plans establish a retail hierarchy and what the implications of this are. It is self-evident that shops in Belgravia, primarily located in its Local Centres and Secondary Centres, will attract lower footfall than the International Centres and Town Centres. The fact that they trade here is because the surroundings offer something that the higher order centres cannot. If they couldn't survive on the levels of footfall in these locations, then they would close. It is not the case that every centre which has retail and service businesses needs to maximise levels of footfall. This is recognised in planning through the use of a retail hierarchy which seeks to direct higher footfall businesses to the higher order centres.
11	Grosvenor Estate		Promoting an approach which discourages footfall into and through Belgravia is not inclusive and we consider that the Plan should promote a sensible degree of movement. This point extends to some statements in the Plan regarding the night-time economy – for example at para 6.1.3 the increase in the night-time economy beyond existing hours is considered to be a 'detractor' to the area which would be "seriously detrimental to the peacefulness of the area". We agree that Belgravia has a significant residential population	It is not clear how the BNP can promote a 'sensible' degree of movement. This is not something that can be turned on or off like a tap. The residential community which was engaged in the development of the BNP was very clear that the impact of the night time economy is significant – this is a very sore issue. Grosvenor cites London Plan Policy H6 which states that "boroughs should promote the night-time economy, <u>where appropriate</u> ,..." (our emphasis). Policy BEL9 is clear that it only applies to uses outside the CAZ which is predominantly residential in character. In these areas it is considered

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			<p>and that any proposals coming forward, including night-time uses, must carefully consider and respect residential amenity so as to not harm amenity. However, the London Plan (Policy HC6) acknowledges the importance of the night-time economy, particularly in the CAZ. We suggest that any statements in respect of the nighttime economy are reviewed to be cognisant of this wider policy aspiration.</p>	<p>inappropriate to promote the night-time economy, so is in line with London Plan policy.</p>
12	Grosvenor Estate		<p>We also suggest that reference to aspirations to restrict servicing hours outside of 11pm-8am be removed. Whilst we agree that consolidated servicing would bring huge benefits to the area (which we try to promote where feasible), 8am for some commercial uses in a central London location is very late. Therefore, whilst we agree in principle that servicing needs need to be balanced against residential amenity, there needs to be a balance struck to allow all uses to function in a mixed-use environment.</p>	<p>It is accepted that any restriction before 8am could be brought forward to end slightly earlier. However, as noted in the BNP, this is an aspiration and it specifically seeks to 'discourage' deliveries in anti-social hours. It is unclear how this amendment is required to meet the Basic Conditions.</p>
13	Grosvenor Estate		<p>The Sustainability Charter, for instance, will not be able to be adhered to fully in all instances and there must be flexibility for these circumstances so as to not frustrate development which can deliver benefits.</p>	<p>Policy BEL1C encourages adherence to the Charter. It does not require it.</p>
14	Grosvenor Estate		<p>Reference is made within the draft Plan to the Forum's Best Practice Guidance on Construction Standards and Procedures for Level 3 Projects, "<i>which development proposals are encouraged to follow</i>", as well as guidance on community engagement...We note that these documents do not form part of the formal Neighbourhood Plan documents for consultation. The guidance states that despite them not having development plan status, they will be treated as a material consideration for planning applications. We question the authority of the Belgravia NF to prepare</p>	<p>This is the same approach and wording as included in the made Knightsbridge Neighbourhood Plan.</p>



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			such a document outside of the Neighbourhood Plan process and direct any decision maker to certain material considerations.	
15	Grosvenor Estate		At section 10 there is reference to the establishment of a Neighbourhood Representation Panel, based on 'Zones' made up of local residents. Given that Belgravia does have a commercial element we consider that these Zones should include businesses (not just residents) where relevant, to ensure that the views of the Zones are balanced and take into account all uses of the local area.	This is a reasonable suggestion.
16	Grosvenor Estate	BEL1	Suggests detailed wording amendments	<p>BEL1A – accept.</p> <p><i>A. Proposals for new development or the redevelopment of existing buildings should contribute towards the local distinctiveness of Belgravia, as characterised by its blend of 19th century buildings within a planned street network. They should demonstrate high quality, sustainable design and architecture that responds to and enhances the character of the surrounding area, particularly in terms of the height, scale, density and mass of the built form.</i></p> <p>BEL1B – WCC has suggested that 'requirements' be changed to 'principles'. BNP agrees with this change. However, it does not accept the suggested change to 'considered' from 'responded to'. It is very easy to say you considered something but did nothing about it.</p> <p>'...as relevant to the site and local context' is accepted.</p> <p>Note also the agreed amendments from WCC.</p> <p><i>B. Proposals for new development and redevelopment of existing buildings in Belgravia must demonstrate how they have responded to the <del>requirements</del> principles of the Belgravia</i></p>

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				<i>Design Codes (as summarised in Appendix A), <u>as relevant to the site and local context.</u></i>
17	Grosvenor Estate	BEL2	Suggests detailed wording amendments	BEL2A - Accept: <i>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, <del>provided</del> <u>that it safeguards taking into account the historic characteristics of these heritage assets.</u></i>
18	Grosvenor Estate	NPA1	Suggests detailed wording amendments	NPA1 - Accept request to remove 'and adherence to' but consider it should be replaced with, 'and appropriate support for'. <i>b. Achieve recognition of and <u>appropriate support for adherence</u> <del>to</del> the Belgravia Sustainability Charter or any successor document.</i>
19	Grosvenor Estate	BEL3	Suggests detailed wording amendments	BEL3B – disagree. It is important that the policy establishes that these are predominantly residential areas given the WCP policy context (Policy 14).  BEL3C – accept. <i>C. Proposals must demonstrate that they will retain and, where possible, enhance the character of the area, <u>including through the retention or reinstatement of historical and/or architectural features.</u></i>  BEL3D – accept but note accepted rewording by WCC. <i>D. Development must be of a scale and massing that responds to and <del>preserves</del> <u>enhances</u> the setting of the character areas. <del>This also applies to development outside the character areas which could affect their setting.</del></i>
20	Grosvenor Estate	BEL5	Suggests detailed wording amendments	BEL5A-D – Disagree. This wording has been used in other made neighbourhood plans in Westminster, including the Pimlico NP.

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				Retaining the list of the specific views in the policy avoids confusion.
21	Grosvenor Estate	BEL7	Suggests detailed wording amendments	Disagree that 'reflect' should be replaced with 'have considered'. The reasoning is the same as for BEL1B.
22	Grosvenor Estate	BEL9	Suggests detailed wording amendments	Disagree. Due to the way that the Use Classes Order is now presented, it is important to be precise about the uses to which the policy relates.
23	Grosvenor Estate	BEL10	Suggests detailed wording amendments	<p>BEL10 Title – Disagree. The title proposed suggests that the policy is only about offices when it is about workspaces. The policy could be amended to make clear that it is about incubator/start-up business space.</p> <p>BEL10A – accept but note accepted rewording by WCC.  <i>A. Proposals to <u>deliver additional office floorspace and/or provide commercial space suitable for incubator/start-up businesses in the CAZ, Victoria Opportunity Area, Local Centres or Secondary Centres (shown on Figure 6.1), particularly on flexible leasing terms, will be supported in principle. Proposals for the refurbishment and improvement of existing office spaces within these areas will be supported in principle.</u></i></p> <p>BEL10C – Disagree. This is a brand new proposed clause in the policy which does not reflect the wider evidence gathered to support the BNP.</p> <p>BEL10D – accept.  <i>D. Where planning permission is required for changes of use at the ground floor level of office buildings, flexibility for a range of commercial uses (including retail, entertainment, medical and leisure) will be supported in principle, subject to the policy requirements set out in Policy BEL9.</i></p> <p>BEL10E – accept.</p>

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				<p><i>E. Development proposals should consider how they can maximise opportunities for carbon savings and biodiversity, particularly by way of improvement to plant and machinery, building materials and introduction of appropriate greening. Any proposals will need carefully to consider impact upon residential amenity (including noise and vibration), design and heritage. Proposals for any urban greening/planting should be accompanied by the submission of a management strategy which sets out how the greening/planting will be maintained in perpetuity.</i></p>
24	Grosvenor Estate	BEL14	Suggests detailed wording amendments	<p>BEL14(A)(a) – disagree. The policy provides sufficient flexibility.</p> <p>BEL14(A)(b) – accept inserted text but do not accept the need for the deletion of ‘(Policy BEL5)’. Note also the accepted separation of the sub-clause into 2 sub-clauses by WCC.</p> <p><i>A. b. Development should apply a design-led approach to optimise the use of land and meet identified needs for new housing, <del>and</del> workspaces and other commercial and community uses. The scale and character of the local built environment (including the prevailing context height and skyline) should be taken into account when considering the height, bulk and massing of any proposals.</i></p> <p><i>c. Development proposals should not harm Strategic Views or other views identified in this Neighbourhood Plan (Policy BEL5) and where possible should enhance them.</i></p> <p>BEL14C – do not accept deletion of reference to zero air emissions. There is no justification for why such an issue should not be referenced. Accept the inclusion of ‘where relevant and feasible’ as this provides appropriate balance.</p> <p><i>C. Proposals are encouraged to meet the highest environmental standards, including zero air emissions, as soon as possible and</i></p>

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				<i>to respond to the principles in the Belgravia Sustainability Charter, where relevant and feasible.</i>
25	Grosvenor Estate	Non-Policy wording (items 10-15)	Suggests detailed wording amendments	<p>It is unclear from the representations how these amendments would enable the Plan to meet the Basic Conditions, given that these are non-policy matters or actions. If the Examiner considers, in light of any amendments to policy, that non-policy wording should change, then those consequential changes should be made.</p> <p>The 'Pillars of the Plan' derive directly from public consultation and survey of local people and businesses. And as such they have strong support.</p>
26	TfL		We welcome the addition of a reference to TfL's Streetscape Guidance and London Cycling Design Standards (LCDS). However, it is disappointing that our previous suggestion to widen the scope or to add in another section setting out a positive approach to implementing Healthy Streets and encouraging active travel has not been pursued. This could include a range of positive measures that would benefit people who are walking, wheeling or cycling.	This was not an area raised and pursued by the community through the development of the Plan. Whilst a specific matter within the broader consideration of cycling, 51% of residents who responded to a specific question on this issue were opposed to improved facilities for through cyclists with only 21% in favour. As such, it would have been a significant risk to the Plan to seek to address general improvements to cycling without this being seen as trying to encourage through-cycling.
27	TTL Properties	BEL1B	Suggests detailed wording amendments	Disagree – the policy provides the appropriate flexibility regarding how buildings on the periphery can interpret the policy requirements.
28	TTL Properties	Fig 5.10	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.	Noted. This error should be amended.
29	TTL Properties	Design Codes report	Suggests detailed wording amendments	These amendments are accepted although it is questioned as to whether they are necessary (to an evidence base document) in order for the Plan to meet the Basic Conditions.
30	WCC	BEL1(B)	Suggests detailed wording amendments	BEL1(B) – Accept, noting the agreed amendments from Grosvenor.

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				<i>B. Proposals for new development and redevelopment of existing buildings in Belgravia must demonstrate how they have responded to the <del>requirements</del> <u>principles</u> of the Belgravia Design Codes (as summarised in Appendix A), <u>as relevant to the site and local context.</u></i>
31	WCC	Section 5.3.1.	Suggests detailed wording amendments	Accept <i>Whilst supporting WCC's ambition for energy-minimising new building designs... it is almost always more sustainable in terms of carbon footprint to <del>restore</del> <u>refurbish</u> and upgrade an existing building than to demolish and rebuild, i.e. to consider retrofit first.</i>
32	WCC	BEL2 and associated clauses	Suggests detailed wording amendments	BEL2(B) – accept deletion from the policy and its insertion in section 5.3.1 as a new 7 <sup>th</sup> paragraph. <i><u>Policy BEL2 could be achieved through measures to reduce heat loss. This could include heritage sensitive slimline double or triple glazing in conservation areas and listed buildings 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. It could also be achieved through the replacement of fossil fuel burning energy sources with electric power from renewable sources with zero air emissions locally.</u></i>  Section 5.3.2 (Belgravia Sustainability Charter) – accept. However, in respect of point 3, WCC may have misunderstood the point which is to avoid buildings that are all glass. The intention is not – and cannot reasonably be – to mean windowless buildings. <i>3. do keep glass window to wall ratios as low as possible to minimise solar heating and the need to cool artificially, <u>whilst also taking into account the need to provide natural light and other design related matters.</u></i>

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				<p><i>4. do design buildings <del>without installing equipment which produces heat and emissions (to minimise the requirement need for air-conditioning)</del>, <u>including through reducing the need for equipment that generates high levels of heat and/or emissions.</u></i></p> <p><i>5. do fit external sun shading devices to keep buildings cooler in summer (e.g. blinds and awnings), <u>taking into account any implications on listed buildings and/or Conservation Areas.</u></i></p> <p><i>10. do implement Sustainable Drainage Systems (SuDs) where possible (including rain gardens, permeable paving and other solutions) to prevent excess water in the main drainage system.</i></p> <p><i><u>11. do integrate the use of solar energy where appropriate and feasible.</u></i></p> <p><i><u>12. do utilise sustainable, recycled, or low-carbon impact materials in construction and renovation projects wherever possible.</u></i></p> <p><i><u>13. do provide facilities for cycling and electric vehicle charging stations to encourage the use of greener modes of transport.</u></i></p> <p><i><u>14. do design outdoor spaces that include greenery, such as gardens, green roofs, or living walls, to improve air quality and provide habitats for local wildlife.</u></i></p> <p><i><u>15. do install water-efficient appliances and fixtures, and consider systems for rainwater harvesting or greywater recycling.</u></i></p>
33	WCC	NPA1	Delete clause b given that it duplicates Policy BEL1C.	<p>NPA1 - Accept.</p> <p><del><i>b. Achieve recognition of and adherence to the Belgravia Sustainability Charter or any successor document.</i></del></p>
34	WCC	BEL3	Suggests detailed wording amendments	BEL3A - Accept

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				<p><i>A. The following are residential character areas in Belgravia</i>  <u>There are three residential character areas in Belgravia, namely:</u></p> <p>Then delete the 'B' in front of the following clause (i.e. so it all becomes part of Clause A).</p> <p>BEL3D – Accept but note accepted rewording by Grosvenor.  <i>D. Development must be of a scale and massing that responds to and <del>preserves</del> <u>enhances</u> the setting of the character areas. This also applies to development outside the character areas which could affect their setting.</i></p>
35	WCC	BEL4	Suggests detailed wording amendments	BEL4(b) – Accept <del>properly and fully</del> <u>adequately</u> address amenity issues that may arise during the construction activity on neighbouring properties;
36	WCC	BEL7	Suggests detailed wording amendments	Accept Proposals for the refurbishment of shopfronts or the design of new shopfronts <u>which require planning permission</u> , including awnings and projecting signs, <del>which require planning permission</del> must demonstrate how they reflect the relevant Belgravia Design Codes...
37	WCC	BEL9A	Suggests detailed wording amendments	BEL9A - Accept <i>A. Outside of the Local Centres, the two Secondary Centres and the Central Activities Zone (CAZ) (shown on Figure 6.1), <del>the</del> The Belgravia Neighbourhood Area is predominantly residential. <u>Outside of the Local Centres, the two Secondary Centres and the Central Activities Zone (CAZ) (shown on Figure 6.1), late night uses, including such as restaurants, cafes, public houses, bars, hot food takeaways and entertainment uses, outside these locations will generally be resisted.</u></i>
38	WCC	BEL10A	Suggests detailed wording amendments	BEL10A – Accept but note accepted rewording by Grosvenor. The BNF also confirms that flexible terms do relate to the terms of the lease. A. Proposals to <u>deliver additional office floorspace and/or</u> <del>provide</del> commercial space suitable for incubator/start-up



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				<i>businesses in the CAZ, <u>Victoria Opportunity Area</u>, Local Centres or Secondary Centres (shown on Figure 6.1), particularly on flexible <u>leasing terms</u>, will be supported <u>in principle</u>. <u>Proposals for the refurbishment and improvement of existing office spaces within these areas will be supported in principle.</u></i>
39	WCC	Section 7.3.1, 1 <sup>st</sup> para	Suggests detailed wording amendments	Accept <i>Trees are an important aspect of the attractiveness of Belgravia., though it should always be recognised that Belgravia is notable as a district primarily because of its historic buildings rather than on account of its planted environment. Nevertheless, <del>£</del>Trees help to contribute to the biodiversity and air pollution control of the area as well as reducing carbon emissions. The Belgravia Conservation Area Audit recognises the positive contribution by trees to the character of the area.</i>
40	WCC	Section 7.3.1(a)	Suggests detailed wording amendments	Accept <i>Many of the trees in Belgravia’s garden squares are London Plane trees which are considered by many to be quintessentially typical of London squares and scenery. In this regard they play an important role in defining the heritage and townscape of the squares. However, several of these have now grown to very substantial heights – potentially much larger than envisaged by the original designers of the garden squares. These large trees can have some unwelcome impacts, specifically: – They can grow to such a size that they obscure key architectural features and vistas of Belgravia – many overtop the average roofline. – Each year there is a heavy leaf fall which blocks drains and can cause slippery pavements. – Plane tree leaves are especially tough and, if not assiduously cleared, can take up to 5 years to decompose – In the spring/summer their seeds can cause allergies and breathing difficulties in those susceptible. Most of these trees are in the ownership of Grosvenor (NB excluding the small triangular garden at Chesham Place, which</i>

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				<p><i>is in private ownership). First and foremost, <del>tree</del> tree management is <u>may be</u> necessary where safety is at risk, often due to the instability caused by a diseased tree. Beyond this, <del>our</del> recommendations are that owners of garden squares in Belgravia be permitted to manage London Plane trees where such trees have become a nuisance or are damaging to residential amenity. In such circumstances, appropriate pruning should be the first option. In the event of tree removal where pruning has not been able to reduce the nuisance factor, trees other than plane trees, which can demonstrate a biodiversity benefit, should be planted in replacement. Permission must be sought from WCC and it is important that these matters are considered within the context of the wider issues with mature trees explained above.</i></p>
41	WCC	Section 7.3.1(b)	Suggests detailed wording amendments	<p>Accept</p> <p><i>Trees in private gardens are mostly protected by virtue of being in a Conservation Area or having a Tree Preservation Order. However, if a development proposal involves the removal of a <del>mature</del> mature tree (being a significant biodiversity asset), such loss of biodiversity should be a fundamental consideration when determining the planning application (although it should also be recognised that trees can contribute towards townscape, amenity, character and appearance of a conservation area). The Environment Act 2021 requires development to provide at least a 10% net gain in biodiversity from development proposals. Policy 34G of the City Plan requires this “wherever feasible and appropriate”. Thus proposals which involve the removal of valuable trees (i.e. trees that provide clear environmental and biodiversity benefits) but are unable to meet the 10% biodiversity net gain on site should only be permitted to remove these trees where the proposals directly address other key objectives in Westminster.</i></p>

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42	WCC	Section 7.3.1(c), 2 <sup>nd</sup> para	Suggests detailed wording amendments	Accept <i>In recent years trees have been planted in pavements in several areas of Belgravia. More recent developments, e.g. No. 1 Ebury Square, have planted trees along Ebury Street to compensate for the removal of mature trees which fell victim to the developer's space needs. Given the imperative for net biodiversity gain to be achieved from development, <u>as well as the need to optimise the city's canopy cover</u>, a similar approach is expected from Grosvenor's redevelopment of the Cundy Street site.</i>
43	WCC	Section 7.3.1(d), 1 <sup>st</sup> and 2 <sup>nd</sup> paras	Suggests detailed wording amendments	Accept <i>As a general principle the Plan resists the removal of <del>mature</del> <u>valuable</u> trees for the purpose of enabling development, <u>particularly mature trees</u>. Such trees have taken many years to reach their maturity and any new planting that replaces it is unlikely to reach the same levels of benefit in terms of biodiversity and carbon capture for decades at least. As is noted in the WCC Environmental SPD 2022 (p.51), 'It is important that as a first option trees should be retained. The retention of existing trees is more beneficial than tree removal and mitigating the loss with the planting of new trees'.</i>  <i>Developers will be required to demonstrate why the development necessitates the removal of such trees and how this is of benefit to local residential amenity, the character and architectural design of Belgravia and the environment generally. A Tree <del>Management</del> <u>Protection</u> Plan should be developed that seeks to preserve and incorporate <del>mature</del> <u>valuable</u> trees rather than remove them.</i>
44	WCC	BEL12A	Suggests detailed wording amendments	BEL12A - Accept <i>A. The tree population should be maintained in accordance with good arboricultural practice. <u>Where necessary</u>, it should be regenerated with healthy and diverse species with the aim of creating a balanced age structure that respects character and</i>

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				<i>heritage to maximise its <del>landscape</del> <u>the townscape</u> and amenity benefits to the Belgravia Neighbourhood Area over the long term.</i>
45	WCC	BEL12B	Suggests detailed wording amendments	BEL12B - Accept <i>B. In <del>addition to protecting trees of amenity, ecological and historic value, and those which contribute to the character and appearance of the townscape,</del> demonstrating a minimum 10% net biodiversity gain, <del>proposals for built development</del> <u>development proposals</u> must take full account of the loss of biodiversity caused by the removal of any trees. <del>In addressing the requirements of City Plan Policy 34G (Green infrastructure), it is considered that failing to meet the requirement for net biodiversity gain on sites where valuable trees are removed shall not be deemed 'appropriate' unless the proposals clearly meet other strategic objectives.</del></i>
46	WCC	BEL12C	Suggests detailed wording amendments	BEL12C - Accept <i>C. In the event of tree removal and replacement, <del>species that are most conducive to increasing biodiversity and most resistant to the impacts of the changing climate, e.g. drought, should be chosen provided these do not have a detrimental impact on the heritage or townscape of the area. The planting of replacement trees is preferred to the provision of other types of green infrastructure (see clause F) where feasible.</del> <u>new trees should be planted in accordance with the principle of 'the right tree in the right place' and should be selected according to criteria including:</u>  <ul style="list-style-type: none"> <li>• <u>Species diversity and biodiversity;</u></li> <li>• <u>Other ecosystem services, for example air quality, pollution absorption;</u></li> <li>• <u>Soil characteristics and below ground constraints;</u></li> <li>• <u>Size, form and canopy shape;</u></li> <li>• <u>Townscape heritage and urban design considerations;</u></li> <li>• <u>Suitability for specific site constraints and wider city environment;</u></li> </ul></i>

Item	Respondent	Policy/para/ theme	Summary of representation	Suggested response
				<ul style="list-style-type: none"> <li>• <u>Climate change resilience;</u></li> <li>• <u>Aesthetic qualities;</u></li> <li>• <u>Specific negative characteristics for example brittle branches or surface rooting; and</u></li> <li>• <u>Biosecurity.</u></li> </ul> <p><u>The planting of street trees is encouraged to follow the guidance provided by the 'Trees in the Public Realm' document (or any successor guidance) and the 'right tree in the right place' principles.</u></p>
47	WCC	BEL12D	Suggests deletion	BEL12D - Accept deletion
48	WCC	BEL12E	Suggests detailed wording amendments	<p>BEL12E – Accept (is now clause D, with subsequent clauses re-numbered)</p> <p><i>D. Landscaping proposals for <del>major</del> developments should seek to provide trees on-site and make suitable provision for their long-term maintenance. Demonstration of such provision through compliance with a submitted Tree Management Plan is encouraged.</i></p>
49	WCC	BEL13A	Suggests detailed wording amendments	<p>BEL13A – Accept</p> <p><i>A. Proposals to improve paved spaces (which may, where planning permission is required, include footways or carriageways) through the use of high-quality paving <u>where appropriate</u> and coal hole covers that are in keeping with that in the surrounding area and through reducing street clutter will be encouraged.</i></p>
50	WCC	BEL14(A)(b)	Suggests detailed wording amendments	<p>BEL14(A)(b) - Accept (with exception of reference to Policy BEL5), noting the agreed amendments by Grosvenor.</p> <p><i>A. b. Development should apply a design-led approach to optimise the use of land and meet identified needs for new housing, <del>and</del> workspaces <u>and other commercial and community uses</u>. The scale and character of the local built environment (including the prevailing context height and skyline) should be taken into account when considering the height, bulk and massing of any proposals.</i></p>

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				<i>c. Development proposals should not harm Strategic Views or other views identified in this Neighbourhood Plan (Policy BEL5) and where possible should enhance them.</i>
51	WCC	BEL14(A)(e)	Suggests detailed wording amendments	BEL14(A)(e) – Accept (is now sub-clause f) <i>Development should include the provision of publicly accessible open and green space as part of comprehensive landscaping proposals to enhance the local environment, including tree planting, <u>sustainable drainage systems</u> and appropriate softening of the edges of the site <u>where feasible</u>.</i>
52	WCC	CIL priorities	Suggests removal of one item (point 7)	The BNF considers that this should be retained but the point could be addressed by adding the wording at the end. <i>7. Replacing concrete and other temporary paving with high quality paving stones (NB this does not include repairs to pavements that have been damaged by construction, which should be the responsibility of developers/contractors/owners.) <u>Such replacements to be in line with WCC’s Standard Details for Highways.</u></i>
53	WCC	Design codes	Suggests amendment to Design Principle 1.4	1.4 – Accept <i>Consistent rooflines <del>are to</del> should be preserved with no visible structures or projections above the average roof or parapet height, Westminster City Plan Clause 40.11 should be noted in this regard.</i>
54	WCC	Design codes	Suggests amendment to Design Principle 8.4	8.4 – Accept <i>It should be recognised that basements in mews are not historically typical <u>and are generally discouraged.</u></i>
55	WCC	Design codes	Suggests amendment to Section 2.10	Section 2.10 – Accept <i>The biodiversity, sustainable urban drainage and contributions <u>to townscape and to public realm comfort which can be made by landscape within the urban environment... in additional urban greening.</u></i>
56	WCC	Design codes	Suggests amendment to Design Principle 10.4	10.4 – Accept <i>Larger scale developments should consider, and positively contribute to, the quality of the public realm. Good public realm design should be informed by the quality of public space, the</i>

Item	Respondent	Policy/para/theme	Summary of representation	Suggested response
				<i>potential for new permeability, the selection of appropriate ground floor uses and the importance of good microclimate conditions. The contribution to <u>amenity, townscape, biodiversity</u> and sustainable urban drainage provided by <u>trees and landscaping</u> should be recognised.</i>
57	Victoria BID	Mapping	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.	Unlike the CAZ and the VOA, which are planning designations, the BID is a different vehicle and is therefore less directly relevant to planning. However, the BNF has no objection to adding this to the mapping if felt appropriate.
58	Victoria BID	Introduction	The plan should also make explicit in the body text that part of the Belgravia Neighbourhood Area is a designated Business Improvement District.	This is accepted although if reference is made, then it needs to acknowledge that the BID area only covers a small part of the Neighbourhood Area.
59	Victoria BID	Non-Policy Actions	Various comments	We have no comment on these as they are not material to considering whether the Plan meets the Basic Conditions
60	Victoria BID	BEL2	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.	It is considered that the BNP is clear about the Charter in terms of the principles it espouses and how these should be applied (through Policies BEL1, BEL14 and Non-Policy Action 1). WCC has made no mention of the Sustainable City Charter in its representations and is very supportive of the Belgravia Sustainability Charter.
61	Victoria BID	BEL3	The list of character areas noted in draft policy BEL3 should be expanded to include non-residential character areas such as the more mixed-use areas such as Buckingham Palace Road and environs.	The character areas in BEL3 were identified because they all comprise small /intimate streets with almost no commercial activity currently, which leads to them having a common theme of being 'predominantly residential'. It is considered that the Design Codes and CAA provide sufficient guidance in respect of the mixed use parts of the Neighbourhood Area. Indeed, to determine the character of an area as diverse as Buckingham Palace Road would be extremely challenging.
62	Victoria BID	BEL3	Suggests detailed wording amendments	Suggestions for alterations to Policy BEL3 have been submitted

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				by WCC which the BNF considers are more appropriate. It is also noted that none of the defined character areas covered by BEL3 are in the Victoria BID area.
63	Victoria BID	Fig 5.8	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.	The justification for these views is included in the supporting evidence.
64	Victoria BID	BEL8	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.	Whilst the point is acknowledged, it is difficult to know how the policy can satisfactorily address such a specific matter.
65	Victoria BID	BEL10	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.	The amendments proposed by Grosvenor to BEL10A is considered to satisfactorily address this point (coupled with the BNF's response on matters such as the policy title).
66	Victoria BID	BEL11	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.	This is not a matter for planning policy. Such considerations are at the discretion of the owners.
67	Victoria BID	BEL12	The policy should be modified to encourage new tree planting throughout the neighbourhood area as a general principle.	The BNF considers that the amendments suggested by WCC address these matters satisfactorily.



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68	Victoria BID	BEL14	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.	The BNF does not currently have enough information to refer to this project. Moreover, it is a concept masterplan only and would be principally outside the Neighbourhood Area focusing on the station and its tracks.
69	Victoria BID	Design Codes	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.	A definition of 'peripheral' could be provided in the Design Codes if this would help the plan to meet the Basic Conditions.
70	Victoria BID	Design Codes	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.	This or equivalent definition of 'peripheral' could be provided in the Design Codes if this would help the plan to meet the Basic Conditions.
71	Victoria BID	Design Codes	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.	The BNF disagrees that the Plan needs any such clarification. Moreover, it disagrees that it simply does not apply in the VOA as there is no strategic policy that clearly directs this.

## Other comments

Item	Respondent	Theme	Summary of representation	Suggested response
72	Liam Hennessy/ Terrence Bendixson	New vision for Hyde Park Corner/ other traffic amendments		This subject is considered to be out with the scope of the Plan given that it affects highways and the general traffic system rather than a local planning issue.
73	Westminster Cycling Campaign	Low traffic n'hoods		<p>Whilst the BNF is in sympathy with the benefits of LTNs, it does not wish to recommend such explicitly in the Plan because:</p> <ul style="list-style-type: none"> <li>a) considerable traffic evaluation and local consultation is required before such a scheme can be considered; and</li> <li>b) recent negative experience of and bad publicity for LTNs would make their specific inclusion in the Plan contentious (with the BNF required to pass a referendum in the relatively near future in order to be made).</li> </ul> <p>It also does not consider that a non-policy action is necessary for any plan to meet the Basic Conditions.</p>
74	London Parks & Gardens	5.11	Consult the Gardens Trust regarding Hyde Park Corner	Noted
75	London Parks & Gardens	Garden Squares	The Neighbourhood Plan is proposing to limit the public access to the garden squares throughout the conservation area, ensuring their primary function remains as private space for local residents. Our recommendation is for all the squares to participate annually in LPG Open Gardens weekend.	These are private squares so it is not within the gift of the Neighbourhood Plan to limit public access to them. We are aware that Grosvenor does make some of their gardens available to the public from time to time as part of this scheme.
76	London Parks & Gardens	Open spaces	The suggestion to construct a children's play area in Ebury Square of concern. The square is protected under the London Squares and Preservation Act 1931, although the play area would be considered as a structure connected to the recreational use of this space, it could impact the original layout of the square. Our recommendation is to consult TGT on the proposals that are part of the Grosvenor's Cundy Street	<p>The proposal for a play area in Ebury Square is Grosvenor's not the BNF's. It is Grosvenor who should have consulted the TGT.</p> <p>The BNF shares TGTs concern regarding this proposal and consider that any play space that Grosvenor have planned as part of their redevelopment scheme should have been included within the footprint of the development not in a public square.</p>

Item	Respondent	Theme	Summary of representation	Suggested response
			Quarter redevelopment and future proposals for play areas as noted in POLICY BEL11: SPACE FOR PLAY AND GROUP SOCIAL ACTIVITIES pg.78.	The BNF suggests that any confusion in the Plan relating these proposals could be addressed by deleting the sentence in brackets at the end of p76.
77	Historic England	BEL2	Suggests detailed wording amendments	BEL2(A) - Accept <i>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 safeguards the historic characteristics and conserves the significance of these heritage assets.</i>
78	Historic England	5.5	The Forum will be aware of an in-built tension between the proposed plan and the Westminster City Plan regarding tall buildings. 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	The point is noted. Whilst the BNF does not object to the inclusion of reference to WCP Policy 41, it questions whether it is appropriate to be referencing other parts of the development plan unless it is absolutely necessary. WCC has not suggested that such text is necessary.
79	Historic England	Non-policy action 2	Suggests detailed wording amendments	Accept
80	Historic England	BEL8	Suggests detailed wording amendments	Accept
81	Historic England	Reference	Reference to Streets for All requested.	Accept
82	Historic England	8.1.2	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 may 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.	It is recognised that the title of this section is potentially slightly confusing. The intention is to illustrate how development can be informed by its local setting where it is located in areas of strong heritage, thus there is a need to demonstrate how it has responded to the heritage significance of its surroundings. The need to refer to heritage significance is therefore supported. However, it may be clearer if the title is amended to 'Examples of development responses in heritage-sensitive areas'.
83	Michael Field		Paving slabs	The point is acknowledged. However, this must be aligned with WCC's direction on use of only low carbon paving solutions (see WCC representations on Section 5.3.2 and Section 9).

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84	Michael Field		Street furniture and excessive signage	The point is noted. This has already been highlighted in the evidence paper on street clutter.
85	Michael Field		Traffic noise	This issue is outwith the scope of the BNP.
86	Environment Agency	BEL12C	Tree species must be native to the local area to ensure no negative impacts on native wildlife	The question arises as to how local a tree species should be. This is too simplistic and disregards, for example, that the 'native' London plane tree is not a significant habitat for biodiversity. There are many species of tree from further afield than the local area which will have a positive impact on native wildlife. The BNF has accepted the recommended changes by WCC which it considers sufficient.
87	K'bridge NF	BEL2	The KNF recommends that the BNP refer to "heritage sensitive slimline" double or triple glazing. The BNP might also allow other materials for window frames subject to Historic England's guidance.	Accept. BEL2B(a) could be amended to make reference to 'heritage sensitive slimline double or triple glazing' or equivalent (subject to Historic England guidance).
88	K'bridge NF	Sustainability Charter	The Sustainability Charter could be strengthened through the inclusion of a supporting 'energy hierarchy'	The point is noted although it is considered that there could be confusion over the relationship between the charter and the energy hierarchy (what 'trumps' what?).
89	K'bridge NF	BEL4	Please require construction to mitigate and minimise all air emissions (i.e. not only dust) such as through the use of electric or hydrogen powered construction equipment unless this is not available.	Agree. BEL4a could be amended to refer to 'air emissions (including dust)'.
90	K'bridge NF	BEL7	Please consider including policy wording to restrict advertising (at street level and above)	Agree. This could include a new clause (B) to BEL7 which would say, 'Proposals to display advertising which require planning permission should not have a detrimental impact on the amenity of the area or obstruct pedestrian routes.'
91	K'bridge NF	BEL9	Is the reference to alfresco service in Policy BEL9(B) intended to encourage or manage alfresco activities?	The point is noted and the intention is not to encourage. It may be better if the wording is amended to, 'Such impacts include, but are not limited to noise, litter, odours and tables and chairs and equipment on the street <del>to support</del> <u>required for</u> alfresco service.'
92	Josephine Ohene-Djan	Plan-wide	Seeks more detail of accessibility for the disabled communities	The points made are noted and welcomed. Through the process of developing the BNP, the BNF sought to engage widely with all groups. Whilst no specific groups representing disabled communities were identified, a number of members of the Steering Group are, due to their age and associated limited

Item	Respondent	Theme	Summary of representation	Suggested response
				<p>mobility and sight, more challenged by issues such as negotiating pavements and busy streets and different transport needs, etc. These issues have, as far as reasonable, been reflected in the plan, albeit without the explicit recognition that they are also intended to improve support for the needs of the disabled community. It is unfortunate that these matters have only been brought to the BNF's attention at the Reg 16 consultation stage. In this regard it is not clear what changes are sought in order that the BNP satisfactorily addresses these observations.</p> <p>As a minimum, it is agreed that the phrase in the Belgravia Design Codes document in Section 2.10 could have been more sensitively phrased. The BNP suggests that the final sentence of the 4<sup>th</sup> paragraph is replaced with the following, '<u>...is well recognised. These codes strongly support investment in additional urban greening taking account of heritage constraints and encouraging full accessibility for all.</u>'</p>

93	<b>Erratum</b>		Fig 6.2 Ground Floor uses	The property (37-39 Bloomfield Terrace) is incorrectly designated as 'education' rather than 'residential' in the map showing ground floor uses. This should be corrected.
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