

INDEPENDENT EXAMINATION OF THE PIMLICO NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc(Econ) MSC MRTPI

Peter Ruback
Chair Pimlico Neighbourhood Forum

Marina Molla' Bolta
Westminster City Council

Examination Ref: 01/JK/PNP

27 October 2021

Dear Mr Ruback and Ms Molla' Bolta

PIMLICO NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Pimlico Neighbourhood Plan (the Plan/PNP) for examination, I would like to clarify several initial procedural matters.

1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the Plan, I have not at this initial stage identified any very significant and obvious flaws in it that might lead me to advise that the examination should not proceed.

2. Site Visit

I intend to undertake a site visit to the neighbourhood plan area in early November 2021. This will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

3. Written Representations

At this stage I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. Nevertheless, I will reserve the option to convene a hearing should a matter or matters come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

I have a number of initial questions seeking further clarification from the Neighbourhood Forum, set out in the Annex to this letter. I would be grateful if a written response could be provided **within 3 weeks from the date of this letter**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan.

However, in view of the additional information which I have requested I must provide the opportunity for you to reply. Consequentially, the examination timetable will need to be extended. Please be assured that I will seek to mitigate any delay as far as is practicable. The IPe office team will keep you updated on the date of my site visit and the delivery date of the draft report.

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 any subsequent response is placed on the Neighbourhood Forum and Local Authority websites.

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner

Annex

Having read the submission version of the Pimlico Neighbourhood Plan, April 2021, the background evidence and the responses from local parties and stakeholders to the Regulation 16 consultation exercise, I have a number of questions for Pimlico Neighbourhood Forum. I have requested the submission of a response **within 3 weeks from the date of this letter**.

1. Westminster City Council (WCC), in its letter to the Forum of 23rd August 2021, stated that it had some areas of concern, and that the following policies in the PNP did not meet the Basic Conditions: Policies PIM1, PIM3, PIM4, PIM5, PIM7, PIM9, PIM11, PIM13, PIM14, PIM15, PIM16, PIM17 and PIM24. The Appendices to the letter from WCC set out many proposed changes to policies and wording, which are considered necessary to satisfy the Basic Conditions for plan-making. WCC is the local planning authority for Pimlico, and it adopted a new Westminster City Plan in April 2021, with which the PNP will have to achieve general conformity in relation to the strategic policies. WCC determines planning applications for proposed development in Pimlico, so that it has significant interest in the content of the PNP. I propose that the Pimlico Neighbourhood Forum liaises with WCC and provides a detailed response to the concerns raised by WCC in its Regulation 16 consultation comments. It would greatly assist my examination if the Forum and WCC would produce a Statement of Common Ground, setting out in detail the modifications to the PNP which they would be willing to take forward, (with comment as necessary on any proposed modifications which the Forum or Westminster would not support).
2. Transport for London (TfL) commented that the PNP made no reference to the Mayor of London's Healthy Streets Approach, to Vision Zero or targets to increase active travel and public transport use. The PNP does not mention parking provision in new developments, and the expectation for car-free development (except for disabled persons). TfL expressed its support for Policies PIM19 and PIM22, whilst observing that Vauxhall Bridge Road forms part of the Transport for London Road Network where any proposals for works would need to be discussed with TfL. Please would the Forum suggest modifications to the submitted PNP to take account of TfL's comments (or explain why they might consider modifications to be unnecessary)?
3. Regarding Policies PIM20 and PIM21, the Port of London Authority drew attention to the need for riparian life-saving infrastructure for any new development or enhancement of the public realm. Regarding the potential crossing from Nine Elms to Pimlico, the Port of London Authority must be involved in any decisions on proposals, including the public realm and walking and cycling connections. Should the PNP be modified to explain the role of the Authority more fully, and/or refer to "A Safer Riverside Guidance" for development alongside the Tidal Thames?
4. Simon Birkett, on behalf of Clean Air in London and the Knightsbridge Neighbourhood Forum, proposed some modifications to Policies PIM18, PIM19 and PIM23, and the addition of a reference to the Pimlico local heat network. It was also suggested that Policies PIM20 and PIM21 should encourage high environmental standards. In addition, Ian Benson described the PNP as "very deficient as it does not aim for carbon neutrality", recommending adoption of the Centre for Alternative Technology's Carbon Zero Britain report. Should the PNP be modified to take account of these concerns, and if so, how exactly?
5. ROK Planning on behalf of 4C Hotel Group queried whether the 2040 Vision for Pimlico, beginning with "continue to maintain the quiet village atmosphere and its largely residential nature", was appropriate. Given Pimlico's urban grain, public realm, streetscape, demographics and accessibility to services, the accuracy of the description is questioned. National planning policy aims to contribute to the achievement of sustainable development, ie. to foster or mould development in a positive manner rather than "maintain" the status quo. Should the Vision be modified in the light of these observations?

6. ROK Planning criticised Policies PIM2, PIM3 and PIM11, notably because development schemes would be expected to have “regard to the openness of the skies, the consistent scale of building heights and the regularity of the roofline when seen from street level ...”. Policy PIM3, which includes the aim that extensions in the Pimlico Conservation Area should generally be in mansard form, is perceived as too prescriptive, and not to allow for alternative designs to extensions depending on site-specific characteristics. PIM11: Tall Buildings was also seen to be too restrictive, and not in general conformity with Policy 41(D) and paragraph 41.9 of the Westminster City Plan. Montagu Evans on behalf of Vitcorp Ltd also criticised Policy PIM11, as well as Appendix 1 – Building Heights and Upward Extensions, and Maps 9 and 10. It contended that the inclusion of “reference heights” was inconsistent with London Plan Policy D9, as well as City Plan Policy 41. Please would the Forum advise whether the PNP should be modified to take account of these arguments, and if so, how exactly?

7. On behalf of Network Rail, CBRE advised that a new masterplan named Future Victoria is being prepared for the area around and behind Victoria Station. Most of the masterplan area is outside Pimlico, but the PNP area does include land to the south of Warwick Way and east of Peabody Avenue. Should the PNP be modified to acknowledge the Future Victoria project? Should Policies PIM11, and 13-15, be modified as proposed by CBRE to reflect the likely regenerative and townscape effects of the project?

8. ROK Planning proposed modifications to Policy PIM10: Shopfronts and Signage (including Hotels) and Policy PIM16: Hotels and short-term let properties. As the London Plan confirms, hotel and visitor accommodation are critical parts of London’s infrastructure and economic wellbeing. Tourism is a key feature of economic growth in the Central Activities Zone. Should the PNP be modified to take account of these comments and, if so, how exactly?

9. Montagu Evans on behalf of Vitcorp Ltd referred to the planning appeal, APP/X5990/W/21/3275399, relating to development for additional commercial floorspace at 52-73 Wilton Road. Montagu Evans referred to Policy PIM22: Wilton Road/Warwick Way public realm, Policy PIM24: Major development and the Queen Mother Sports Centre, and the proposed supporting text. Should the PNP be modified to take account of the representations made on behalf of Vitcorp Ltd, and if so, how?

10. Should the PNP focus more on Southern Pimlico, as requested by Colin Baker in his response to the Regulation 16 consultation exercise?

11. Mike Wyeld described some difficulties (noise and light intrusion) on Peabody Avenue for residents living close to the basketball courts between Peabody Avenue and Turpentine Lane. Should this matter be addressed in the PNP and, if so, how exactly?

12. Does the PNP have full regard for recent updates made to the Government’s National Planning Policy Framework (July 20 2021), to the Use Classes Order (new Class E1 1 September 2020), the publication of the National Model Design Code, to the new London Plan (adopted in 2021) and Westminster City Plan (adopted 21 April 2021)? Are any modifications required to ensure that the PNP is up-to-date? For example, paragraph 50 of the PNP appears to refer to paragraphs in an earlier version of the NPPF.