



Examination Ref: 01/JK/PNP

16 November 2021

Jill Kingaby BSc(Econ) MSC MRTPI

Dear Ms Kingaby,

Thank you for your letter of 27 October 2021.

You put 12 questions to the Pimlico Neighbourhood Forum (PNF) in the Annex to your letter. At the end of this letter is our substantive response to items 2-12.

Clearly the largest amount of work relates to item 1 and specifically the need to liaise with Westminster City Council (WCC) and respond to the points they have made in the Reg 16 consultation in a Statement of Common Ground. We had already started this work before you were appointed and we continue to do so.

We have met with Officers at WCC today and would like to suggest that in the SoCG we cover points of agreement and disagreement with proposed drafting for the policies you have raised i.e. those where WCC has stated that the Pimlico Neighbourhood Plan (PNP) does not meet the Basic Conditions. We would put this in the form of:

- a table showing drafting of changes agreed between PNF and WCC to the Policies;
- a table showing WCC and PNF's proposed drafting (perhaps with reasons) where we disagree about the Policy drafting.

We have also agreed to cover in the SoCG the policies WCC provided comments on in Appendix 2 of the council's Regulation 16 response, even if WCC stated that they were not necessary for the Pimlico Neighbourhood Plan (PNP) to meet the Basic Conditions. We will follow the same approach as above.

It was agreed by PNF and WCC officers that we would then need to propose consequential changes to the "reasoned justification" depending on what you decide about the Policies themselves; this is in order that policies in the PNP are not supported by inconsistent or misleading text. This could only be done after you assess if modifications are necessary (and perhaps once the Examiner's Report has been published) and therefore we would be grateful if you could confirm that such an approach is acceptable.

If you are content with this approach, then we have agreed with WCC that a realistic timeline for both parties to be able to get a SoCG agreed and to you is by 14 January 2022 although we will endeavour to complete this earlier if at all possible.

Yours sincerely,

Peter Ruback

Chair Pimlico Neighbourhood Forum

1.	<p>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).</p>	<p>We are in the process of agreeing a Statement of Common Ground which addresses the points in WCC's letter to the Forum of 23 August 2021</p>
2.	<p>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)?</p>	<p>PIM 22 and PIM 19 support an improved environment for pedestrians The PNF would question why the PNP should duplicate matters which are already in strategic policy. Policy T6 of the London Plan provides car parking standards including car-free residential development and Policy T2 on Healthy Streets requires development proposals to demonstrate how they will deliver improvements that support the 10 Healthy Streets indicators. The PNP's focus, reflecting the matters of concern to the local community, is more on enhancing the public realm. The PNF would be happy to include supporting text which makes clear that enhancing the public realm will help to meet the Healthy Streets approach and increase active travel. However, in addition because of the limited on-street parking in the Pimlico Neighbourhood Forum Area we would support wholly new major developments (i.e. other than conversions or extensions of existing residential properties) having no, or very limited access to on street</p>

		<p>parking permits, secured by planning conditions. Beyond this the PNF would be concerned that any modifications to policy to make explicit links to strategic policy would divert from the main intentions of the public realm policies.</p> <p>Regarding PIM19 and PIM22, the supporting text to each could state: <u>“Vauxhall Bridge Road forms part of the Transport for London (TfL) Road Network where any proposals for works would need to be discussed with TfL.</u></p>
3.	<p>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?</p>	<p>The PNF agrees with this suggestion to explain the role of the Authority and refer to the guidance.</p>
4.	<p>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?</p>	<p>These matters were not raised as fundamental matters by the community of Pimlico as part of the preparation of the plan. Also, strategic policy in the Westminster City Plan already reflects the target for Westminster borough to be net zero carbon by 2040. However, in respect of PIM20 and PIM21, the PNF agrees that it would be appropriate for these policies to encourage high environmental standards in their design:</p> <p>PIM20: <u>“Proposals for a bridge crossing the Thames between Nine Elms (ie the south side of the river between Vauxhall Bridge and Chelsea Bridge) and Pimlico must ensure that the amenity of residents and businesses in Pimlico is maintained and is encouraged to meet the highest environmental standards of design and materials. In particular such proposals...”</u></p> <p>PIM21: <u>“A. Development proposals on or immediately adjacent to the riverside are expected to maintain the open feel of the area, particularly in the areas of public realm. Proposals that enhance the general public’s enjoyment of the riverside and meet the highest environmental standards</u></p>

		<i>of design, materials and waste minimisation will be encouraged.”</i>
5.	<p>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?</p>	<p>The PNF considers that the vision is wholly accurate and reasonable and should not be amended. Obviously the village is urban, but it is primarily residential and has specific characters in the 4 conservation areas, each of which is more than a development at a specific time, but a community. The description of a “village” is an almost universally held view of the residents who responded at an early stage in our consultation. The fact that it borders an area of major commercial activity and development in Victoria should not mean that ‘sustainable development’ need be interpreted as allowing the creep of such a fundamentally different pattern of land use into an area, particularly one of such rich heritage and character, or permitting some sort of transition that doesn’t respect the character of the Village. The plan recognises that the area is popular with tourists and encourages their presence through its policies relating to public realm. The PNF would also observe that the vision was developed in collaboration with the local community of residents and businesses. The wording for the vision in the plan reflects the balance of views.</p>
6.	<p>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?</p>	<p>PIM3 and PIM11 reflect issues raised by WCC that will be addressed in the Statement of Common Ground. PIM2 is not considered to be overly prescriptive. It is intended to guide an applicant as to the most relevant matters in considering the townscape of Pimlico and the specific views across it</p>

7.	<p>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?</p>	<p>Network Rail identified that it is working on a new 'concept masterplan'. There is no detail provided, nor has Network Rail engaged with the process of preparing the PNP. Network Rail was consulted at Reg 14 stage and did not respond then. It is not clear what the justification would be for a neighbourhood plan that has reached a relatively advanced stage to be amended to reflect what may or may not be in a concept masterplan which could change at any time and has not had the benefit of planning permission or endorsement through any document in the development plan. The PNF is concerned that, in making representations on one concept masterplan, it would need to ensure that reference is made to any others elsewhere on the boundary of the Pimlico Neighbourhood Area and that a judgement would have to be made as to whether such a masterplan had reached a stage where it could be justified for inclusion. In addition the City Plan identifies the Victoria Opportunity Area where specific policies apply for the regeneration and redevelopment of Victoria Station and surrounding area. The VOA does not include railway land (or any other land) in the Pimlico Forum area and the approach of CBRE seems to seek extending the VOA to land in the Pimlico Neighbourhood Forum area.</p>
8.	<p>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?</p>	<p>PIM10 seeks to ensure high quality design. ROK Planning appear to suggest that high quality design in signage should not apply to unlisted buildings which is contrary to the NPPF. Moreover, PIM10 does not suggest that poor quality later additions should be restored. To avoid confusion, PIM10 could be amended to read: <i>"Development proposals for new or replacement shopfronts, signage or lighting to non residential premises (including hotels) should demonstrate high quality design and, where relevant, retain or enhance the character of the shopping frontage and, where relevant, the Conservation Area within which they are located. Support will be given in particular to the following design features which are considered to demonstrably retain or enhance character:..."</i></p>

		<p>The detail about matters such as architectural detail is contained in the Conservation Area Audits and the Pimlico Design Guide. This could be added to the supporting text.</p> <p>PIM16: The PNF agrees that the policy would more clearly be in general conformity with Policy 15 of the Westminster City Plan if it clarified what the commercial areas of the CAZ in Pimlico are. In this regard, these are considered to be the CAZ retail cluster, the 3 Local Centres and the Pimlico Parades. All other parts of the Neighbourhood Area are considered to be predominantly residential in nature. The supporting text to Policy PIM16(C) could make this clear.</p>
9.	<p>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?</p>	<p>The PNF recognises that certain amendments to PIM24 will help the policy to meet the Basic Conditions. The issues raised align with those raised by WCC in its representations and these are addressed in the Statement of Common Ground. For avoidance of doubt, the QMSC site/block is not 'allocated' in the PNP. Policy PIM24 seeks to provide a set of development principles were the site to be developed. This reflects its importance to the local community as a leisure facility.</p>
10.	<p>Should the PNP focus more on Southern Pimlico, as requested by Colin Baker in his response to the Regulation 16 consultation exercise?</p>	<p>The PNP has policies that cover Southern Pimlico in relation to the riverside and the protection of the Local Green spaces. We also have Pimlico wide policies on uses and on design (whether in or outside the conservation areas) and we have listed as NDHAs several buildings in Southern Pimlico. The PNF sought to engage as widely as possible in the development of the PNP. This is described in detail in the Consultation Statement. The PNP addresses the matters raised by the community during the development of the PNP. We do not think that this concern demonstrates that the PNP does not meet the Basic Conditions.</p>
11.	<p>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?</p>	<p>This is a very specific matter relating to the management of noise and lighting of an existing facility. As such it is not strictly a planning matter. The Westminster City Plan has policies which address this for</p>

		new development. It is therefore not considered necessary to amend the PNP.
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.	The PNP was modified during its development in respect of the change to Use Classes and the Westminster City Plan. We acknowledge that the Plan may require updating on certain matters relating to the 2021 NPPF. These will be addressed in the Statement of Common Ground.