

Statement of Common Ground between Westminster City Council and the Pimlico Neighbourhood Forum

Introduction

This Statement of Common Ground has been prepared jointly between Westminster City Council ('WCC') and the Pimlico Neighbourhood Forum ('the Forum'). It has been prepared to assist the Examination of the Pimlico Neighbourhood Plan ('the Plan'), by informing the Examiner of areas of agreement and disagreement between both parties.

Background

As part of the Regulation 16 Public Consultation on the Pimlico Neighbourhood Plan, WCC submitted a comprehensive response to the Plan. WCC considered that most of the Plan meets the Basic Conditions set out in the Town and Country Planning Act 1990 (as amended) and the Neighbourhood Planning (General) Regulations 2012 (as amended).

However, concern was raised over some of the policies in the plan and interpretation of some aspects of planning guidance and regulation. As part of the procedural matters, the Examiner requested that WCC and the Forum collaborate on a Statement of Common Ground to set out the modifications that are agreed by both parties and the reasoning for areas of disagreement.

This Statement of Common Ground has three different sections.

Section 1 - Outstanding issues / Key disagreements between WCC and the Forum

There remain a number of policies and supporting text where the council have identified outstanding conformity issues with higher tier plans. All outstanding issues where WCC disagrees with the Forum are set out in Section 1 below. The Pimlico Neighbourhood Forum has also provided its response to these issues.

Section 2 - Proposed modifications agreed between WCC and the Forum

The council and the Forum have agreed to amend a number of policies and paragraphs. WCC is content these changes bring the policies in accordance with higher tier plans and help some policies meet the Basic Conditions. All agreed changes between WCC and the Forum are set out in Section 2 below.

Section 3 – Other proposed modifications suggested by WCC

The council has prepared a schedule of further changes that are recommended to improve the effectiveness of the plan, particularly with regards to Paragraph 16D of the NPPF to ensure the policies in the plan are clearly written and unambiguous, as pointed out by the Examiner in her letter. The Pimlico Neighbourhood Forum has also provided its response to these recommendations. The recommendations are set out in Section 3 below.

Signed on behalf of Westminster City Council		
Name	Signature	Date
Michael Clarkson City Planning Policy Team Leader		10 th February 2022

Signed on behalf of Pimlico Neighbourhood Forum		
Name	Signature	Date
Peter Ruback Chair Pimlico Neighbourhood Forum	<i>P.J. Ruback</i>	11 th February 2022

Section 1 – Outstanding issues / Key disagreements between WCC and the Forum

Policy/Paragraph Number	WCC Comment	PNF Response
Chapter 1		
<p>Paragraph 2</p>	<p>The Forum wishes to add at the end of the paragraph a new sentence which is not needed and may cause confusion. Moreover, the Neighbourhood Planning PPG is clear that policies within Neighbourhood Plans should deal with land use issues and development within the designated Neighbourhood Area. Cross-neighbourhood boundary impacts will be managed by strategic policies. Finally, it is for the decision-maker to decide what a material consideration is when assessing an application.</p> <p><i>Paragraph 2 does not meet the Basic Conditions as it is not in accordance with national policies and guidance.</i></p>	<p>WCC queried whether the PNP could apply at all outside the Forum Area. PNF believe Policies can be a material consideration for developments outside our area, for example proposals which have an effect on setting or townscape. Therefore they should be taken into consideration and given appropriate weight. Our understanding is that Neighbourhood Plans are absorbed into the Development Plan without qualification.</p> <p>PNF proposed sentence at the end of Paragraph 2: Policies are also a material consideration for applications adjacent to the Pimlico Neighbourhood Area where implications could be felt in the area.</p>
Chapter 2		
<p>PIM1 E</p>	<p>As set out in the council's Regulation 16 response, PIM1 E is too restrictive and could be more positively worded. We would particularly question whether the penultimate hours are overly restrictive for some uses, including pub uses and could have implications for their viability due to implications on final serving times. As drafted, PIM1 E does not contribute to sustainable development (the use of the word "operation" is too restrictive) and is contrary to economic City Plan policies, including City Plan Policies 13, 14, 15 and 16. To note is that the Knightsbridge Neighbourhood Plan policy KBR15 which has a similar hours of use condition, excludes this blanket application for some uses, including pubs.</p> <p>WCC proposed change for PIM1 E: E. In order to protect residential amenity, uses Proposals for new main town centres uses within the Local Centres and the Pimlico Parades will be expected to avoid minimise</p>	<p>The PNF would like to retain PIM 1 E as submitted.</p> <p>This is a very important policy as the commercial units in the Local Centres and Pimlico Parades are next door to and underneath residential properties. These centres are small and therefore only minimal late night/early morning noise, etc, is required to have a significant impact on residential amenity. They are therefore not appropriate locations for the types of pubs/bars/etc that rely on late night opening to operate as viable businesses. By contrast, the Knightsbridge International Centre, by its nature, is a more suitable location for viable late night businesses, hence the difference in approach. Moreover, Knightsbridge Neighbourhood Plan Policy KBR15B still requires pubs, etc, to have no adverse impact on residential amenity which would need to consider its hours of operation.</p>

	<p>adverse impacts created by either early morning or late-night activity. Such uses will only be supported where there is a cConditions will be used to control their hours of operation. attached to the permission prohibiting their operation between 11pm and 7am on Monday to Saturday inclusive and before 7.30am and after 10.30pm on Sunday.</p> <p><i>PIM1E does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.</i></p> <p><i>PIM1 E does not contribute to the achievement of sustainable development.</i></p> <p><i>PIM1 E should be redrafted to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF.</i></p>	
<p>PIM1 G</p>	<p>As set out in the council's Regulation 16 response, PIM 1 G should be clarified and explicitly say to which uses it applies in order for the policy to be effective. It is unclear which changes of use PIM 1 G is trying to manage and it is therefore difficult to assess if it is fully in accordance with requirements set out in the City Plan for different types of uses (see City Plan strategic Policies 13 and 16). If the policy is aiming to prevent the loss of main town centre uses to residential uses, this should be made clearer within the policy. PIM1G is ambiguous and too onerous: applicants cannot be required to market the units for alternative uses. PIM1 Gb (both as submitted and the PNF SoCG version) is also too onerous and not in accordance with London Plan and City Plan policies, which do not set out how marketing should be assessed. PIM1 (both as submitted and the new version proposed in the SoCG) could inadvertently promote residential conversion when this is contrary to City Plan policy and would not be appropriate for the commercial frontages. The inclusion of the 18-month marketing test for retail is not in the City Plan and introducing it potentially weakens the council's</p>	<p>The PNF proposes revised wording which they believe strengthens the policy, addresses the Council's concern and is needed as loss of town centre uses has been widespread in the Pimlico Parades due to the higher values obtained by redeveloping Class E uses as residential properties for which owners can afford to maintain long voids to justify such change of use.</p> <p>PNF proposed change for PIM1 G: <u>G. In the CAZ Retail Cluster, Local Centres and Pimlico Parades, P</u>proposals for uses other than those provided considered generally acceptable in the retail centres for in A) and B) must clearly demonstrate that the an existing or acceptable alternative use or any other permitted by A) or B) and not excluded by C) are is not viable. As a minimum, both of the following criteria must be satisfactorily addressed by:</p> <p>a- The use of the existing establishment and acceptable alternative uses have been actively marketed as such for a period of not less than 18 months. Actively marketing all such uses for a period of not less than 18 months and</p>

	<p>position when trying to resist changes of uses (see City Plan paragraphs 14.5 and 14.6).</p> <p>WCC proposed change for PIM1 G: G. Proposals for uses other than those considered generally acceptable in the retail centres must clearly demonstrate that an existing or acceptable alternative use is not viable. As a minimum, both of the following criteria must be satisfactorily addressed: a—The use of the existing establishment and acceptable alternative uses have been actively marketed as such for a period of not less than 18 months. b—The floorspace has been widely marketed at a level of rent that covers the property owner’s costs in respect of the existing use, including a reasonable allowance for the risk of voids and any reasonable costs for bringing the unit into good condition.</p> <p><i>PIM1G does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.</i> <i>PIM1G does not contribute to the achievement of sustainable development.</i></p>	<p>b—The floorspace has been widely marketed at a level of rent that covers the property owner’s costs in respect of the existing use, including a reasonable allowance for the risk of voids and any reasonable costs for bringing the unit into good condition. <u>The marketing has been at a realistic rent that reflects a property owner’s reasonable costs, even if that is lower than previous rents.</u></p>
<p>Paragraph 32</p>	<p>As set out in the council’s Regulation 16 response, Paragraph 32 is not in accordance with City Plan Strategic Policy 1 which supports mixed-use areas and neighbourhoods. Paragraph 32 could be interpreted as a ban of all uses except residential in many areas of Pimlico not covered by any town centre designation, even if Pimlico is within the CAZ – Paragraph 32 is therefore also not in accordance with economic policies in the City Plan including City Plan Policies 13, 14, 15 and 16. Paragraph 32 should be amended and be more positively worded whilst acknowledging that CAZ areas outside of the town centre hierarchy are predominantly residential and that any proposed commercial use would need to demonstrate</p>	<p>The PNF proposes new wording that clarifies where the areas of commercial/mixed use character are and those areas that are of a residential character (as provided for in City Plan Policy 14 G and London Plan SD4K and SD5C2). The proposed WCC change “many streets” would really just confuse matters.</p> <p>PNF proposed change to Paragraph 32: <u>32. The commercial areas in Pimlico are the retail cluster, local centres and Pimlico Parades. Outside these commercial areas the use is principally residential and they are also residential in character.</u> The residential properties themselves are subject in City Plan policy to high levels of protection for continued residential use. So by definition any new non-</p>

	<p>it would not result in harm to residential amenity or the overall residential character of an area.</p> <p>WCC proposed change for Paragraph 32: <u>'Outside of the town centre hierarchy many streets are predominantly residential in character.</u> The residential properties themselves are subject in City Plan policy to high levels of protection for continued residential use. So by definition new non-residential development will likely be close to or even within <u>a an historic residential building.</u> To protect the amenity of this mainly residential area, non-residential uses should therefore be limited to the CAZ retail cluster, the local centres and the Pimlico Parades and caution is required for non residential use outside these areas: any use must respect the quiet residential character of these areas. <u>Non-residential uses, including hotels, should be directed to the town centre hierarchy. Outside of the designated town centres, where non-residential uses are proposed, proposals must demonstrate that they will be of a scale so as not to result in harm to the overall residential character of the area and would protect the amenity of the area.</u></p> <p><i>Paragraph 32 does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.</i> <i>Paragraph 32 does not contribute to the achievement of sustainable development.</i> <i>Paragraph 32 should be redrafted to be positively worded and unambiguous, in line with Paragraph 16 of the NPPF.</i></p>	<p>residential proposals will likely be close to or even within an historic residential building. To protect the amenity of this mainly residential area, non-residential use is directed to the CAZ retail cluster, the local centres and the Pimlico Parades and caution is required for non residential use outside these areas: any use must respect the quiet residential character of these areas.”</p>
Chapter 3		
PIM2	<p>As set out in the council's Reg 16 response, to be better in accordance with City Plan Policy 39 we suggest the word 'preserve' instead of 'respect' is used within PIM 2.</p>	<p>We agree to swap “respect” for “preserve”. We think that the idea of open skies is clear: they are discussed in para 11, illustrated in pictures on pp 26 and 27 and are a reasonable description of Pimlico when compared</p>

	<p>However, it is still unclear how the ‘openness of the skies’ will be assessed and so we believe this reference should be deleted from the policy, though where it is referenced in paragraph 11, this could be retained and support policy application and context in considering scale. It is unclear how the decision-maker will assess if an application has had regard or not to “the openness of the skies”.</p> <p>The identified views cover almost all the Neighbourhood Area and it is considered that it is excessive. By being all encompassing, PIM2 is vague and would benefit from identifying more specific views and what it is about them that is special and worthy of protection, such as key focal points, roofscapes and uniformity in façade design.</p> <p>We suggest the views are not listed as already shown on a map. The classification of views is also a bit unclear.</p> <p>WCC proposed changes to PIM 2: Development proposals are expected to respect <u>preserve or and where possible</u> enhance the townscape and views listed below and shown on the policies map 5. In particular, they must 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 looking along the street.</p> <p><i>PIM2 does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.</i> <i>PIM2 does not contribute to the achievement of sustainable development.</i></p>	<p>with the canyon of Victoria Street and the streets behind Westminster Cathedral. Attempting to define it very precisely would fail, as it would with most other aspects of acceptable planning policy where the judgement of the decision maker is required (e.g. impact on residential amenity). However, it would be helpful to bring this point out in PIM 2 as we propose in the minor amendment below.</p> <p>No change is proposed to the scope of this policy which grew out of discussion with Historic England who helped us identify what is special about PCA/historic Pimlico, the low level, the regularity, the sheer scale of that phenomenon within the Pimlico Grid. Identifying specific focal points would obscure the point about the scale and uniformity.</p> <p>PNF proposed changes to PIM 2: Development proposals are expected to respect <u>preserve or and where possible</u> enhance the townscape and views listed below and shown on the policies map. In particular they must have regard to the openness of the skies <u>(in particular the avoidance of a canyon effect of building heights on both sides of a street)</u>, the consistent scale of building heights and the regularity of the roofline when seen from street level looking along the street.</p>
<p>PIM3 B</p>	<p>As set out in the council’s Regulation 16 response, PIM3 B approach is too prescriptive and not in accordance with City Plan strategic Policies 39 and 40 which consider specific townscape context and are focused on maintaining a degree of uniformity within the roofscape</p>	<p>The PNF disagrees with WCC on PIM3 B which we want to be retained.</p> <p>The past policy approach that permits mansards in some places in Pimlico while not enabling them in other places that</p>

	<p>where it exists, which is especially important to roofscape character in areas such as Pimlico.</p> <p>Whilst we largely support PIM3 A which seeks to ensure good design for upwards extensions (with guidance on mansards in particular), PIM3 B is contrary to <u>Westminster's City Plan Policy 40</u> which seeks to maintain a degree of roofline uniformity. This non-conformity is acknowledged within the <u>PNF's Basic Conditions Statement</u> (Table 4.1, p. 14). As discussed below, we do not believe there is sufficient evidence nor justification to deviate from City Plan policy.</p> <p>PIM3 B is unclear without sufficiently clear justification to explain and aid understanding of the policy and its aims which are unclear to the reader and decision-maker. PIM3 B is not evidence-based.</p> <p>We also have concern that the policy might result in undesirable extensions; for example, in some contexts extensions to historic corner buildings may not be successful. It is also unclear why some 4 storey buildings are considered appropriate for roof extensions, but other 4 storey buildings are not.</p> <p>We suggest PIM3 B is redrafted and criteria are replaced by a simpler policy more focused on protecting/maintaining consistency in the roofscape to enable a case-by-case approach to allow response and consideration of context, but which still recognises one additional roof storey will generally be appropriate subject to design/heritage considerations and where there is no existing mansard or roof extension. This would bring policy PIM3 in accordance with <u>City Plan strategic Policies 39 and 40</u>.</p> <p>Moreover, It is noted that PIM 3 B encompasses many Grade II listed terraces. We are also concerned that PIM 3 B does not have sufficient regard to the need to consider heritage impacts upon listed buildings, such as historic</p>	<p>are suitable has been one of the most concerning issues in our area.</p> <p>The Conservation Area Audit (CAA) for the Pimlico Conservation Area (PCA) provides a house-by-house map showing where upward extensions are unlikely to be acceptable (Figure 33 in the CAA). However, in practice, planning decisions have not reflected the guidance provided by this map. In particular, there are a number of cases where mansards have been permitted where the CAA map has stated that they are unlikely to be acceptable. This then sometimes means that adjacent houses may become acceptable locations for mansards, even though the CAA map suggests that they also aren't likely to be acceptable, based on the locations shown on the map.</p> <p>Policy 40E in the new City Plan seems to imply that mansards may be gradually added next to existing mansards, but that whole 'virgin terraces' need to apply for planning permission in one go (reference is made in Policy 40E to 'taking a coordinated approach' where there is 'an existing roof line unimpaired by roof extensions'). The Forum takes the view that the focus on location has resulted in unintended outcomes and uncertainty, except perhaps for 'virgin terraces'.</p> <p>In order to address this situation, the approach in this plan is that any historic building could have a single mansard, except for 'exceptional terraces' N/S in the Pimlico Grid. These are short terraces, built initially one storey higher than the rest of the street, where addition of a mansard would result in overly tall buildings for the street. In practice, this restriction is mainly limited to the terrace on the W side of the N end of Cumberland Street and a post-war terrace in Winchester Street.</p> <p>That is the basis of the policy to set norms for maximum numbers of storeys. Any possible damage to rooflines is mitigated by ensuring that the design of the mansard is</p>
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roof forms. The current wording implies permission would be granted for additional storeys to listed buildings, without acknowledgement of the statutory requirement to have regard to the special interest of listed buildings. This is not in accordance with statutory duties in regards of listed buildings and does not meet the Basic Conditions.

In this SoCG, the PNF has referred to a recent allowed appeal decision for a 'single-tooth' mansard extension and deviation in previous planning decisions from the Pimlico Conservation Area Audit guidance; we would note that these examples pre-date the recently adopted **City Plan 2019-2040** (and its **strategic Policies 39 and 40** on roof extensions), which now set out the council's approach to roof extensions and uniformity to be followed in Westminster.

We suggest PIM3 B in its current form is deleted. If to be retained, some elements could be incorporated within PIM3 A such as policy wording explaining that an extension will not be acceptable where this is already one.

WCC proposed change for PIM3 B (to be incorporated as PIM3 A e):

e - one single storey mansard extension may be acceptable, except where there is an existing mansard or other upward extension or where the extension would fail to conserve the special interest or character of a listed building.

PIM3B does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.

PIM3 B does not contribute to the achievement of sustainable development and is not evidence-based. PIM3 B should be redrafted to be clearly and positively written and unambiguous, so it is evident how a decision maker should react to development

appropriate, which a number of previous consents have not appropriately reflected. It is considered that this policy will support the effective application of City Plan Policy 40 E 1, particularly the difficult planning judgement regarding the location of development and whether it can "help unify the architectural character of the existing terrace". The history of decision-making in Pimlico confirms the need for this support.

The Plan also proposes that 'virgin terraces' should have the same policy as elsewhere in the PCA. These terraces are generally between 4 and 11 units long, for example, those in Belgrave Road and Sussex Street.

Whilst City Plan Policy 40 E 2 would generally apply in these cases, it is considered impractical in Pimlico as it requires a single planning application for between 4 and 11 adjacent houses to be coordinated and delivered. In practice, this means getting agreement across all owners and lenders and has, understandably, proved impossible. For example, despite best efforts in Hugh Street (see the history of planning application P18/03060), consent was given subject to coordinating delivery but this has now been withdrawn). We do not believe this 'coordinated approach' is realistic in our area and would have the effect of ruling out the main possible means of providing extra housing space. Allowing individual permissions, as we propose, would be likely to result in whole terraces being 'mansarded' with appropriate development over time. In our view, the bigger issue than individual locations is that the design should be unobtrusive. The Planning Inspector discussion (APP/X5990/D/20/3247628) which allowed an appeal against refusal of a mansard in Sussex Street helpfully set out the townscape, character and other issues when it permitted the construction of a "single tooth" mansard.

	<p><i>proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
<p>Non-Policy Guidance: PDG Roof Extension Principles</p>	<p>As set out in the council’s Reg 16 response, it should be clarified what the role of the information in this table is and that it is not to be considered as planning policy. As guidance, it is for the decision-maker to assess what should be considered as a material consideration.</p> <p>It is also unclear if this guidance should be considered when proposing any type of roof extensions – this would be too onerous. If this guidance should be followed when providing mansards, this should be explicit. However, the Plan should be clear that to be in accordance with City Plan policies, design of any roof extension should be consistent with those in the wider terrace.</p> <p>We recommend guidance is moved to an Appendix, so it is clear that it is not be read as policy or supporting text.</p> <p><i>This table does not conform with strategic policies in the City Plan. It should be redrafted to be clearly and positively written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	<p>Disagree. The role of non-policy guidance is clear – it lists things to have regard to in planning decisions.</p>
<p>PIM4 B&C</p>	<p>As set out in the council’s Reg 16 response, PIM4B seems to relate to views of the open spaces between the rear elevations of terraces that are visible from street views. This could be supported by an illustration/photograph for clarity of the type of context to which this clause would relate. It appears a photograph on page 26 shows an example of the open aspect and return frontage to which Clause B might relate; however, PIM4 is on page 30 and so this connection is very difficult to deduce reading the policy. As drafted, Clause B does not contribute to sustainable development as could be preventing any type</p>	<p>No change needed to PIM4B & C.</p> <p>The label on page 26 pictures makes clear it refers the types of frontages referred to in B and C. We propose adding to the label on Page 26 “as in PIM 4 B”.</p> <p>The relevant part of PIM 4 C is a direct quote from para 4.15 of the Pimlico CAA (2006), so decision makers shouldn’t find this unclear or difficult to apply (or be unclear what feature it is trying to protect).</p>

	<p>of development (all development will have an impact on views).</p> <p>It is unclear what kind of feature PIM4 C is relating to or trying to protect. PIM4 C could be redrafted to explain which general features should be preserved and cross-reference the Conservation Area Audit in the reasoned justification.</p> <p>PIM4 B&C are unclear, ambiguous and could be difficult to apply by decision makers and should either be redrafted with further supporting text or deleted.</p> <p><i>PIM4 B & C should be redrafted to be clearly and positively written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
<p>PIM4 E</p>	<p>As set out in the council's Regulation 16 response, PIM4 E is contrary to <u>City Plan strategic Policy 40</u>.</p> <p>We understand that, in some instances, where shopfronts are non-original, of poor quality, or are isolated or 'end-of-frontage', peripheral properties within residential surroundings, proposing a design that would make the property appear like a typical residential frontage may be preferable, provided these instances would be 'isolated'. For example, a new residential frontage between two shopfronts may appear incongruous and has the potential to punctuate and disrupt active frontages.</p> <p>Our proposed wording below would allow for flexibility in the approach and would not necessarily preclude an alternative design, provided it can be demonstrated at application stage that such frontage conversion would not result in loss of historic shopfronts or shopfronts of merit, nor disrupt coherent active frontages.</p>	<p>The PNF disagrees with WCC proposed changes to PIM 4 E.</p> <p>The maximum number of retail units where an alternative residential design compared with a conversion retaining an historic shopfront might be permitted is very small: 4 in Westmoreland Terrace, 5 in Charwood Street W, 7 in Sussex Street, 3 in Hugh Street i.e. the Pimlico Parades. In addition we don't think the amended text is at all operationally clear as we can't see how planning officers can easily decide whether a design results in "disruption or punctuation of continuous coherent commercial frontage".</p> <p>Para 26 in the PNP explains why we have taken this approach and the two photos on Page 17 show the problems that can arise when historic shopfronts are retained and one on Page 16 shows where an attractive replacement at ground floor level has been allowed for a residential conversion of a shop.</p>

	<p>The submitted version of PIM4 E seems to encourage conversion and loss of shopfronts in any circumstance so long as residential is accepted from a land use perspective. This is contrary to PIM4 Clause D and City Plan strategic Policy 40 B. Our proposed wording adds clarity to when such alternative designs may be appropriate. The wording would allow for conversion, whilst providing the council flexibility to protect historic shopfronts and coherent townscape frontages, in accordance with City Plan strategic Policy 40 B.</p> <p>WCC proposed change for PIM4 E: E) Where the principle of conversion to residential use is acceptable, <u>and where no characteristic shopfronts and railings exist at ground floor level</u>, an alternative design for a residential frontage may be permitted at ground floor and basement level, provided it demonstrates a high-quality of design <u>and would not result in disruption or punctuation within a continuous coherent commercial frontage</u>.</p> <p><i>PIM4 E does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with strategic policies in the City Plan and the London Plan.</i> <i>PIM4 E should be redrafted to be clearly and positively written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
<p>PIM5</p>	<p>As explained in the council's Regulation 16 response, it is unclear when the last sentence of PIM5 would apply and is overly restrictive and not evidence-based. It also conflicts with PIM11 (as submitted). It could be read to prevent any increase in building height to sites both within and outside of the Peabody Avenue Conservation Area. It is unclear how the decision-maker will apply it. It is not promoting sustainable development. The last sentence should be deleted.</p>	<p>PNF agree to removal of last sentence of PIM 5, subject to PIM 11 policy including reference heights being retained.</p>

	<p><u>WCC proposed change for PIM5 (last sentence):</u> 'Development above the current height of the 1870's block or the modern (2011) development will be resisted'</p> <p><i>PIM5 does not meet the Basic Conditions as it is not in accordance with national policies and guidance. PIM5 does not contribute to the achievement of sustainable development. PIM5 should be redrafted to be clearly and positively written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
<p>PIM9</p>	<p>As explained in the council's Regulation 16 response, Neighbourhood Plans should not attempt to dictate the council, as a local planning authority, on operational issues and implementation of policies. Neighbourhood Plans should focus on land use matters.</p> <p>Moreover, PIM9 (as submitted) seems to set out a proposal to be followed when assessing planning applications across Westminster as the Non-Policy Guidance in page 36 is the one explaining how it should work in Pimlico.</p> <p>Although the PNF have proposed some revised wording and removed references to Panels, PIM9 is still very ambiguous and continues to deal with implementation issues.</p> <p>The council objects to PIM 9, the Non-policy guidance : Design Review Panel Pimlico and all reasoned justification paragraphs. Policies, guidance and reasoned justification should be deleted as they do not deal with land use matters.</p> <p><u>Further justification</u></p>	<p>We propose revising the title and the policy and confirm that this policy applies to applications in the Forum area only. The Council suggested that the Forum might undertake design review, but that is not practical as design review needs to take place at pre-application stage and the results of the review need to be published at the time of planning application at the latest. The lack of transparency to residents of the Council's assessment of design matters is a concern as design issues are often given only a brief mention in officers' report to Planning Committees. We do not require review always to be external, although independence within the Council is desirable. The main concern is about making public the reports at the earliest possible stage in the planning process.</p> <p>PNF propose to change title to: <u>Independent Design Review Panel</u></p> <p>PNF proposed change to PIM9: In order to ensure good design, the use of a Design Review Panel when determining planning applications by the local planning authority is strongly encouraged. <u>The use of an Independent Design Review (following best practice guidance in the London Quality Review Charter) for all major</u></p>

	<p>The NPF makes reference (see comments below for Paragraph 51) to London Plan policies. It is acknowledged that London Plan (2021) policy D4 recognises that Design Review Panels (DRP's) can be a useful tool for independent scrutiny of proposals from a design perspective, however it does not say they are necessary.</p> <p>The council has a Design, Conservation and Sustainability Team which consists of heritage specialists, architects and urban designers. On every major pre-application or application, an officer from this Team is allocated to and works alongside the planning officer, providing expert advice on design at pre-application stage and then at all stages of the process. In many cases, the design officer liaises with and works closely alongside Historic England.</p> <p>The design officer will attend all relevant meetings held on emerging proposals and provide design and conservation input into pre-application responses to applicants. To ensure both challenge and consistency in decision making, the council also holds a number of internal design review meetings where all design specialists review schemes together. We also hold wider review meetings involving a range of officers from across the council including highways, policy officers and public realm specialists to ensure wider policy considerations are fully taken into account within the design. All major schemes are considered at these meetings. Key comments and recommendations are reported within committee reports and a design officer is always present at Committee to provide elected members advice on the design implication of proposals</p> <p>The council has previously investigated the use of design review panels but the setting up and running of a separate panel is a resource intensive exercise and does not generally involve local communities. Given the existence of significant internal expertise with detailed local</p>	<p><u>developments in the Pimlico Neighbourhood Area is encouraged.</u> Development proposals are encouraged to demonstrate <u>at the time of submission</u>, how they have followed the advice of any such Panel and should provide clear reasons for any departure from the advice given <u>review</u>.</p>
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knowledge, the council has so far ruled out using an additional panel and it is not considered to be the most effective use of resources. **London Plan Policy D4** supports the use of internal staff in design review. External design review panels such as the Design Council are, however, in many cases already used and paid for by applicants for proposals as part of design development and in addition to specialist officer advice and our own design review. The council's approach to design review is fully in accordance with **London Plan Policy D4**.

In some occasions, the PNF have referred to the Design Review Panels of other local planning authorities and its importance at the pre-application stage to give the local community the ability to influence proposals before a formal planning application is submitted. We would note that at this early stage, panels are discretionary, paid for by the applicant and that the findings of the panel can be kept confidential at pre-application stage by developers.

The **NPPG on Neighbourhood Planning (Paragraph 004)** is clear that the statutory role of Neighbourhood Plans is to provide policies relating to the use and development of land and supporting wider strategic policy objectives within a Neighbourhood Area which will be used to determine planning applications. It is therefore inappropriate for planning policies in this Plan to require the council as local planning authority to change planning processes or procedures. Therefore, we consider that PIM9 should be deleted as it does not meet the Basic Conditions. Moreover, decision making processes (including design review) should be consistent across the city and therefore across Neighbourhood Areas and any policy on design review could undermine this consistency in decision-making process across the local authority area.

While we do not feel that a Westminster-wide design review panel would add value to the process, we would have no objections to the Pimlico Neighbourhood Forum

	<p>setting up and resourcing its own design review panel to comment on design within the Pimlico Neighbourhood Area.</p> <p><i>PIM9 does not meet the Basic Conditions as it is not in accordance with national policies and guidance, including the NPPG on Neighbourhood Planning (Paragraph 004).</i></p>	
<p>Paragraphs 44, 45, 46, 47, 48, 49 and 50</p>	<p>As explained in the council's Regulation 16 response and this SoCG, we believe Policy PIM9 should be deleted and all related reasoned justification and non-policy guidance.</p> <p><i>PIM9 and associated paragraphs do not meet the Basic Conditions as it is not in accordance with national policies and guidance, including the NPPG on Neighbourhood Planning (Paragraph 004).</i></p>	<p>PNF wishes to retain these paragraphs as they are part of the justification of PIM 9</p>
<p>Paragraph 51</p>	<p>As explained in the council's Regulation 16 response and this SoCG, we believe Policy PIM9 should be deleted and all related reasoned justification and non-policy guidance.</p> <p><i>PIM9 and associated paragraphs do not meet the Basic Conditions as it is not in accordance with national policies and guidance, including the NPPG on Neighbourhood Planning (Paragraph 004).</i></p>	<p>PNF proposed changes to Paragraph 51: Given the history of unattractive and jarring developments, and the concern about the future effect of development on the village feel, decisions should be taken with the benefit of an independent design review to provide an informed challenge. The Forum recommends that, before determining a planning application for major development or medium development in a sensitive location, Westminster City Council consults a Design Review Panel which would be appointed on a standing basis. <u>The London Plan Policy D 4 D requires the use of some form of design /quality review. High Quality reviews are defined as being: delivered in a manner that accords with the Design Council CABE / Landscape Institute / RTPI / RIBA guide, which calls for reviews to be independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, advisory, objective and available. Crucially the reports of the review should be made publicly available as soon as possible and in particular before public consultation on a planning application and ideally before. Reviews should ideally be carried out by a body/group other than the Council.</u></p>

<p>Non policy guidance</p>	<p>As explained in the council's Regulation 16 response and this SoCG, we believe Policy PIM9 should be deleted and all related reasoned justification and non-policy guidance.</p> <p><i>PIM9 and associated paragraphs and guidance do not meet the Basic Conditions as it is not in accordance with national policies and guidance, including the NPPG on Neighbourhood Planning (Paragraph 004).</i></p>	<p>PNF proposed new title: <u>“Design Review Panel Quality Review: from the London Quality Review Charter”</u></p> <p>PNF proposed change to Non-policy guidance text: Pimlico Neighbourhood Forum will, in liaison with Westminster City Council, establish a Design Review Panel for Pimlico (DRP).</p> <ul style="list-style-type: none"> • The DRP will be a panel of 12 architects appointed with the agreement of the Neighbourhood Forum. • The Forum may refer major planning applications to the DRP. • The Forum will appoint 3 architects from the DRP to report on an application. • Their remit will involve: — a site visit — examination of plans — discussion — a written report. • The DRP report will be sent to the Pimlico Neighbourhood Forum and Westminster City Council. • The Forum envisages WCC giving due weight to this report given its expert basis. • The Forum encourages WCC to work with applicants to address any concerns arising from the report. • The Forum envisages 1 application/site per year as smaller scale developments should be dealt with by other policies in this Neighbourhood Plan. • The Forum will ask WCC to pay the DRP's fees. <p><u>Quality review can support the development of scheme proposals, lead to the adjustment and refinement of schemes so that they are better able to create and maintain high quality places, and add value for the investment proposed. Quality review can also support the rejection of poorly designed and inappropriate schemes, which could damage the quality and character of a neighbourhood and the way in which it functions.</u></p>
<p>PIM11, Paragraphs 52 and 53 (and new paragraphs 54 and 55) and Appendix 1</p>	<p>As explained in the council's Reg 16 response, PIM11 C (as submitted) sets out reference heights for different locations that should be used when assessing planning applications for new tall buildings in Pimlico in accordance with PIM11 A. As set out in the council's Reg 16 response, the reference to 'Tall Buildings' and inclusion</p>	<p>This policy was developed in discussion with Historic England and we feel it is well evidence based and improved since the Reg 14 Plan – see the additional maps in the appendix 1 added for Reg 15/Reg16 Plan. The heights in the 2 maps (Maps 9 and 10) and the illustrative view of the Forum Area are based on average heights of buildings using</p>

of the stipulated reference heights are not in conformity with the **City Plan and London Plan** definitions, adopting PIM11 (as submitted) could result in confusion for decision-makers. As a result the policy is not needed and decision-makers can rely on City Plan and London Plan policy to determine appropriate building heights.

Reference heights and evidence in Appendix 1

Out of six 'reference heights', five are below 18 metres (**London Plan Policy D9** sets out that the height of a tall building will not be less than 18 metres). To be supported, the Forum would need strong evidence to justify the 20m limit. Appendix 1 and the RJ are not considered to be sufficient evidence whilst it is noted there are inaccuracies in the visualisations used with existing larger buildings omitted (e.g.the top end of Wilton Road where there are buildings greater than 11m have been omitted). Moreover, Map 9 does not have dates (it is Pimlico in 2021?) and it is unclear what Map 10 and the illustrative view are showing. Moreover, **City Plan strategic Policy 41** defines tall buildings as "buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline". As drafted, the role of the "reference heights" is unclear and can cause confusion to the applicant and decision-maker. In this SoCG, the Forum suggests to amend PIM11 and remove the reference to 'Tall Buildings' to address the confusion and contradiction between the definitions of 'Tall Buildings' in both the **London Plan and the City Plan**. Although we welcome reference heights are removed from the policy, the Forum still wishes to keep them in the reasoned justification. We object to the reference heights being included in either the policy wording or reasoned justification as they are not evidence-based.

The inclusion of these reference heights would have the effect of considerably restricting the scope for any new buildings or extensions above the heights of historic

OS data as at Feb 2020. We have made clear that we are dealing with a different issue than the London Plan 18m tall building definition – we are addressing 'tall' within the Pimlico context. The reference heights that have been used take the Map 9 and Map 10 analysis as a starting point.

PNF proposed change for PIM11:

A. Pimlico is generally not an area suitable for ~~tall~~ buildings out of scale with their neighbours and surrounding area within the Pimlico Neighbourhood area. Any proposal ~~over the reference height~~ must preserve protected townscape and views, the setting of any listed building or unlisted building of merit or and the setting and key features of any conservation areas.

B. ~~Any part of the structure higher than the reference height should aim to be subordinate to the main lower part of the building. The highest point of any building should be principally no higher than the reference height of the area. Any part of the building that is above the reference height must:~~

- a. clearly be subordinate to the building below; and
- b. respect the scale of the building below the reference height; and
- c. respect design policies PIM 3 – PIM 10 as applicable.

~~C. The following reference heights above street level shall apply:~~

- ~~– Peabody Avenue and Pimlico Conservation Areas (except for Eccleston Square, Warwick Square, St George's Square, Belgrave Road and St George's Drive): 11m~~
- ~~– Eccleston Square, Warwick Square, St George's Square, Belgrave Road and St George's Drive: 17m~~
- ~~– Lillington and Longmoore Gardens Conservation area: 14m~~
- ~~– Abbots Manor Estate: 17m~~
- ~~– East corner between Lillington and PCA: 17m~~

terraces within the Pimlico Neighbourhood Area. This approach does not contribute to achieving sustainable development and therefore does not meet the Basic Conditions.

The proposed policy does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with strategic policies in the City Plan. PIM11 and its associated reasoned justification are overly restrictive and do not contribute to sustainable development, in line with the NPPF.

~~–All other locations: 20m.~~

The Forum considers that it is important, for the effective application of the policy, that the reference heights are listed in the reasoned justification. The Forum subsequently proposes to amend paragraphs 52 and 53, and proposes two new paragraphs 54 and 55.

PNF proposed changes for paragraphs 52, 53 and new paragraphs 54 and 55:

~~52. Pimlico is a consistently low scale with individual streets, squares and estates exhibiting a high degree of regularity of their rooflines. The buildings in the Conservation Areas, with the exception of Dolphin Square, are generally no more than 6 storeys (equating to 20m or 7 modern storeys) above ground level and the prevailing height outside the squares and the avenues is 3 storeys plus a mansard and modern buildings of 9 and 11 storeys have had a detrimental effect on our area. The City Plan makes clear that the Forum Area is not suitable for tall buildings, but defines a tall building as one more than 50% higher than the surrounding buildings. Pimlico is a consistently low scale when compared with its neighbouring areas, Victoria being the most striking case. The townscape of individual streets, squares and estates exhibit a high degree of regularity of their rooflines. The London Plan defines a tall building as one higher than 18m and the City Plan as at least twice the prevailing context height. PIM 11 reflects the Pimlico context and therefore deals with applications that may be smaller than these definitions of tall buildings. It should be noted that the policy applies 'reference heights' which are different to the 'context heights' applied to tall buildings in the City Plan. Reference height refers to the maximum characteristic height above street level of the townscape.~~

~~53. As demonstrated in Appendix 1 Pimlico shows a remarkable consistency of heights in the terraces and squares (including those in Peabody Avenue) and to a~~

~~slightly lesser extent in Lillington and Longmoore Conservation Area. So this plan needs to reflect that consistency. To some extent this is dealt with in other policies, but for clarity, this policy reflects the prevailing heights shown on the maps.~~ As demonstrated in the visuals in Appendix 1, Pimlico shows a remarkable consistency and regularity of reference heights in the terraces and squares (including those in Peabody Avenue) and to a slightly lesser extent in Lillington and Longmoore Conservation Area. In many locations a building below the height of a “tall building” (based on the City Plan or the London Plan definition) would risk being seriously out of scale and destroy the regularity (as is shown by the two pictures on page [34]. In order to preserve the townscape, development in Pimlico should reflect that regularity. This policy establishes an appropriate set of building heights across Pimlico, explicitly reflecting the heights shown on the maps.

54. In the Pimlico Conservation Area, the reference height outside the squares and the avenues is 3 storeys plus a mansard (about 11m) and below 17m in the rest of the Conservation Areas with the exception of Dolphin Square, which is approximately 20m (and therefore new buildings at this height would meet the London Plan definition of tall).

55. The following reference heights are based on the maps in Appendix 1. The areas specified have their own specific characteristic heights and the policy reflects this e.g. the Squares and the main N/S avenues are distinct from the other parts of the Pimlico Conservation Area:

- Peabody Avenue and Pimlico Conservation Areas (except for Eccleston Square, Warwick Square, St George’s Square, Belgrave Road and St George’s Drive) including area south of Peabody Avenue CA and north of Grosvenor Road: 11m
- Eccleston Square, Warwick Square, St George’s Square, Belgrave Road and St George’s Drive: 17m

		<ul style="list-style-type: none"> • Lillington and Longmoore Gardens Conservation area: 14m • Abbots Manor Estate: 17m • East corner of Pimlico Neighbourhood Forum Area bounded by Lillington and PCA: 17m • All other locations: 20m
Chapter 4		
PIM13 B	<p>As explained in the council's Regulation 16 response, <u>City Plan strategic Policy 8A</u> states that Westminster will increase the number of new homes within the city by permitting appropriate upward extensions, when such extensions comply with wider design policies. PIM13 B is contrary to <u>City Plan strategic Policy 8 A</u> as it precludes the provision of new homes through upwards extensions. The <u>City Plan and the London Plan</u> have recently gone through independent Examination and contain strategic housing policies based on robust and scrutinised housing need evidence (a number of evidence papers can be found in the council's Examination library). Evidence shows that there is a need for housing of all sizes across Westminster.</p> <p><u>Evidence</u></p> <p>The Forum have recently provided the council with a paper called '<i>Moving Up and Down the Housing Ladder</i>', that supports the case for PIM13 B. Whilst the data in this paper shows some minor pattern of supposed decline in younger age groups, the paper is only based on 2011 Census data and so no comparable pattern across time can be deduced to robustly say whether this reflects a pattern of families leaving Pimlico over time. This paper is not considered to be robust evidence sufficient to support the proposed policy approach that departs from the council's strategic approach to housing. PIM13 B is not in accordance with <u>City Plan strategic Policies 8 and 40</u></p>	<p>Our analysis in the Housing Technical Note is consistent with Technical Analysis evidence presented in relation to the City Plan analysis. We have used Census 2011 data, as this is the data that the Council asked us to use. When we requested demographic data for our area in 2017 officers said "I'm afraid we don't have the capacity within the Council to undertake detailed research or extract data for you,The baseline Neighbourhood statistics datasets [which we have used] are broken down into neighbourhood area – so hopefully that should provide you with a lot of what you need." The issues identified (moves from 1 to 2-bedroom units and moves from family houses and larger flats to level/duplex units) were there in 2011 and discussions with estate agents confirm the supply situation has not changed. The Technical Analysis on housing need in the Examination Library doesn't materially address these issues of sizes and types of housing stock in the market sector.</p>

	<p>and wider City Plan and London Plan policies that support housing delivery and sustainable development in the city.</p> <p><i>PIM13 B does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with strategic policies in the City Plan and the London Plan.</i></p> <p><i>PIM13 B does not contribute to sustainable development, in line with the NPPF.</i></p>	
<p>Paragraph 9</p>	<p>As explained in the council's Reg 16 and above in relation to Policy PIM13 B, the policy approach set out in Paragraph 9 is not in accordance with City Plan Policies 8 and 40 and is not evidence based. Paragraph 9 should therefore be deleted.</p> <p>If to be retained, any evidence papers that show that Pimlico has a shortage of family housing should be referenced although as aforementioned for PIM13 B, we do not consider the Housing Evidence Note 'Moving Up and Down the Housing Ladder' (document EXPNF001) sufficient to deviate from strategic City Plan policies.</p> <p>The third sentence and fourth sentences are worded ambiguously. The paragraph could recognise that upwards extension could be combined with an existing unit to enable creation of new family sized homes, but equally it should not preclude new dwellings. It also remains unclear what the words between brackets in the last sentence mean and how this policy is allowing families to downsize.</p> <p>We believe that along with PIM 13 B, the paragraph should be deleted as it is unclear, whilst it reads as preventing new dwellings being created through upwards extensions.</p> <p><i>Paragraph 9 does not meet the Basic Conditions as it is not in accordance with national policies and guidance, it is not clearly written and is not in</i></p>	<p>Housing evidence note already provided (see submitted document EXPNF001). We do not believe it is inconsistent with the council's own analysis.</p> <p>Third sentence is not contradictory. We are increasing the number of those historic houses (in the sense of individual buildings) where an upward extension is allowed. Where this produces a larger flat at the top storeys, this will increase the number of 3- or 4-bedroom flats.</p> <p><u>PNF proposed changes to Paragraph 9 (last sentence):</u> The lack of family sized units to (and properties attractive enough to downsize to from <u>by existing owners of</u> family units) supports this policy.</p>

	<p><i>conformity with strategic policies in the City Plan and the London Plan.</i></p>	
<p>PIM14 title and B, Paragraph 11</p>	<p>WCC proposed title: “New-build housing sizes and types in Pimlico”</p> <p>As set out in the council’s Regulation 16 response, we welcome the Forum’s encouragement for older people accommodation and for new homes in Pimlico to be accessible. However, PIM14 B as submitted is unclear and not evidence based. The proposed WCC wording will ensure that new homes in Pimlico meet the needs of the less mobile.</p> <p>We do not understand why the PNF now proposes PIM14 applies to conversions, as these are dealt with by PIM13. PIM14 should be about new-build housing. In relation to the new wording proposed by the PNF in this SoCG, we believe it is unreasonable to only ask larger flats to take into account the needs of older people as older people tend to downsize.</p> <p>WCC proposed change for PIM14 B: B. In order to specifically address the needs of <u>New homes should be accessible and adaptable or adapted for wheelchair users.</u> older and less mobile people 2- and 3-bedroom units should be delivered on single level, ideally with lift access. The provision of older persons market housing is encouraged</p> <p><i>PIM13 B does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with the City Plan and the London Plan. PIM14 B does not contribute to sustainable development, in line with the NPPF, being overly restrictive.</i></p>	<p>PNF proposed change for PIM14 B: B. In order to specifically address the needs of older and less mobile people 2- and 3-bedroom units should be delivered on single level, ideally with lift access. The provision of older persons market housing is <u>are encouraged to meet the needs of older people.</u></p>

PIM15

As explained in the council's Regulation 16 response, Westminster has a high level of housing need and the allocation of affordable housing, where provided, falls outside of planning policy and so it is not possible to require intermediate housing specifically for key workers through a neighbourhood plan. Furthermore, **City Plan strategic Policy 9 G** sets out that the mix and size of affordable housing will be determined by identified need within the council's Annual Affordable Housing Statement, which may include other unit sizes, not just family sized housing, depending on local and identified need which may vary across time, responding to need. As submitted, PIM15 conflicts with **City Plan strategic Policies 8, 9 and 10** which set out the council's approach to maximising affordable housing delivery in response to identified needs. If PIM15 is to be retained, we suggest the policy is amended to be unambiguous (it now talks about different issues as family size housing and intermediate housing in the same policy) and in accordance with the **City Plan**.

WCC proposed change for PIM15:

The provision of ~~family-sized~~ affordable residential units (including intermediate homes) that help meet local need is encouraged, particularly where these units are offered to people already living in the area. In particular, provision is encouraged which prioritises intermediate housing for key workers who need to be located in, or close to, the area or for whom there is a clear professional benefit is encouraged'

PIM15 does not meet the Basic Conditions as it is not in conformity with strategic policies in the London Plan and City Plan.

PIM15 should be amended to be clearly and positively written and unambiguous, so it is evident how a

The PNF wishes to retain PIM15 as submitted. The policy is justified in the supporting text in the Plan. We wish to reiterate that the policy 'encourages' such provision, rather than 'requiring' it as WCC is stating.

	<p><i>decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
<p>Paragraph 15</p>	<p>As explained above for PIM15, planning policy cannot control allocation of housing and Westminster (and therefore Pimlico) have a need for all types of housing. It is for the council, as housing authority rather than planning authority, to decide how homes are allocated. The council has already identified high-level groups of key workers and has a set list of established priorities that it follows when allocating affordable homes and this cannot be influenced by a Neighbourhood Plan.</p> <p>As explained above, PIM15 should be deleted and so should be Paragraph 15 as it is causing confusion. If PIM15 and Paragraph 15 are to be retained, we suggest all references to allocation of homes and key workers are removed. Alternatively, the paragraph could recognise that affordable housing has potential to meet housing need, which can include key workers.</p> <p><u>WCC proposed replacement for Paragraph 15</u> <u>Provision of affordable housing, including intermediate housing, can support key workers essential to the delivery of services to be able to live within the Neighbourhood Area. For this reason, provision of new affordable housing, including intermediate housing, will be supported.</u></p> <p><i>Paragraph 15 does not meet the Basic Conditions as it is not in conformity with strategic policies in the City Plan.</i></p>	<p>Disagree. Key workers are an important and valued part of our economy and community.</p>
<p>Paragraph 16</p>	<p>City Plan Policy 9 requires social housing to be delivered as part of housing development and this is important to achieve balanced communities, as per the NPPF.</p>	<p>The priority in PIM15 reflects the higher proportions of social tenants in Pimlico compared with Westminster as a whole.</p>

	<p>The City Plan is based on robust housing evidence which demonstrates acute need for both social and intermediate housing. We suggest paragraph 16 is redrafted to be evidence-based, more positively worded (as drafted, it could be read as if social housing did not contribute positively to Pimlico) and that the last sentence is deleted (as new housing proposals should be assessed on its own merits and housing provision based on identified housing need, rather than taking as a basis the existing context). Paragraph 16 should explain that development will need to follow the tenure split set out in the City Plan.</p> <p><i>Paragraph 16 does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with strategic policies in the City Plan and the London Plan.</i></p>	
<p>Paragraph 20</p>	<p>We believe that this paragraph reads slightly contradictory; PIM16 seems to discourage new hotels in residential areas but the paragraph implies they might be acceptable, notably smaller hotels. We suggest that the policy is amended to have a greater focus on where hotels should be directed and the issues that would need to be addressed for such uses outside of the town centre hierarchy.</p> <p>We partially accept some of the Forum's suggested wording in this SoCG.</p> <p>See also comments for Paragraph 32 in Chapter 2. As set out in the council's Regulation 16 response, this approach is not in accordance with City Plan Strategic Policy 1 and with economic policies in the City Plan including City Plan Policy 15.</p> <p>WCC proposed change for Paragraph 20:</p> <p>This means that there needs to be caution about introducing new hotels close to residential areas</p>	<p>PNF proposes revised para 20 to address this concern. We note that WCC's proposed addition to para 20 reads like policy wording.</p> <p>PNF proposed change for Paragraph 20:</p> <p>This means that there needs to be caution about introducing new hotels close to residential areas (conversion of residential buildings to hotels is unlikely to be proposed and is not appropriate <u>The particular concern for residential amenity is</u> Larger hotels should also be avoided where they are in or adjacent to residential areas as they would be likely to generate <u>the level of</u> traffic and disturbance from late-night arrivals <u>and servicing that hotels, particularly large hotels, create.</u> However, smaller hotels would be less problematic <u>New hotels are therefore directed to the Commercial Areas i.e. the Warwick Way/Tachbrook CAZ Retail Cluster, the Local Centres and the Pimlico Parades.</u></p>

	<p>(conversion of residential buildings to hotels is unlikely to be proposed and is not appropriate). <u>The particular concern for residential amenity is Larger hotels should also be avoided where they are in or adjacent to residential areas as they would be likely to generate the level of traffic and disturbance from late-night arrivals and servicing that hotels, particularly large hotels, create. However, smaller hotels would be less problematic New hotels should be directed to the town centre hierarchy. Outside of the designated town centres, where hotel uses are proposed within predominantly residential areas, proposals must demonstrate that they will be of a scale so as not to result in harm to the overall residential character of the area and would protect the residential amenity of the area.</u></p> <p><i>Paragraph 20 does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.</i></p> <p><i>Paragraph 20 does not contribute to the achievement of sustainable development.</i></p> <p><i>Paragraph 20 should be amended to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
Chapter 5		
<p>PIM17, Appendix 4 and submitted document EXWCC01</p>	<p>As explained in the council's Regulation 16 response, we disagree on the appropriateness of designating the areas outlined within PIM17 as 'Local Green Spaces' (LGS) and the applicability of Green Belt policy.</p> <p>As outlined within submitted document EXWC001, almost all of these spaces are already afforded protection by virtue of being Grade II Registered Historic Parks, and/or protected by the London Squares Preservation Act 1931, and/or by the Conservation Area designation, whilst they</p>	<p>No change proposed as the policy is explained and justified in the Plan. Open space and green space were identified as priorities early in the development of the Neighbourhood Plan and remains important to the local community: not everyone in this part of Westminster has access to their own back garden for parties or other forms of recreation. Consultation with owners has been carried out at Reg 14 and subsequently in respect of the private gardens for Eccleston Square and Warwick Square.</p>

are identified within **City Plan strategic Policy 32** as open space and therefore protected.

The **NPPG (paragraph 011)** cautions against designating areas as LGS when they are already protected from inappropriate development by other designations. Further designations are considered unnecessary. Furthermore, the reasoned justification notes that popup cafes may be acceptable in some instances; however, designation as LGS and applicability of green belt policies could impede such possibilities.

The PNF has noted that the Knightsbridge Neighbourhood Plan designated LGS, however during the Mayfair Neighbourhood Plan Examination, the Examiner agreed with the council that the designation was unnecessary.

The council also has concerns over the consultation undertaken. As noted within submitted document EXWC001, some landowners were only consulted following regulation 14 and 16 rounds of consultation so may have missed on the opportunity to comment on the Plan. Furthermore, the Consultation Statement (Paragraphs 31 & 32) does not clearly evidence that landowners have indeed been consulted.

As the designation is unnecessary, goes against some other policy aims in this Plan, is not evidence-based and there has been a potential lack of consultation with owners, we believe PIM17 should be deleted. If PIM17 is to be retained, it should refer to the importance of protecting the identified areas as 'open green spaces' and omit references to Green Belt policies as such policies do not apply in Westminster.

If PIM17 is amended, the plan's appendix should be amended accordingly (including title, supporting text and table).

	<p><i>The proposed policy does not meet the Basic Conditions as it is not in accordance with national policies and guidance.</i></p>	
<p>PIM23</p>	<p>As explained in the council's Reg 16 response, the aims of PIM23 are welcomed. However, PIM23 is overly complicated and deviates from the Mayor's Energy Hierarchy. PIM23 is contrary to <u>City Plan Policies 32 and 36</u>. PIM23 should be redrafted to be better in accordance with <u>London Plan Policy SI2</u>.</p> <p>Within Clause A, it is not clear what 'Zero Local Emissions' means (this has not been defined) whilst it is unclear to which types of development it would apply and how it would be demonstrated by developers. It is also contrary to the Mayor's Energy Hierarchy (<u>London Plan Policies SI 1&2</u>) which requires minor development only to seek to be energy efficient to reduce energy use, not necessarily demonstrate net-zero.</p> <p>Clause B strays into justification and is unclear to which buildings the policy would apply. We suggest alternative wording so that the clause is clearer, in greater accordance with <u>City Plan Policy 36</u> and enables the clause to apply to various forms of development.</p> <p>The first half of Clause C repeats the requirement to minimise energy use and maximise renewable energy from Clause B. It is unclear what "medium development and substantial refurbishment" are, meaning it cannot be effectively implemented. This should be defined in the RJ which should also recognise that many refurbishment works do not need planning permission.</p> <p>Clause D is technology-specific and may become redundant; the ambition is to ban domestic gas boilers within the lifetime of the Plan. Furthermore, it is unclear</p>	<p>No change proposed. We do not understand why this policy is supposed to be in conflict with the City Plan.</p> <p>PIM23 encourages developers to build on City Plan Policy 32 and go further in reducing the impact of development on air quality. Similarly, PIM23 seeks to provide guide developers, within the framework of the Mayor's Energy Hierarchy, to maximise renewable energy and minimise, where practicable, the use of fossil fuel energy sources.</p> <p><u>PNF proposes definition of zero local emissions in the glossary:</u> "Zero local emissions - Development that emits no emissions to air within the Pimlico Neighbourhood Area other than filtered air after ventilation or cooking. Where possible it should use only 100% renewable energy."</p>

when this clause would apply, whether on minor, major or all development. Clause E relates to back-up generators which should only be used in the event of emergencies and power-outages and so we would question the necessity of this clause as it could be arduous. Within Clause F, it is unclear which 'sustainability standards' are to be met, which would make it difficult to implement with consistency. We suggest Clauses D, E and F are moved to an Appendix or the reasoned justification as this cannot be controlled by the planning system.

WCC proposed change for PIM23:

A ~~All~~ Development proposals should not lead to further deterioration of existing ~~aim to achieve Zero Local Emissions and not lead to further deterioration of poor~~ air quality, and enhance it where possible.

B ~~To mitigate emissions that worsen climate change it is essential that buildings in the Pimlico Forum Area~~ Development proposals should minimise on-site energy use demand, and maximise energy efficiency and the ~~production and~~ use of low carbon energy sources ~~renewable energy to meet their needs.~~

C Major development ~~must minimise energy use and maximise the proportion of energy used from renewable sources, and medium development and substantial refurbishment of existing buildings is also encouraged to do so. Such development should consume significantly less non-renewable energy than the development it replaces. Such development~~ should:
– ~~demonstrate that it has taken all reasonable steps to minimise energy use and maximise energy efficiency;~~
– demonstrate that systems have been designed to operate at optimum efficiency ~~e.g. low return water temperatures;~~
– facilitate the reduced use of unregulated energy on site where technically feasible and commercially viable;

	<p>– maximise the proportion of renewable energy generated on site, consistent with local amenity, design and heritage policies in this plan;</p> <p>–facilitate the maximum use of renewable energy from off-site sources, for example by the provision of space for battery storage (that also takes fire risk into account);</p> <p>– be future-proofed where practical.</p> <p>D If renewable energy cannot reasonably be used, then gas boilers achieving the lowest dry NOx emissions (measured at 0% excess O2) should be selected.—</p> <p>E Where back-up generators are provided, alternatives to diesel generators should be considered to minimise impact on air quality.—</p> <p>F Development seeking to comply with sustainability standards is encouraged to maximise electricity usage over other forms of energy generation that can have adverse impacts on air quality.—</p> <p><i>PIM23 does not meet the Basic Conditions as it is not in accordance with national policies and guidance, and does not conform with strategic policies in the City Plan.</i></p> <p><i>PIM23 should be amended to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals in line with Paragraph 16 of the NPPF and the NPPG.</i></p>	
Chapter 6		
PIM24 D and Map 8	<p>We have concern with the current boundary of the ‘Queen Mother Sports Centre Block’ in the Plan as identified within Map 8 and described in the opening sentence of PIM24 D. It includes the Grade II listed terrace at 1-25 Gillingham Street and historical terrace buildings that fall within the Pimlico Conservation Area, including 2-22 Upper Tachbrook Street and 74-77 Wilton Road. Inadvertently, inclusion of these buildings could imply that PIM24 D would support the redevelopment of these buildings, or their potential amalgamation into a wider redevelopment project for the Sports Centre site. We believe the red</p>	<p>We think it is important to deal with the whole block (as bounded by the roads mentioned in PIM 24 D as amended), even though we do not support redevelopment of the listed terrace at 1-25 Gillingham Street or the terrace on Upper Tachbrook Street. This is made clear in the proposed amendments to PIM 24 D e. It is also crucial that sports and gym facilities should not be lost to other leisure uses, as might be implied by the council’s proposals for PIM 24 D b. We note that development might be proposed for only part of the block and that needs to be provided for in this policy without prejudicing redevelopment of the sports centre.</p>

boundary line of Map 8 should be revised to omit these buildings and the opening sentence re-worded accordingly.

PIM24 D a:

As explained in the council's Regulation 16 response, PIM24 Da strays into justification, it is unclear what the "central area" is and what is the difference between Pimlico and "other local residents". Whilst we welcome the support for main town centre uses in PIM24 Da as this aligns with **City Plan Policies 14, 15 and 16**, with the introduction of Class E it is more difficult to control commercial uses and provision of retail. It is also not possible to control the levels of future rents on the site. We would therefore suggest 'a' is redrafted to set out an expectation for main town centre uses with active frontages at ground floor level to be in accordance with **City Plan Policies and PIM1.**

WCC proposed change for PIM24D a:

a. ~~As a fundamental part of the central area Warwick Way/ Tachbrook Street CAZ Retail Cluster within of Pimlico,~~ proposals must ~~ensure that they will~~ enable the area to thrive as a destination that meets the leisure, shopping and dining needs of Pimlico's residents, workers, and visitors. ~~and other local residents.~~ Ground floor uses will ~~be expected to~~ consist of main town centre uses and contribute to the success of the Warwick Way/Tachbrook Street CAZ Retail Cluster. ~~Proposals should not make significant additional provision of retail floorspace, particularly where this competes with existing retail provision in the Warwick Way/Tachbrook Street/ CAZ Retail Cluster. Any loss of existing retail units should be re-provided at appropriate rents in order to address the needs of current occupiers.~~

PIM24 D b:

As explained in the council's Regulation 16 response, we welcome the recognition of the importance of the leisure

WCC's proposals to add "contribute to the success of" to PIM 24 Da are vague and unlikely to be easy to decide.

PIM24 D a:

PNF proposed change for PIM24 D and D a:

D. Any major redevelopment proposals for the Queen Mother Sports Centre block (bounded by Gillingham Street, Vauxhall Bridge Road, Upper Tachbrook Street, ~~and~~ Longmoore Street and Wilton Road) are expected to address the following matters, where the scale and location of proposals permit:

a. As a fundamental part of the central area of Pimlico, proposals must ensure that they will enable the area to thrive as a destination that meets the leisure, shopping and dining needs of Pimlico and other local residents. Ground floor uses will be expected to consist of main town centre uses. Proposals should not make significant additional provision of retail floorspace, particularly ~~where this competes large units which are likely to compete~~ with existing retail provision in the Warwick Way/Tachbrook Street/ CAZ Retail Cluster. Any loss of existing retail units should be re-provided at appropriate rents in order to address the needs of current occupiers.

PIM24 D b:

PNF proposed change for PIM24 D b:

b. The existing role of the centre as a sports facility with a swimming pool should be retained. Any redevelopment proposals must ensure that re-provision of the sports facility is of at least a comparable scale to the existing provision and its function continues to be as a facility serving local and Westminster needs. In the case of development of part of the block, this must not prevent the re-provision of the sports facility on the site.

PIM 24 D c and d:

facility; however, leisure facilities can incorporate many forms of community leisure uses, not just sports, whilst **City Plan strategic Policy 17** supports reconfiguration of community facilities where this results in upgraded or improved facilities meeting community needs, which could include further ancillary uses that support the main community use. Therefore, we recommend that PIM24 D b is redrafted to be in accordance with **City Plan strategic Policy 17**.

We note the PNF have suggested new wording for PIM24 D b which is very onerous and does not contribute to sustainable development.

WCC proposed wording for PIM24 D b:

b. The existing role of the Queen Mother Sports Centre centre as a sports community leisure facility with a swimming pool should be retained. Any redevelopment proposals must ensure that re-provision of the sports leisure facility is of at least a comparable similar scale to the existing provision, and its functions continues to be as a facility serving serve the local community and meet Westminster's needs.

PIM 24 D c and d:

As explained in the council's Regulation 16 response, we agree that development proposals should improve public realm and contribute positively to permeability, however part 'd' could prejudice a more appropriate design for the site and compromise its optimisation. We suggest this is redrafted to require proposals to seek to enhance permeability and public space provision within the site and in the vicinity. The two could also be merged.

WCC proposed wording for PIM24 D c and d:

c. Proposals Development should explore opportunities to increase complement and, as appropriate, contribute

PNF proposed change for PIM24 D c and d:

c. Proposals should complement and, as appropriate, contribute towards the improvements to the public realm in Wilton Road/Warwick Way identified in Policy.

d. ~~Development should create~~ maximise the opportunities to create permeability within the site, including where possible by the by provision of a ~~providing a~~ permanent public pedestrian route through from Wilton Road to Vauxhall Bridge Road or open up public spaces accessible from Wilton Road.

PIM 24 D e:

PNF proposed change for PIM24 D e:

e – Development should preserve (and enhance the setting of) the listed terrace in 1-25 Gillingham Street and the historic terrace of shops ~~on the west side at 2-22~~ of Upper Tachbrook Street and adjacent public realm. More generally, development must be of a scale that respects and enhances the townscape of Pimlico, paying particular attention to the importance of consistent building heights and respecting the setting and historic character of the Pimlico Conservation Area.

The PNF wishes to retain PIM24 D f and g as submitted.

~~towards the improvements to the public realm in Wilton Road/Warwick Way identified in Policy X.~~
~~d—Development should create~~ permeability within the site and the Warwick Way/Tachbrook Street CAZ Retail Cluster by considering the delivery of a ~~by providing a~~ permanent public pedestrian route through from Wilton Road to Vauxhall Bridge Road, the provision of accessible ~~or open up public spaces accessible from Wilton Road~~ and/or improvements to the public realm in accordance with PIM22.

PIM 24 D e:

As explained in the council's Reg 16 response, it is unclear to which buildings "e" applies to. We suggest this is redrafted to be clear.

We note the PNF have suggested new wording for PIM24 D e which is not needed as what development needs to take into account is already dealt with by policies in this Plan and the City Plan.

WCC proposed wording for PIM24 D e:

e.Development should preserve ~~(and enhance the setting of)~~ the listed terrace in 1-25 Gillingham Street, ~~and~~ the historic terrace ~~of shops on the west side of~~ in 2-22 Upper Tachbrook Street, ~~its~~ adjacent public realm and the historic buildings at 74-77 Wilton Road.

PIM 24 D f:

As explained in the council's Reg 16 response, although the support for small businesses is welcomed, the second part of 'e' that specifies design requirements to prevent future amalgamation is too onerous whilst future amalgamation may not be considered 'development'. **City Plan Policies 1 and 13** recognise the importance of intensification within the CAZ and provision of a range of employment floorspace including smaller and larger office

	<p>provision. As currently worded, 'e' is overly restrictive and contrary to <u>City Plan Policies 1 and 13.</u></p> <p><u>WCC proposed wording for PIM24 D f:</u> f- In addition <u>to provision of leisure and community floorspace</u>, provision <u>for uses that support new employment opportunities or that</u> to meet the needs of small and micro-businesses <u>will be supported.</u> strongly encouraged. The design would be expected to ensure that the subsequent amalgamation of units into a single larger unit is not possible.</p> <p><u>PIM 24 D g:</u> As explained in the council's Reg 16 response, it is unclear what "significant" means, making this clause as drafted ineffective. If this is intended as a ban on residential uses, this is not supported as it is contrary to <u>City Plan Policies 1 and 8</u> which support residential development as a high priority across the city. The site offers scope for mixed use development and to accommodate a range of uses that do not compromise one another, meet a range of policy goals and that can also help support the vitality and viability of the CAZ Retail Cluster. Policies should not preclude this.</p> <p><u>WCC proposed wording for PIM24 D g:</u> g— Significant residential uses are not considered to be acceptable</p> <p><i>PIM24 D does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with the City Plan and the London Plan.</i></p>	
<p>Paragraph 11</p>	<p>The opening statement that there is no evidence of a pressing case for large-scale redevelopment of the site to deliver public benefits is in itself a subjective comment without evidence and should be re-phrased or deleted. As aforementioned in PIM24 comments, it is unclear what</p>	<p><u>The PNF wishes to replace Paragraph 11 with the following comprehensive redraft, which address WCC's points:</u> <u>There have been various suggestions for redevelopment of the Queen Mother Sports Centre or large-scale development on the QMSC block. It would be possible to improve the</u></p>

'significant' development would be and where the 'central' area would encompass.

In regard to consideration of traffic impacts, this should apply to all potential uses, not solely community or leisure uses.

We believe that the wording of Paragraph 11 is overly restrictive. We welcome the Forum's support for office and retail uses on the site. However, restriction on the quantum of office floorspace or sizes of retail units is contrary to **City Plan Policies 1 and 13** as it does not help promote the city's business environment. Moreover, planning policy cannot control which type of business uses a retail / class E unit, if either independent or chain type. Furthermore, it is also not evidence-based that chain businesses can have a negative effect on the vibrancy of an area.

The NPPF requires policies to be positively worded and to contribute to sustainable development. The paragraph as worded is overly restrictive, without sufficient evidence and it is questionable whether it would help contribute to sustainable development.

WCC proposed change for Paragraph 11:

~~There is no evidence of a pressing case for large-scale redevelopment of the Queen Mother site on the grounds of improvement of the physical environment alone, as this could be achieved by simpler means. If there were to be significant proposals, it is vital that they should~~ Proposals for major redevelopment of the QMSC site must demonstrate how they meet the objectives and vision for the central area wider Pimlico Neighbourhood Area and contribute to the ambitions outlined within PIM 1 and address the problems set out above:

~~– If there is to be significant development, it should foremost support continuation of a sports facility of~~

physical environment of this block without large-scale redevelopment of the Sports Centre. Redevelopment of the Sports Centre would entail considerable public investment in an existing community building, so such proposals in particular should meet the objectives and vision for Pimlico as set out in Chapter 1 and for the Warwick Way/Tachbrook Street retail cluster as set out in PIM 1 and the requirements for public realm in PIM 22. Proposals for the block should address the problems set out above:

– Development needs to foremost support continuation of a sports facility of comparable scale and function as the Queen Mother Sports Centre, but should not be designed to attract significant additional traffic into the area, for example because of demand from outside Westminster or because it was of London-wide importance - that would be unacceptable so close to a residential area;

– Development which complements the larger offices in Victoria, for example office spaces suited to meeting the needs of smaller businesses would ensure a modest increase in footfall whilst supporting a more vibrant retail environment in the Pimlico Neighbourhood Forum Area and therefore should be encouraged;

– Business premises in Pimlico need to be of a scale and type that can attract the retailers best able to meet the needs of the Pimlico community, rather than as an extension of the larger footplate units in Victoria Street and Victoria Station. In order to meet these needs and to maintain the distinctive atmosphere of the urban village, any retail units should be small enough to support independent traders rather than be of a scale only likely to attract multiple chain stores.

PNF wishes to add a new paragraph, after Paragraph 11:

The community of Pimlico has been very clear that the benefits of wider improvements to the public realm are not justifiable at all costs. In this regard the character of Pimlico should not be compromised by an overly dense, tall redevelopment of the QMSC on the grounds that this is

	<p>comparable scale and function, but if it were to attract significant traffic, because of demand from outside Westminster or because it was of London wide importance, that would be unacceptable. <u>Major re-development of the site should ensure provision of a public leisure facility that serves the needs of the local community.</u></p> <p><u>-Proposals for new developments on the site should ensure that they promote sustainable transport methods and do not result in unacceptable impacts upon the highway in terms of traffic.</u></p> <p>– An office development meeting the needs of smaller <u>businesses and that provide local employment opportunities</u> could bring a modest <u>increase in</u> footfall within the <u>CAZ Retail Cluster</u> and support a more vibrant retail <u>and business</u> environment. and <u>In particular, smaller</u> offices that complement the larger offices in Victoria and therefore should be encouraged.</p> <p>— Any retail units should be small enough to support independent units rather than be of a scale only attracting multiple chain stores, to maintain the vibrancy of our area.</p> <p><u>-A range of Class E units which can contribute to the provision of new retailers and increase the diversity and retail offer within the CAZ Retail Cluster and Pimlico Neighbourhood Area will be supported.</u></p> <p><i>Paragraph 11 does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with the City Plan and the London Plan.</i></p>	<p><u>necessary to fund wider public realm improvements in Wilton Road/Warwick Way.</u></p>
<p>Paragraph 15</p>	<p>Paragraph 15 is a subjective comment on the current residential building at Hindon Court, without clear evidence to support it. Moreover, it is negatively worded and suggests residential uses on the QMSC site will be</p>	<p>Disagree. The paragraph seeks to contrast the scale of Hindon Court block with the humane scale and permeability</p>

	<p>unacceptable. City Plan Policies 1 and 8 seek to increase the number of homes within Westminster alongside appropriate intensification of the CAZ. It may be the case that some well-designed residential uses alongside commercial and community uses on the site could help meet City Plan strategic policy objectives. We therefore object to Paragraph 15 and suggest it should be deleted. Alternatively, this paragraph could be re-worded to outline that any future development should ensure that proposals are designed to include active frontages at ground level.</p> <p><i>Paragraph 15 does not meet the Basic Conditions as it is not in accordance with national policies and guidance and is not in conformity with the City Plan and the London Plan</i></p>	<p>of historic Pimlico, Lillington and Longmoore Gardens and Dolphin Square.</p>
<p>New Paragraph 16 to follow Paragraph 15 in submitted Plan</p>	<p>We would suggest that this paragraph is deleted as it is unreasonable to prevent potential developments within the identified site boundary that may come forward on the basis of a potential large scheme coming forward. New Paragraph 16 is overly restrictive and does not contribute to sustainable development. Notwithstanding this, PIM 24 concerns major redevelopment proposals; this new paragraph could stray into other levels of development.</p> <p><i>New Paragraph 16 does not meet the Basic Conditions as it is not in accordance with national policies and guidance.</i></p>	<p>The NPF wishes to add an additional new Para 16 to clarify how the policy handles smaller scale proposals: <u>16. Given the scale and nature of the block, proposals for part of the block for example for properties on a single street frontage may come forward. It is important that these proposals do not eliminate the potential for development of the remainder of the block to meet the requirements of Policy PIM24, particularly regarding matters around permeability. However, it is recognised that it may not be possible for some smaller proposals for part of the block to address the requirements of the policy.</u></p>
Glossary		
<p>Family Accommodation</p>	<p>The definition should reflect the City Plan Glossary definition on Family Housing. We suggest the second sentence of the definition is deleted as a definition should not justify need for family housing. As the Forum's definition conflicts with the City Plan definition on Family Housing, it may conflict with strategic policies and create confusion to the decision-maker. The definition should be deleted or explanation replaced quoting the City Plan definition.</p>	<p>The definition of family accommodation the City Plan Glossary uses is technical relating to consents, where we use it to describe issues with the current stock of housing. We don't think these suggestions will make any difference to the meaning of policies and would make the RJs less clear.</p>

	<p><i>The definition does not meet the Basic Conditions as it is not in accordance with the City Plan.</i></p>	
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Section 2 – Proposed modifications agreed between WCC and the Pimlico Neighbourhood Forum

Policy/Paragraph	Comment
Chapter 1	
Paragraph 2	When made, a Neighbourhood Plan becomes part of Westminster’s Local Development Plan. It sits alongside National Planning policies, the London Plan and Westminster’s City Plan 2019-2040 other policies . The policies contained within this Neighbourhood Plan are specific to the area and will be used by Westminster City Council when it determines planning applications <u>within the Pimlico Neighbourhood Area.</u>
Paragraph 30 and new paragraph 32	<p><u>Insert at end of paragraph 30 (but not as a bullet point):</u> <u>In addition, there are listed buildings in the Conservation Areas and outside the Conservation Areas. Their significance must be preserved.</u></p> <p><u>Insert new paragraph to discuss Heritage and Climate Change:</u> <u>While the Plan was under development, the ambition of “Net Zero” to address Climate Change issues was developed. The policies of conserving buildings should assist in achieving this objective and the policies for enhancing public realm should help promote walking for local journeys. There are two specific challenges that are beyond the scope of the Plan, but will need addressing in future policies: adapting space heating to non fossil fuels while respecting the heritage of the CAs, listed buildings and locally designated heritage assets and the role of the Pimlico District Heating Unit (PDHU) and its transition to non fossil fuel energy sources’.</u></p>
Chapter 2	
PIM1 A	<p><u>Agreed wording on PIM1 A:</u> A) The Warwick Way/Tachbrook Street CAZ Retail Cluster, and the Local Centres (as shown on the Policies Map) are the areas of a commercial/and mixed-use character to which commercial activity <u>main town centre uses that both serve visiting members of the public and provide active frontages should be</u> directed in Pimlico <u>within the Pimlico Neighbourhood Area.</u> In these retail centres, main town centre uses may be considered appropriate as advised below.</p>
PIM1 B	<p><u>Agreed wording on PIM1 B:</u> B) The Pimlico Parades (as shown on the Policies Map) are also small areas of mixed-use character <u>located</u> (within residential areas). and therefore pProposals <u>within the Pimlico Parades will be</u> are supported where they provide a mix of commercial <u>town centre</u> and community uses that to meet residents’ day to day shopping needs, provide local employment opportunities <u>such as small scale offices,</u> and support opportunities for community interaction.</p>
PIM1 C	<p><u>Agreed wording on PIM1 C:</u> C) <u>Proposals for hot food takeaways within 200m walking distance from the entrance of a primary or secondary school and/or within the Pimlico Parades will not be supported.</u> Due to the proximity of residential areas and the effect on amenity the Local Centres and Pimlico Parades are generally unsuitable locations for hot food takeaways, <u>In all identified retail centres .Proposals for new restaurants and hot food takeaways within the town centre hierarchy</u> must ensure that local environmental quality is protected by clearly and satisfactorily addressing the following...’</p>

	<p>a- Mitigating the detrimental impacts of customer and staff activities in respect of commercial waste, dirty pavements and noise, <u>by ensuring adequate waste storage arrangements</u>. In this regard, adequate refuse disposal points must be provided near the premises without creating obstruction on the pavement</p> <p>b- Units must provide adequate extraction and air conditioning which does not have an unacceptable impact on <u>the amenity of</u> residents living above or close to the unit <u>in terms of noise disturbance or odours, nor</u> on the appearance and structure of heritage buildings.</p>
PIM1 D	<p>Agreed wording on PIM1 D: D. Proposals in the Local Centres (Pimlico, Lupus Street and Moreton Street) and Pimlico Parades must in particular protect <u>and where appropriate enhance the</u> residential amenity, <u>including neighbouring properties of residents in the properties in those retail centres and in all adjacent residential properties.</u></p>
PIM1 F	<p>Agreed wording on PIM1 F: F) Proposals in the retail within the town centres <u>hierarchy</u> must ensure that alterations to buildings and their appearance do not have a significant level of harm <u>seek to minimise harm and make a positive contribution</u> to the heritage significance of the building or to its setting. This is particularly important in respect of commercial plant such as ducting and air conditioning and lighting and signage.</p>
Paragraph 3	<p>Agreed wording on Paragraph 3: The area is bounded by the railway, Vauxhall Bridge Road and the River, <u>Thames ...</u></p>
Paragraph 15	<p>Agreed wording on Paragraph 15: 'In the Pimlico Conservation Area parts of the Pimlico Parades have sadly lost a number of retail units and restaurants through their conversion into residential units (although there have been City Plan policies in place to protect retail units) and this has led to a deadening of some areas and a loss of vibrancy and attractiveness of streetscape as well as a loss of valued local facilities outside the CAZ <u>R</u>etail <u>C</u>luster.</p>
Paragraph 18	<p>Agreed wording on Paragraph 18: In 2020 the Government rationalised the various 'use classes' with the objective of improving the economic life of high streets. Under these changes, the following uses comprise one class <u>Use Class E:</u></p>
Paragraph 23	<p>Agreed wording on Paragraph 23: The mix of uses in the CAZ <u>R</u>etail <u>C</u>luster needs to be complementary <u>contribute</u> to its enjoyment as the retail and dining focus of Pimlico and to ensure that the limited public realm becomes more attractive. There will be only limited pavement space in relation to the population of the Forum area even if improvements are made. This area will at times need to accommodate on-street waste collection and should otherwise be prioritised for pedestrian use or the use of restaurant and café customers to dwell there rather than be dedicated towards increases in waste generation or delivery bikes. As noted already, an excess of hot food takeaways is considered as detrimental to the area's shopping, dining, browsing and pedestrian functions and is not a conducive environment for the many residential units above shops and restaurants, almost all of which are in historic buildings. <u>As required by City Plan Policy 16 and PIM 1, hot food takeaways are restricted close to schools. In other locations, we consider it important that proposals for such uses protect residential amenity as a priority."</u></p>
Paragraph 29	<p>Agreed wording on Paragraph 29: Typo correction: "Where shops have been converted to retail <u>residential</u> it has had a deadening effect".</p>
Chapter 3	

Paragraph 2	<p>Agreed wording on Paragraph 2: The Conservation Area Audits (<u>published by Westminster City Council</u>) recognise the coherent style of each of the original developments as well as the positive and negative contributions of alterations to those buildings or their replacements.</p>
Paragraph 4	<p>Agreed wording on Paragraph 4: “<u>CAZ Retail Cluster</u>”</p>
Paragraph 6	<p>Agreed wording on Paragraph 6: “<u>Publicly and privately owned trees make a strong contribution to the character of the conservation areas, for example the large London Planes in the Garden Squares, views of trees through the “Pimlico gaps” in the Pimlico Conservation Area which give a sense of the planting in rear gardens not visible from the long terraces (for example, picture on Page 26) and the value of trees to the setting of the Lillington and Longmoore Conservation Area</u>”</p>
Paragraph 9	<p>Agreed wording on Paragraph 9: “Overall the quality of the building stock is very high in terms of design, however the CAZ Retail Cluster, particularly Warwick Way and Wilton Road, does not reflect the quality of the area as a whole and the <u>maintenance of</u> commercial property, public realm and signage needs improving. The appearance is detrimental to its function as a shopping and restaurant area with the potential which prevents it realising its full potential to attract customers from outside Pimlico. ; this is damaging to the businesses located there.”</p>
PIM3 A	<p>Agreed wording on PIM3 A: A) In the Pimlico Conservation Area, upward extensions <u>should preserve or enhance the character and appearance of the Conservation Area and its townscape. should generally be in mansard form. Such mansards must: Upward extensions of original 19th Century terraced houses should generally be in mansard form. Proposals for new mansards should:</u></p> <ul style="list-style-type: none"> a- be in keeping with the prevailing design of mansards in the <u>terrace or group</u> (particularly in relation to whether a mansard is double-pitched or flat-roofed where this is the prevailing character) b- ensure that there is minimal <u>visual</u> intrusion to the <u>townscape</u> by having a traditional mansard form and scale (by having regard to the design principles set out in the guidance below) c-ensure they are subordinate to the main building by being clearly set back <u>or sloping behind the parapet</u>; and d- not being of excessive height. (by having regard to the design principles set out in the guidance below). <p>Appropriate guidance is provided in the Pimlico Design Guide. <u>d- in listed buildings, avoid harm to significance, preserve its character and special interest, retaining historic roof forms where these contribute to significance.</u></p> <p>See Table 1 for comments on the last sentence of PIM 3 A.</p>
Paragraph 20	<p>Agreed wording on Paragraph 20: <u>The Pimlico Conservation Area Audit (2006) provides a map (Figure 33) which sets out where: The Pimlico Design Guide has historically set out where</u> an upward extension would be allowed and has been generally followed. The main locations where an upward extension would not be allowed historically are:</p> <ul style="list-style-type: none"> – Terraces where there are some mansards already and where there is concern about allowing a ‘single tooth’. – Short terraces of 3 storey houses where there are no mansards at all (such as the Easternmost block in Hugh Street, N side).

	<p>– Longer terraces where there are no mansards at all (such as the N side of Denbigh Place, Moreton Street and the S side of Eccleston Square).</p> <p>– Certain postwar altered terraces (such as W <u>E</u> side of Winchester Street South of Sussex Street) which <u>rise</u> were extended to the mansard level of the nearby historic buildings).</p>
Paragraph 21	<p>Agreed wording on Paragraph 21: “The City Plan potentially allows upwards extensions in more locations than the Pimlico Design Guide <u>Pimlico Conservation Area Audit map</u> implies would be acceptable in order to add...”</p>
PIM4 A	<p>Agreed wording on PIM4 A: “Development proposals within or affecting the setting of the Pimlico Conservation Area should demonstrate well-detailed, high quality, sustainable and inclusive design and architecture which <u>respects preserves and enhances</u> the historic character of the Conservation Area.”</p>
PIM4 F	<p>Agreed wording on PIM 4 F: F) <u>When a new mansard is proposed for a terraced house, Development proposals which include the incorporation of a front roof terrace associated with an extension at mansard roof level will only should meet the following design requirements:</u> <u>a—In St George’s Square, Warwick Square and Eccleston Square, be acceptable where the front roof slope must be set back approximately 1.8 metres to allow a terrace behind the parapet-it is designed to maintain the uniformity of the streetscape and protects the significance of the building and the terrace of which it forms a part. Proposals for a roof terrace above the mansard floor level are considered to be out of keeping and will be resisted.</u> <u>B—In the grid streets (excluding the north/south avenues) the front roof slope must be set back no more than 1 metre.</u></p>
PIM4 G	<p>Agreed wording on PIM 4 G: G) Proposals for a rear roof terrace at mansard floor level will be permitted subject to demonstrating that <u>this:</u></p> <ul style="list-style-type: none"> • <u>it will not result in a loss of amenity or privacy to neighbouring properties;</u> • <u>it will preserve the character and special interest of listed buildings; and that</u> • <u>it will maintain uniformity within the townscape.</u> <p>Proposals for a roof terrace above the mansard floor level are <u>generally</u> considered to be out of keeping and will be resisted.</p>
PIM5	<p>Agreed new title: South Westminster <u>Peabody Avenue</u> Conservation Area (Peabody Avenue)</p> <p>Agreed wording on PIM5 (first sentence): ‘Development proposals within or affecting the setting of the South Westminster <u>Peabody Avenue</u> Conservation Area must <u>make a positive contribution preserve and enhance</u> to the character of the Conservation Area by being of consistent scale and preserving the tranquillity of the intimate layout of the buildings’.</p>
Paragraph 32	<p>Add at end of Paragraph 32: <u>In addition, there is a small section of the Peabody Estate north of Grosvenor Road and south of the Conservation Area. Given the proximity to the Conservation Area, particular care needs to be taken with proposals in this area to ensure they make a positive contribution to the character of Conservation Area.</u></p>
Paragraph 33	<p>Agreed wording on Paragraph 33: [...] so there needs to be great care that any additional buildings <u>in this Conservation Area</u> respect the existing heights and regularity of the roofline.</p>

PIM6	<p>Agreed wording on PIM6: Any dDevelopment proposals within or affecting the setting of the Lillington and Longmoore Gardens Conservation Area must make a positive contribution to <u>preserve and enhance</u> the character <u>and tranquility</u> of the Conservation Area and preserve by preserving the tranquillity and the intimate layout of the buildings while respecting and the spacious public realm between the buildings.</p>
PIM7	<p>Agreed wording on PIM7 A: A. Development which increases the density of Dolphin Square as a whole will only be acceptable if it provides a significant proportion of <u>should contribute to the provision of new family sized</u> new residential units as family accommodation <u>in accordance with identified need</u>.”</p> <p>Agree wording on PIM7 C: C.Any alterations or additions to the external facing elevations of the existing buildings <u>must positively contribute to local views and views from the River Thames</u>’.</p>
PIM8	<p>Change title: Non-designated heritage assets <u>Additional unlisted buildings and structures of merit.</u></p> <p>In addition to those already identified in the Westminster Conservation Area Audits, the following buildings are considered to be important but unlisted buildings of merit or structures of merit. Proposals affecting them should meet the requirements of Westminster <u>City Plan Policy 39</u> or any successor policy.</p> <p>a –The Additional <u>Unlisted Buildings of Merit identified in Appendix 3.</u> b – All unlisted red telephone boxes of the Giles Gilbert Scott designs (shown on Map 6).</p>
PIM10	<p>Agreed wording on PIM10 a: a- The use of high-quality signage from sustainable materials, with the use of plastic signage being strongly Resisted. <u>Where an application is made for new advertisements, the opportunity must be taken to replace displays harmful to visual amenity (such as internally illuminated plastic-faced signs) with ones more in keeping with the character and appearance of the building and surrounding area.</u></p> <p>Agreed wording on PIM10 b: b – The protection of original architectural detail and, where necessary, its restoration <u>Conserve, enhance and sensitively integrate original architectural detail.</u></p> <p>Agreed wording on PIM10 d: d – The sensitive incorporation of security measures other than external shutters. <u>External shutters should only be used where there are no reasonable alternative solutions which can provide adequate security.</u></p>
PIM11	<p>Change title: “Tall buildings <u>Building Height”</u></p>
PIM12	<p>Agreed wording on PIM 12: ‘When a building is deemed by a Conservation Area Audit as making a negative contribution to the Conservation Area, any alterations or replacements should be of high-quality having regard to its neighbours and the immediate setting of the building in the <u>C</u>onservation <u>A</u>rea, with no particular requirement as to the style to be adopted, <u>provided the design preserves or enhances the character of the Conservation Area.</u></p>
Map 6	<p>Change map and layer title: ‘Additional unlisted buildings <u>and structures</u> of merit Locally designated Heritage assets’.</p>

	<p>Remove 2 Russell House as already designated by the council.</p> <p>Re-order as needed.</p>
Chapter 4	
Paragraph 7	<p>Agreed wording on Paragraph 7: Typo correction: “are best addressed by plans policies in the City Plan”</p>
PIM13 Title and A	<p>Change title: Residential conversions <u>and extensions</u></p> <p>Agree wording on PIM13A: A.Any new <u>self-contained homes</u> residential units arising through conversions <u>and any extensions to existing homes</u> or any proposals to extend existing units must <u>should</u> meet or exceed the Nationally Described Space Standards, <u>having regard to the fabric of the existing building and the impact of any extension on the street scene.</u></p>
PIM14 Title	<p>Change to title: “New-build housing sizes and types in Pimlico”</p>
PIM14 A	<p>Agree wording on PIM14 A: A. To encourage the provision of housing that will address the needs of longer term residents, both now and as their needs change over time, nNew-build housing will be expected to ensure that all flat sizes <u>housing developments</u> must meet the Nationally Described Space Standards <u>(where the units are self-contained).</u> <u>At least 90% of the units must have a minimum one for at least 1</u> dedicated bedroom.</p>
Paragraph 10	<p>Agreed wording on Paragraph 10: Additionally, the Forum encourages the Council to prioritise the use of its enforcement powers on standards and building quality to ensure that unlicensed studios are made as safe as possible. <u>Some studio flats have arisen through conversions or change of use and are of a poor standard. Where licensing powers can be used to ensure that they are safe, this should be done. Otherwise, we encourage the council to use its enforcement powers on standards and building quality to bring this about.</u></p>
Paragraph 11	<p>Agreed to insert new text at the start of para 11: For the avoidance of doubt, policy PIM 14 applies to new build residential properties and to conversion <u>development or change of use</u> to residential from non residential uses (as distinct from residential buildings being converted which are dealt with in PIM 13).</p>
PIM16 A-D	<p>Agreed wording on PIM16 A-D:</p> <p>A.Proposals for the refurbishment of existing hotels in Pimlico are encouraged.</p> <p>B.Proposals for the conversion of hotels back to residential use, <u>particularly</u> where they are <u>reinstate</u> former family-sized houses, is <u>are</u> encouraged.</p> <p>C.Wholly nNew hotels are to be avoided in or adjacent to residential areas <u>directed to the commercial areas of the Pimlico Neighbourhood Area.</u></p> <p>D.Homes which have very limited self-contained living space and which are likely to be suitable only for short term letting will be</p>

	resisted.
Chapter 5	
Paragraph 1	Agreed wording on Paragraph 1: “ and the four garden squares”
Map 7	Agreed changes to the key: <ol style="list-style-type: none"> 1) Piazza spaces 2) Local green spaces (to be kept or removed, following a decision on PIM17) 3) Public open spaces
PIM18 Title and A-B	Agreed title on PIM 18: Title: “ Public -Open Spaces” Agreed wording on PIM18: A. Open spaces within residential estates <u>developments as shown on Map 8</u> should be preserved principally for the enjoyment of residents <u>and, where possible, be opened to the public.</u> Provision of infrastructure which <u>increases the quality of the open space enhances this</u> (e.g. seating, landscaping and planting) is encouraged. <u>along with</u> improvements to pedestrian accessibility <u>will be supported to open up these spaces for the enjoyment of visitors will also be supported.</u> B. In recognition of Pimlico’s deficiency in play space, <u>Proposals that would result in the loss of play space, especially if within a play space deficiency area,</u> will only be permitted if an alternative play space of at least the equivalent size and standard is provided in a location <u>in reasonable proximity and</u> accessible to the community. Any such provision should be made no later than the point at which the existing play space is closed to public use.
PIM19 A-C	Agreed wording for PIM19 A: Where possible, development p Proposals on or adjacent to <u>will enhance</u> the public realm are expected to enhance it, particularly where this rebalances space in favour of pedestrians over vehicle parking. In particular, proposals should take opportunities to reduce street clutter created by physical infrastructure. This includes: a – <u>seeking</u> removal of telephone boxes (other than the <u>ones that should be retained in line with PIM 8 or that are statutorily listed red telephone boxes of the Giles Gilbert Scott designs</u>) that are no longer in use for their original purpose; b – <u>seeking</u> removal of utility cabinets that are no longer required or <u>its</u> relocation to underground or adjacent buildings; c – provision of dedicated, fixed non-recyclable and recyclable waste collection infrastructure of a design, colour, material and scale in keeping with the character of the area; d – provision of sufficient short-stay cycle parking particularly for visitors to retail and office premises. Where it is not possible to provide suitable short-stay cycle parking off the public highway, identifying an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking; e – new developments providing cycle parking in line with the London <u>Plan</u> Cycle Design Standards. Agreed wording for PIM19 B: <u>The following areas (as shown on Map 7) Paved areas (plus the additional areas) at the following junctions as shown on the Policies Map</u> are designated as ‘piazza spaces’, including: [...]

	<p>Agreed wording for PIM19 C: Development on the 'piazza spaces' is expected to enhance its function as a public space and will generally be restricted to landscaping, planting and small public art installations. Development which requires the siting of waste and recycling infrastructure, cycle racks, public electric vehicle charging points and other street furniture not intended for use by the general public on the piazza space is expected to be located on the periphery of the space, avoiding the main areas dedicated to pedestrian footfall and congregation. Proposals to reduce such existing clutter on the piazzas are encouraged.</p>
Paragraph 15	<p>Agreed wording for PIM19 B: The locations of the 'piazza spaces' are shown on Map 7 the Open and Green space Map in this Chapter. The piazzas, at present, compromise both paved and unpaved areas.</p>
PIM20 Title	Change title: River cCrossings from Nine Elms to Pimlico
PIM20 (first bullet point)	<p>Agreed wording for PIM20 (first bullet point): Proposals for a new 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. In particular such proposals must demonstrate the following: – That they make a positive contribution to there is no loss of green space, open space or public realm in the Pimlico Neighbourhood Area as a result of the provision of built infrastructure associated with a bridge, in particular and to conservation areas, listed buildings and protected trees and parks, including in Pimlico Gardens or and St George's Square Gardens. Equally, such development should not compromise the operations of existing users of the area.</p>
PIM21 A-B	<p>Agreed wording on PIM21 A-B: A Development proposals on or immediately adjacent to the riverside are expected to maintain the open feel of the area, maintain, enhance and not adversely affect the riverside path, nor inhibit the completion of a riverside path for pedestrians, particularly in the areas of public realm. Proposals that enhance the general public's enjoyment of the riverside will be encouraged. These include pop-up cafés, provided they do not impede pedestrian movement. B. In recognition of its value as a public open space fronting onto the riverside, any dDevelopment proposals at Pimlico Gardens are expected to preserve its openness. Any such proposals must be of a very small scale and must demonstrably be required to retain it not affect its ability to function as a community use for the enjoyment of the general public. Proposals that secure activities complementary to the boating base are encouraged.</p>
Paragraph 16	<p>Agreed wording on Paragraph 16: The riverfront provides a contrasting but underused part of our area which could provide for more amenity and space for quiet enjoyment. This is all the more important given the lack of formal cultural and leisure venues other than the QMSC and the Dolphin Square gym. Riverside access has been safeguarded for a long time by WCC for a Riverwalk from Vauxhall Bridge to Chelsea Bridge. (Historically, Chapter 11 of WCC's UDP Policy RIV 9 on the 'Thames Path' provides for provision of and improvements to a public riverside path on the land side of the flood defence structures and directs the refusal of permission for developments that would 'remove, narrow or adversely affect the riverside path with the objective of completing a riverside path for pedestrians'). There has been a long-standing objective to establish a continuous Riverwalk for pedestrians between Vauxhall Bridge and Chelsea Bridge and City Plan Policy 31 provides for this to be secured in stages.</p>
Paragraph 17	Agreed wording at the start of Paragraph 17:

	The areas from which the river is viewed are the river path and Pimlico Gardens: From Pimlico Gardens there is a sense of a break in development and a “working river” rather than river activities ancillary to development like the build outs near Battersea Power Station and a contrast with the canyon feel of e.g. Lambeth between Lambeth and Vauxhall Bridges.
Paragraph 19	Agreed wording at the end of Paragraph 19: ...Boating Base. However, City Plan policy protects open space such as Pimlico Gardens and St George’s Square Gardens, and in addition resists the loss of waterfront enhancing uses.
Paragraphs 21 - 24	Agreed to move paragraphs 20 -24 to come after PIM 22 to avoid any confusion. Agreed wording on Paragraph 21: The impact of traffic passing through Pimlico has generally been well managed, largely being concentrated in the boundaries, but in the central area the amount of space dedicated to pedestrians, cycling and public realm, as opposed to drivers and parking <u>has resulted in a physical environment for residents and businesses which needs improvement</u> is problematic. With poor management and underinvestment, this has created an unattractive physical environment to the detriment of residents and businesses here. Agree wording on Paragraph 24 (add at the end): : the area a) Warwick Way between Vauxhall Bridge Road and Belgrave Road b) Wilton Road between Gillingham Street and Belgrave Road and the N end of Denbigh Street – first 4 units on either side).
PIM22 A-B	Agreed wording for PIM22 A-B: Proposals to increase capacity for pedestrian movement <u>within the Warwick Way/Tachbrook Street</u> Wilton Way/Warwick Road shopping area <u>CAZ Retail Cluster and neighbouring area</u> will be supported. In particular, proposals are encouraged to address the following: A. Highway works that create additional footway space, provided this does not increase traffic congestion. B. Design pavement space to allow pavement seating for cafés, provided this does not impede pedestrian movement <u>or have an adverse impact on residential amenity.</u>
Chapter 6	
PIM24 A	Agreed wording for PIM24 A a-d: A Proposals for all types of major development (including refurbishment, demolition and either partial or full redevelopment) must be justified against the following criteria: a – The height, bulk and massing of any proposals should respect the scale and character of the local built environment, in consideration of identified local views <u>and townscape</u> . It should maintain and <u>where appropriate</u> enhance neighbouring residential amenity and all other relevant material considerations . b – The design should preserve <u>conserve</u> and enhance the setting of heritage assets and maintain the open skies that are characteristic of Pimlico. c – Development must integrate well with the existing streetscape and not create disruptive physical barriers to pedestrian movement. d – Development should maintain and enhance permeability, <u>and seek to deliver new pedestrian routes where possible,</u> principally in the form of permanent public pedestrian routes that ideally are routed through the site.

Paragraph 10	<p>Agreed wording on Paragraph 10 – first bullet point: The block has been substantially developed piecemeal in the post-war period. There are interesting historic buildings which make a positive contribution to the area; the parade in Upper Tachbrook Street, the Patisserie Valerie building and the Gillingham Street terrace are all attractive <u>the handsome terrace of regency houses in 1-25 Gillingham Street (Grade 2 listed), the parade at 2-22 Upper Tachbrook Street and 54-55 Wilton Road which is a handsome turn of the Twentieth Century 2 storey and attic composition, and 74-77 Wilton Road'</u></p> <p>Agreed wording on Paragraph 10 – fourth bullet point: The parade on Upper Tachbrook Street has had mixed success with void periods for some shops and some longstanding businesses closing. But the shops have eventually been re-let and provide suitable locations for less-profitable or <u>small and</u> start-up businesses, with some notable successes among new and old businesses.</p>
Appendices	
Appendix 3	Update date of 137 Grosvenor Road so it is 1994.
Appendix 3	<p>Add text about phone boxes: The red telephone box is universally recognised as an icon of urban design and an essential part of the London streetscape. The boxes at the junction of Gloucester Street and Belgrave Road are of the type known as K6, designed by Sir Giles Gilbert Scott – architect of Battersea Power Station and Liverpool Cathedral -- as a cheaper version of his K2, at a time when the network of public call boxes was being extended. Having been introduced in the 25th year of George V's reign, they became known as the Jubilee Kiosk. Smaller than the K2, it has horizontal glazing bars and something of the streamlined aesthetic associated with the Art Deco or <i>moderne</i> style of the moment. Nevertheless, the principles of the design remained Classical, making the boxes particularly appropriate to Cubitt's Pimlico. Thousands were made, a tribute to the era in which a public utility saw itself as having a public responsibility to maintain design standards on Britain's streets. They remain a symbol of Britain.</p>
Glossary	
CAZ	Amend 'Forum Area' to 'Pimlico Neighbourhood Area' for consistency.
Major Development	<p>Agreed to replace 'Major Development' definition with: <u>'Development greater than or equal to:</u> – 10 residential units; or – 0.5 hectares site area (residential) or 1 hectare (non-residential); or – gross floorspace of 1,000 sq m (GIA).'</p>
Pimlico Forum Area	Amend 'Pimlico Forum Area' to 'Pimlico Neighbourhood Area' for consistency.

Section 3 – Other proposed modifications suggested by WCC

Policy/Paragraph	WCC Comment	PNF Comment
General	<p>For consistency, the Plan the same terminology should always be used (e.g. the terms mansards, roof extensions and upward extensions or Core Retail Cluster and CAZ Retail Cluster are used interchangeably) not to create confusion.</p> <p>The use of acronyms should be avoided. If used, they should be explained in the Glossary.</p> <p>When referencing data and other figures, a reference to the source should be added in a footnote.</p> <p>When talking about the Neighbourhood Area, expressions like “area” or “Forum area” should not be used.</p>	<p>We will check the plan for references to mansards/roof extension/retail cluster and Forum Area.</p> <p>The sources for “residents want “are clearly set out in the consultation statement, however frequent references in the plan would disrupt the style.</p>
Chapter 2		
Map 2	<p>The map is unclear as it is trying to show too many layers. Officers are happy to work with the Forum and produce a clearer map.</p> <p>The key should be updated for consistency:</p> <ol style="list-style-type: none"> 1) Piazza <u>spaces</u> 2) Local green spaces (may need to be deleted as per comments for PIM17) 3) CAZ core <u>R</u>retail <u>C</u>luster 4) Queen Mother Sports Centre <u>block</u> (boundary may need to be amended as per comments for PIM24 D) 5) Unlisted <u>local</u> buildings <u>and structures</u> of merit (as per comments for PIM8) – map to be clarified (e.g. two phone boxes to be shown) <p>All mansards layers may need to be deleted as per comments for PIM 3.</p> <p>It would be helpful if the key distinguished which designations are specific to the Plan and which are designated by the City Plan.</p>	<p>We agree that Map 2 is quite difficult to read, but has merit as an omnibus map. Other maps show the individual elements concerned, so this should not be problematic. The key will need to be updated to reflect decisions on PIM 17 and PIM 24.</p>
PIM1 H	<p>As set out in the council’s Regulation 16 response, PIM1 H would sit better under the heading “Heritage impacts” rather than under “Establishing the viability of an existing use”. Although PIM1 H is supported and it aligns with</p>	<p>The PNF would like to retain PIM1 H as submitted, but agree to move Clause H to “Heritage impacts” after Clause F.</p>

	<p>City Plan strategics Policy 40 B, the last sentence strays into justification and should be removed. PIM 1 H should be amended to just require an appropriately designed active frontage.</p> <p><u>WCC proposed change for PIM1 H:</u></p> <p>H. In any retail centre, pProposals <u>within the town centre hierarchy</u> to amend the appearance of a unit's frontage must demonstrate high quality design that is in keeping with the character of the area. This must provide, as far as possible, a visually active frontage to the property at ground floor level. A visually active frontage excludes the preservation of a shop frontage appearance with frosted or otherwise opaque glass.</p>	<p>The words “as far as possible” in PIM1 H do permit some frost/opaque glass, but not so much as to detract from the streetscape.</p>
Paragraph 4	<p>We suggest that the paragraph references the more up to date Town Centre Health Checks (2019) the council carried out for the CAZ Retail Cluster.</p>	<p>Not essential for the justification.</p>
Map 3	<p>We suggest the map is called “Retail areas <u>Town centre hierarchy</u>”. This is the terminology used in the City Plan, it should therefore be used to avoid any confusion and to acknowledge that town centres are not only retail centres.</p> <p>The key should be updated for consistency: CAZ core <u>R</u>etail <u>C</u>luster</p>	<p>Disagree. Commercial Areas is a clearer term than town centre hierarchy, explaining what the map is about. See comments for Map 2 and comments on PIM 1D.</p>
Paragraph 6 & 7	<p>We suggest using the word “designate” instead of “defined” to be in accordance with national policies and guidance.</p>	<p>The PNF disagrees with WCC comments.</p>
Paragraph 15	<p>As set out in the council's Reg 16 response, Paragraph 15 should be worded more positively. It also currently reads as being subjective. We therefore have concerns with this paragraph, and it should reference responses received during consultation (in a footnote) if to be retained.</p>	<p>The PNF disagrees with WCC comments. The issues in Para 15 were identified in the earliest consultation.</p>
Paragraph 16	<p>As set out in the council's Reg 16 response, Paragraph 16 could reference the more up to date Town Centre Health Checks (2019) the council carried out for the CAZ Retail Cluster. It is unclear what “to meet the shopping and dining needs of the Forum area and the broader catchment area” means and it reads somewhat ambiguously. It is also unclear how those needs are not being met and why “visitors” are not mentioned. Paragraphs 11-15 note the importance of retail in the area at meeting local need, therefore it could be questioned whether Para 16 is necessary and if it could be deleted.</p> <p><u>WCC proposed change for Paragraph 16:</u></p>	<p>The PNF disagrees with WCC comments. We think the reference to the shopping and dining needs is clear: we identified a problem that residents wanted to be able to shop and dine close to home and regretted that they were obliged to shop outside the Neighbourhood area for some goods and types of services. These particular local needs are not picked up by the broad approach of a Town Centre Health Check.</p>

	<p>It is well understood that even before Covid-19 that retail was increasingly challenged in general. However it seems clear that there is a missed opportunity for the CAZ retail cluster, Local Centres and Pimlico Parades to meet the shopping and dining needs of the Forum area and the broader catchment area. The large increase in population since 2001 and its strong economic characteristics (population in work) indicate that investment (of which improved streetscape and public realm is the most needed) could help attract new demand back into the area from residents and office workers (moving back from shopping and dining elsewhere). This view was confirmed by the 2013 Retail Healthcheck for the Warwick Way/Tachbrook Street area. However, the significant increase in population in the <u>Neighbourhood Area since 2001 and its strong economic characteristics indicate that investment could help attract demand into the area whilst the growing number of residents, workers and visitors could increase footfall and support the commercial vitality and vibrancy of the town centre hierarchy. The town centres should continue to meet local shopping needs. The strength of commercial centres, and their retail provision, was supported by Westminster City Council's 2018-2019 Town Centre Health Checks; policies seek to maintain and support these centres and their functions.</u></p>	
<p>Paragraph 17</p>	<p>As set out in the council's Reg 16 response, Paragraph 17 could be clarified to explain which "other retail and commercial areas" it is talking about. It would be helpful if this paragraph also explained what the City Plan expects from each type of centre by being in accordance with City Plan Policy 14.</p> <p>WCC proposed change for Paragraph 17: The City Plan sets out specific functions for the <u>Warwick Way/ Tachbrook Street CAZ retail cluster</u> s in Westminster, which could include provision of large format retail and town centre uses that meet the needs of residents, workers and visitors. But it also recognises that the other retail and commercial areas <u>within the town centre hierarchy, including the designated Local Centres</u> which , should have functions that <u>meet residents' day to day shopping needs, provide local employment opportunities, and support opportunities for community interaction,</u> serving a more limited neighbourhood <u>scale, with uses reflecting and appropriate to their</u> scale and proximity to residential areas. Such uses may relate to and the fact that they may comprise heritage assets <u>(listed buildings, conservation areas and designated landscapes)</u> and have townscapes needing protection. That should be preserves and enhanced.</p>	<p>The PNF disagrees with WCC comments.</p> <p>We resist the changes to the first sentence as misleading as the provision of large format retail and town centre uses are implausible in almost all of the Warwick Way/Tachbrook Street CAZ retail cluster, when the vast majority of frontages in Warwick Way, Denbigh Street, Upper Tachbrook Street and Churton Street are historic within the Conservation Area and the policy is carved out by heritage constraints. In addition, the frontages within Denbigh Street (within the Warwick Way/Tachbrook Street CAZ Retail Cluster) are primarily residential at ground floor level and therefore protected from non-residential uses.</p>

<p>Paragraph 20</p>	<p>As set out in the council's Reg 16 response, it is unclear why only certain areas of the centre are suitable for retail, dining and other services that meet the needs of local residents and office and other workers. Whilst we support encouraging concentration of new commercial uses to the CAZ Retail Cluster, this should not be at the expense of other designated centres. To be clearly in accordance with City Plan Policy 14 (see paragraph 14.19), the Plan should welcome town centre uses that make a major contribution towards the strategic functions of the CAZ in the whole centre. CAZ Retail Clusters should not only meet the needs of residents but also of workers and visitors.</p> <p>WCC proposed changes for Paragraph 20: The Warwick Way/Tachbrook Street CAZ Retail Cluster should be the focus for <u>improved</u> retail <u>provision</u> within the Forum Neighbourhood Area, <u>however retail and other complementary town centre uses will continue to be supported elsewhere within the town centre hierarchy, in accordance with PIM 1.</u> This plan envisages in particular Warwick Way/Wilton Road, Upper Tachbrook Street, the part of Denbigh Street adjacent to Warwick Way and the market area <u>the CAZ Retail Cluster</u> as predominantly retail, dining or other services that meet the needs of local residents, workers <u>and visitors</u> – both <u>contributing to</u> the day time and night time economy.</p>	<p>The PNF disagrees with WCC comments. As pointed out above, parts of Denbigh Street within the Warwick Way/Tachbrook Street CAZ retail cluster are entirely residential and therefore not suited to all or perhaps any main town centre uses. Other areas within the CAZ retail cluster are so close to residential properties that not all main town centre uses will be practicable. This paragraph relates only to the CAZ retail cluster and should not be muddled with references to other town centres, which are dealt with in other paras later.</p>
<p>Paragraph 24 & 25</p>	<p>Although Class E means in many instances changes of use to offices may be possible without the need for planning permission, offices within the town centre hierarchy should provide active frontages, in accordance with City Plan Policy 14. Furthermore, PIM 1 outlines circumstances where smaller scale offices may be acceptable. In addition, paragraph 25 is unclear and ambiguous as to where offices would be encouraged.</p> <p>WCC proposed changes to Paragraphs 24 & 25: 24. Churton Street, the remainder of Denbigh Street in the CAZ Retail Cluster and the terrace in Tachbrook Street are well served by public realm. These streets are well suited to retail, dining and other town centre uses. <u>Although all uses within the town centre should provide active frontages and it may be difficult to control changes of use within Class E, small offices should be directed to those areas of the town centre where they would not compromise the vitality of the frontage. If however there is insufficient demand from these uses, then small scale offices would provide</u></p>	<p>No action proposed. See comments about Denbigh Street. Paras 24 and 25 are the view of the Forum about how best to distribute uses should (as seems likely) there be an excess of ground floor units needed for retail or dining.</p>

	<p>an alternative use at ground floor level which could support the retail and dining and peacefully co-exist with them and with neighbour residents.</p> <p>25. The preference would be, if necessary, to concentrate offices outside Warwick Way and Wilton Road to enable the concentration of retail and dining there and to separate it from residential.</p>	
Chapter 3		
PIM3 A	<p>As set out in the council's Regulation 16 response, the last sentence of PIM 3 A should be removed as the Pimlico Design Guide is a bit old and could be replaced during the Plan's period. We have suggested the Forum to include drawings of the guide in an Appendix or different document to illustrate. The Conservation Area Audit which includes a map that postdates the audit of where roof extensions may and may not be acceptable is also not referenced in this Plan. If to be retained, the sentence should be redrafted to acknowledge the document could be revoked.</p> <p>WCC proposed change for PIM3 A: Appropriate guidance is provided in the Pimlico Design Guide.</p>	<p>The PNF would like to retain the reference that "Appropriate guidance is provided in the Pimlico Design Guide" at the end of the last paragraph in PIM3 A. Given the nature of buildings in Pimlico, there is little evidence to justify any review of the PDG removing guidance on mansards.</p>
Paragraph 24	<p>As set out in the council's Reg 16 response, policies in this Plan are often more prescriptive than policies in the City Plan. In this sense, it is not considered that policies in the PNP represent a "liberalisation" compared to the City Plan.</p> <p>The paragraph suggests only family sized homes are in need within the Neighbourhood Area and that PIM 3 will contribute to increasing housing stock. As explained in this SoCG and below for PIM13 B (Chapter 4), there is a need for all types of housing in Westminster and it is unclear how policies in this Plan will help deliver more homes. Paragraph 24 should be deleted.</p> <p>WCC proposed changes to Paragraph 24: This is a liberalisation of existing policy as regards location and will help contribute towards the strategic objective of increasing the stock of high-quality housing. In Pimlico the type of stock that is required to support the changing needs of the local community is family housing and this can be delivered while keeping an attractive roofline. Provided the form of the upward extension is of mansard type and of the scale set out in the Pimlico Design Guide, the townscape will be maintained.</p>	<p>We consider that our response in respect of PIM 3 B explains why we think our policy is a liberalisation and why the policy is needed. No change proposed.</p> <p>Because PIM 3 B adds to the number of places where upward extensions are permitted, it should provide for more or larger homes. The needs of Pimlico are set out in our Housing Technical Note. What is clear however, is that reducing the number of sites where upward extensions are allowed, which is the effect of WCC's proposed changes, will not help provide homes on those sites.</p>

<p>PIM4 I</p>	<p>As set out in the council's Reg 16 response, in some circumstances, depending on the prevailing character within a street, some infilling, for example beneath the entrance bridge may be considered acceptable. PIM4 I should be redrafted to take that into account.</p> <p><u>WCC proposed changes to PIM4 I:</u> Development proposals for projecting porches over external basement doors are generally not considered acceptable and will only exceptionally be permitted where it can clearly be demonstrated that they do not have a detrimental effect on the sense of openness between the street and the front elevation of the building or where they reflect prevailing character.</p>	<p>Disagree: The proposed drafting is risky and likely to be too subjective in practice.</p>
<p>Paragraph 42</p>	<p>To take into account changes proposed to PIM7 and agreed between WCC and the PNF, Paragraph 42 should be redrafted to reflect that any new housing should contribute to meet Westminster's housing needs, including but not only the need for family-sized accommodation. We also suggest that instead of saying that housing should not be designed for people that are in Pimlico only for a short time, the Plan explains the issue with short-term letting and how it should be avoided on site.</p>	<p>Disagree. No change proposed, this para is just a forward reference to Chapter 4 introduction, which covers the context fully.</p>
<p>PIM 8, Paragraph 43, Map 6 and Appendix 3</p>	<p>As explained in the council's Regulation 16 response, the council supports the "designation" of unlisted local buildings and structures of merit. The council also supports the designation of the buildings listed in Appendix 3.</p> <p><u>Phone boxes</u></p> <p><u>Map 6 and Appendix 3</u> Map 6 which shows the location of the two telephone boxes referenced in PIM8. However these have not been included within Appendix 3. Appendix 3 should include pictures of the two phone boxes.</p> <p>It should also be noted that some phone boxes could be removed without planning permission, through permitted development, this should be clarified within the reasoned justification. Furthermore, in some instances, where phone boxes are not 'adopted', they can in some instances give rise to issues of anti-social behaviour or disrepair, harming visual amenity. This should be discussed within the reasoned justification.</p> <p><u>We suggest new reasoned justification in relation to phone boxes is added, to complement Paragraph 43:</u></p>	<p>We recognise that PDRs relating to unlisted phone boxes may mean that permission is not needed, but then the Plan does not apply. We think the proposed WCC addition would make this section too long</p> <p>PNF propose a small change. Para 43 change "Some of the audits are not entirely clear or up to date about justifying why all of the buildings have been designated in this way or not."</p>

	<p>Telephone boxes are often allowed to be placed upon the pavement without planning permission, through permitted development and a condition of this permitted development is that once the telecommunications use ceases, the equipment should be removed. Therefore, there is a requirement on telecoms companies to remove telephone boxes when they are no longer required for communications purposes in order to comply with the requirements of the General Permitted Development Order. In some instances, if such telephone boxes are left in a state of poor maintenance, they can cause visual harm and give rise to anti-social behaviour. However, these historically designed telephone boxes, when well maintained, or when an alternative use can be found, can make a positive contribution to the character of the area. Proposals for planning permission to retain these phone boxes will be supported where it is clearly demonstrated that they make a positive contribution.</p> <p>Paragraph 43 is subjective noting that Westminster's Conservation Area Audits are not clear in which buildings are designated as Unlisted Buildings of Merit. We believe Conservation Area Audits are clear in relation to the buildings designated as Unlisted Buildings of Merit. Therefore, we believe it should be more positively drafted.</p>	
<p>PIM10 c</p>	<p>As set out in the council's Reg 16 response, whilst we support most of the principles in PIM10, it is very prescriptive and includes detailed explanation: examples of what would be acceptable should be moved to the RJ. Moreover, standards may change overtime and the policy would become outdated. We therefore suggest a more general clause and new RJ paragraph.</p> <p>WCC proposed changes to PIM10 c: c – If external lighting of a shopfront or commercial premises is proposed, this should involve lights complying with the highest standards in the latest relevant British Standard for energy efficiency. Lighting should seek to highlight the character of the property frontage and enhance the local setting whilst protecting the visual amenity of the area by using appropriate methods of illumination. Outward facing bright lights, neon signage and flashing lights are generally not considered to be acceptable.</p> <p>WCC proposed new RJ:</p>	<p>Disagree. The last sentence of PIM 10 C that WCC proposes to delete covers the types of signage that cause the very problems the policy is seeking to address. Therefore, it is important that this wording is included so that the policy is clear and unambiguous.</p>

	<p>External lighting should seek to comply with the latest relevant British Standard for energy efficiency. Outward facing lights, multicoloured, strobe or flashing lighting are considered harmful to amenity in most cases, especially to historic buildings and within Conservation Areas. Discrete methods of illumination could include downward trough lighting or halo illumination of signage or lettering. Similarly, neon signage can appear incongruous to the historic character of the Pimlico Conservation Area, if overly dominant and not sensitively designed.</p>	
Chapter 4		
<p>Paragraph 8</p>	<p>It is unreasonable to state that housing stock should be mainly attractive to “longer term residents”. In line with City Plan Policy 12, all new homes and residential extensions should be designed to a high quality and, where possible, meet or exceed the NDSS. The paragraph is negatively worded and could be read as exclusionary. Any evidence papers that show that Pimlico has poor quality housing stock should be referenced in a footnote. This paragraph should be redrafted.</p> <p>PIM13 A (which this paragraph relates to) applies to new self-contained units arising through conversion or extension. It is unclear why the PNF mentions HMOs in this SoCG as the policy is not trying to address HMOs but housing in general.</p>	<p>PNF propose minor change. We are saying that the housing stock needs to be of sufficient <u>quality</u> to be attractive to longer term residents and not be of a standard suited only to very short term residents (which is not to say that higher quality stock shouldn't be let to tenants not here for the long term). It is clear that much historic stock is not meeting the NDSS and is of poor quality by that measure.</p> <p>In addition, in 2020 WCC consulted on licensing HMOs including S257 HMOs which are certain older converted flats in houses but not within the HMO Use Class. In the event it decided not to proceed fully with S257 licensing. However the consultation document https://www.westminster.gov.uk/housing/private-sector-housing/houses-multiple-occupation-hmo/additional-licensing-scheme-consultation has an extensive analysis of the number of potential S257 HMOs in Warwick, and Tachbrook Wards which suggests that some 500 properties could have been potential S257 HMOs. Across Westminster these properties have certain hazards and have been subject to enforcement notices. The consultation document sets out the number of enforcement notices in Warwick Ward in recent years. For this reason we believe that WCC has plenty of evidence about the poor quality of some of the</p>

		<p>private rented stock in converted houses. It is not necessary to repeat this analysis on the face of the PNP.</p> <p><u>PNF propose minor change to Paragraph 8.1:</u> Conversions and additions to existing buildings are the most likely ways in which extra space will become available for housing in Pimlico, especially in the conservation areas. The stock needs to be of sufficient quality to be attractive to longer term residents and not be designed to only be suitable for short term lets with lack of storage space. Many of the conversions of the historic stock have resulted in units that are very small by current standards and there is an opportunity to address this through planning.</p>
Paragraph 21	The Plan could reference City Plan Policy 8 and its RJ about short-term letting.	Disagree. Not needed
Chapter 5		
Paragraph 5	<p>Par. 5 could reference the City Plan (see Figure 27) which shows how parts of Pimlico are an Area of Play Space Deficiency.</p> <p>WCC proposed change for Paragraph 5: There is little play space for children beyond that offered by the private squares, to which most residents don't have access. <u>Most of Pimlico is shown as an area of play space deficiency in Westminster's City Plan.</u> St George's Square provides grass, but no playground facilities and ball games are forbidden. There are only a few purpose-built playgrounds such as the one behind the Post Office on Vauxhall Bridge Road.</p>	Disagree. Not necessary and would disrupt the flow. This paragraph is meant to be descriptive and convey what Pimlico is like. Not just shoe horn the description into the language of the City Plan with excessive references.
Paragraph 6	As explained in the council's Reg 16 and above for PIM17, we do not believe the Local Green Space designation is necessary and evidence-based. It is also unclear what a 'formal' green space. Paragraph 6 should be deleted or amended, in line with changes to PIM17.	No change proposed. The formal spaces are defined in para 6.
PIM20	"Fourth and fifth bullet points" - These points stray into non-land use matters. It is also difficult to know how they will be enforced. As drafted, these paragraphs read as if more people walking and cycling in Pimlico was a problem (this would be contrary to City Plan Policy 25). We	Fourth and fifth bullets, no change proposed. The point isn't about enforcement, it's to ensure that a design demonstrates how these desirable

	<p>suggest these paragraphs are merged and redrafted to be more positive.</p> <p><u>WCC proposed change for PIM20 (second bullet point to end):</u></p> <ul style="list-style-type: none"> – That they would not compromise a continuous Riverwalk along the north bank of the Thames through Pimlico and to neighbouring riverside areas. – That they would not compromise the operation of the Westminster Boating Base. – That the increased cycle traffic through the residential areas of Pimlico and Churchill Gardens will be properly managed to ensure no conflict with pedestrian movement and other residential activity. – That the increased pedestrian traffic through Pimlico, especially through St George's Square Gardens or the area adjacent to Pimlico station, will be properly managed to ensure pedestrian routes do not become overloaded. This includes expected traffic (pedestrian or otherwise) through residential areas due to events in Battersea that attract large numbers of visitors. 	<p>outcomes will be achieved.</p>
<p>Paragraph 27</p>	<p>As explained in the council's Reg 16 response, the second bullet point is unclear who would pay the landlords, we suggest this is deleted as it is unreasonable. On the third bullet point, parking is a strategic matter that is better dealt with by the City Plan, furthermore this sentence is unclear. The fourth bullet point is unclear who will fund new signs, we suggest this is also deleted as it is unreasonable.</p> <p><u>WCC proposed change for Paragraph 27:</u></p> <p>The following steps would improve matters:</p> <p>Wilton Road</p> <ul style="list-style-type: none"> – Replace paving over time with a uniform paving that can be maintained without harming the appearance. – Pay/eEncourage landlords to improve their part of the pavement with more consistent materials as a condition of any planning they need. – Widen the pavement at the expense of parking spaces. Parking for deliveries and disabled persons would need addressing, perhaps along the lines of This has been done successfully in Elizabeth Street. – Enforce existing signage policy or even fund and provide improved signs. – Remove unnecessary clutter (and prioritise new necessary infrastructure 	<p>We accept the inclusion of the reference to disabled persons, but otherwise disagree with the changes. The provision of improvements could be brought about by planning conditions, CIL funding, Ward Budget funding and is the sort of thing that placemakers have proposed elsewhere in Westminster. PNF considers these are creative ideas that the local community has proposed and it would be a pity to lose them.</p>

	<p>to the side streets.</p> <p>– Permit street-side cafés; residents are very appreciative of tables on the pavement where pavements are wide enough. Pavements however are not at present sufficiently broad, especially near the junction with Warwick Way to serve what has become an important area for restaurants</p> <p>– Restrict the clustering of fast food takeaways.</p>	
PIM24 A e	<p>WCC proposed change for PIM24 A e:</p> <p>e – Development should provide (including by retention) publicly accessible open and green space as part of comprehensive landscaping proposals to enhance the local environment. It shall be ensured that all such provision shall be capable of being easily maintained.</p>	Disagree.
PIM24 B	<p>As explained in the council's Reg 16 response, it is unclear what a “barrier wall effect” and “high development” mean in Clause B.</p> <p>WCC proposed change for PIM24 B:</p> <p>B. Any major development proposals on sites adjacent to the riverside should improve public access to the riverfront or provide or enhance public realm by the riverfront. In addition, any such development must recognise the particular sensitivity of the riverside area to the ‘barrier wall’ effect that high development is likely to create.</p>	Disagree. We are seeking to discourage the sort of continuous high rise development along the E side of the river between Lambeth and Vauxhall bridges, which would be completely at odds with Pimlico’s historic and twentieth century development.
PIM24 C	<p>As explained in the council's Reg 16 response, listed buildings and sculptures are already protected and managed by other policies: it is unclear how PIM24 can protect it further.</p> <p>WCC proposed change for PIM24 C:</p> <p>C. Any major development proposals around or adjacent to Pimlico Station should enhance the public open space serving the area, whilst preserving the listed buildings, the listed Paolozzi sculpture and considering the positive contribution of <u>neighbouring buildings and heritage assets.</u> other adjacent properties.</p>	No change proposed. The list is here to sum up the important landscape and modern heritage features when considering proposals on this block.
Appendices		
Appendix 2	As explained in the council's Reg 16 response, to recognise the mixed-use character of these areas, we suggest the Appendix is called “Town Centres”	These changes are unnecessary This is background information to support and help justify

	<p>instead of “Retail and commercial areas”.</p> <p>To avoid confusion, the terminology used should be in accordance with the City Plan (e.g CAZ Retail Cluster and not Retail Cluster). It would be helpful if the text recognised some centres are split in the table to inform the analysis but do not form centres themselves and that some centres are split between Pimlico and other Neighbourhood Areas (e.g. Lupus Street). The text should also explain that the Tachbrook Street Market is not part of the CAZ Retail Cluster.</p>	the policies.
Glossary		
CAZ Retail Cluster	We suggest that you simplify the definition and omit references to the streets as this seems overly complicated for the purposes of a definition whilst it misses out key streets that are part of the centre. Streets that form the cluster are already clearly shown on maps so it does not need to be repeated. The definition could describe the activity of the cluster, to align with the City Plan Glossary definition	Disagree. The CAZ retail cluster isn't a list of streets, it is a property-by-property designation
Designation	We suggest this is deleted as it is unnecessary to define whilst it is too broad. The current definition omits other types of designation.	Disagree.
Historic Stock	We suggest this is deleted as too broad.	Disagree.
Local Centres	The definition could describe the activity of the centres, to align with the City Plan Glossary definition.	Disagree as this is already included in Appendix 2.