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Report on Pimlico Neighbourhood Plan 2021-2040

An Examination undertaken for Westminster City Council, with the support of the Pimlico Neighbourhood Forum, of the April 2021 submission version of the Pimlico Neighbourhood Plan.

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Main Findings - Executive Summary

From my examination of the Pimlico Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Pimlico Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – Pimlico Neighbourhood Area, as shown on Map 1 of the Plan;
- The Plan specifies the period to which it is to take effect – 2021-2040; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Pimlico Neighbourhood Plan 2021-2040

- 1.1 Pimlico occupies a Central London location within the City of Westminster. The Neighbourhood Plan area has a roughly triangular shape bounded by Victoria station and the railway line to the west, Vauxhall Bridge Road to the north-east and the northern bank of the River Thames to the south. The area between Lupus Street and Grosvenor Road in the south-west, occupied by Churchill Gardens, is excluded from the Neighbourhood Area, as illustrated on Map 1. The character of Pimlico was established in the nineteenth century when Thomas Cubitt, master builder and entrepreneur, constructed a grid of streets on formerly marshy land around the existing Warwick Way, Lupus Street and Tachbrook Street. Late-Georgian in style, the development consisted of predominantly terraced housing, with repetition of its architectural features notably door cases and windows. Roofs were mostly concealed behind parapets and parapet lines were continuous along the terraces.
- 1.2 The housing was built to a hierarchy of scale which reflected the social structure of the nineteenth century. Around Eccleston Square, Warwick Square and St George's Square, substantial five storey housing with basements was built for more affluent residents. Streets containing more modest accommodation, mostly three bedroom dwellings on 2 or 3

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storeys, were designed for less affluent households. Peabody Avenue in the south-west of Pimlico (see Map 4) was built in 1868 as one of the earliest social housing estates to provide workers' housing. Subsequent development in the twentieth century was more piecemeal. Notable developments were the Tachbrook Estate and Dolphin Square, built in the 1930s, on former industrial sites. Tachbrook, with 6 & 7 storey flats and gardens, was designed for workers by the Westminster Housing Association. Dolphin Square, comprising some 1,200 flats, with support facilities – shops, a restaurant and sports centre – was a predominantly red brick development rising to 9 storeys with arched entrances facing Grosvenor Road. Post-second world war development, including some schemes responding to bomb damage, are described in the first section of the Neighbourhood Plan. Lillington Gardens, low-rise flatted development adjacent to the historic church of St James the Less, and Longmoore Gardens (three blocks of flats around a courtyard garden), are major schemes built between the 1960s and 1980s.

- 1.3 Currently, nearly all Pimlico lies within one of four Conservation Areas, where the law requires that the character and appearance of the area should be preserved or enhanced. The designated Conservation Areas (Pimlico, Peabody Avenue, Lillington and Longmore Gardens and Dolphin Square) are shown on Map 4 of the Plan. Pimlico also adjoins the Churchill Gardens Conservation Area in the south-west. Pimlico is a predominantly residential area, and the Neighbourhood Plan emphasises the “quiet village atmosphere” of the environment. Pimlico contrasts markedly with Victoria station and Victoria Street to the north, where substantial office and commercial premises are predominant. The 2011 Census recorded some 17,500 “usual residents” living in 9,500 households in Pimlico, over 90% of whom lived in flats. Between 2001 and 2011, the population increased by 21%, and it is estimated that a further 10% has been added since 2011, despite limited amounts of new home-building.
- 1.4 Immediately to the west of Pimlico is the Victoria Opportunity Area, designated in the London Plan for an indicative new 1,000 homes and 4,000 jobs, in accordance with London Plan Policy SD1: Opportunity Areas. All Pimlico lies within the Central Activities Zone (CAZ) also defined in the London Plan. The main commercial areas within Pimlico include the Warwick Way/Tachbrook Street CAZ Retail Cluster, as delineated in the Westminster City Plan (‘the City Plan’). Policy 14 of the City Plan describes CAZ Retail Clusters as places which “provide further (outside Knightsbridge and the West End) large format retail and complementary town centre uses to meet the needs of residents, workers and visitors”. Shops, cafes and restaurants and office accommodation are provided in and adjacent to the Warwick Way/Tachbrook Street CAZ Retail Cluster. Retail and restaurant facilities are provided elsewhere, as illustrated on Map 3, notably in the Local Centres along Lupus Street, Moreton Street and around Pimlico station. Significant office space is also available in blocks near Pimlico station and above the shops in Wilton Road. Numerous hotels operate in Pimlico, notably along Belgrave Road

and St George's Drive, and there are schools and doctors' surgeries serving local residents.

- 1.5 Concerning transport, Vauxhall Bridge Road along the eastern edge of Pimlico forms part of Transport for London's strategic road network and connects areas north and south of the River Thames. As I saw at my site visit, it supports significant vehicle movements. Grosvenor Road and Belgrave Road are 'A' roads, but many of the roads in the Neighbourhood Plan area are relatively quiet, reflecting the fact that Pimlico is primarily residential, with many local facilities close to home. Also, Pimlico is well-served by public transport. The Plan observes that 80% of local residents travel to work by public transport, bicycle or on foot. Nevertheless, paragraph 30 of the Plan states that Pimlico residents are concerned about air quality and pollution from traffic on the roads.
- 1.6 The Pimlico Neighbourhood Forum was designated as a qualifying body in October 2015 by Westminster City Council (WCC). The designation was for five years, and re-designation was made on 30 November 2020 for a further 5 years. The Neighbourhood Area, as shown on Map 1 of the Pimlico Neighbourhood Plan, was designated by WCC in September 2013. Membership of the Forum was made available to all local residents, businesses and Councillors. The Forum held an initial meeting on 26 September 2016, attended by some 120 local residents. An initial steering group for neighbourhood plan preparation was then elected from members.

The Independent Examiner

- 1.7 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Pimlico Neighbourhood Plan by WCC, with the agreement of the Pimlico Neighbourhood Forum. I am a chartered town planner and former government Planning Inspector, with prior experience of examining neighbourhood plans within Westminster and elsewhere in England. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.8 As the independent examiner I am required to produce this report and recommend either:
 - (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

- 1.9 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
 - Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').
- 1.10 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.11 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan for the area;

- Be compatible with and not breach European Union (EU) obligations (under retained EU law);¹ and
- Meet prescribed conditions and comply with prescribed matters.

1.12 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.²

2. Approach to the Examination

Planning Policy Context

2.1 The Development Plan for this part of the City of Westminster, not including documents relating to excluded minerals and waste development, is the Westminster City Plan 2019-40, and the London Plan 2021.

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 20 July 2021, and all references in this report are to the July NPPF and its accompanying PPG.

Submitted Documents

2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted in 2021 which comprise:

- the Submission Stage Pimlico Neighbourhood Plan 2021-2040, [April 2021];
- Map 1 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
- the Consultation Statement, [May 2021];
- the Basic Conditions Statement, [May 2021];
- all the representations that have been made in accordance with the Regulation 16 consultation;
- the Habitats Regulations Assessment Screening Report, [April 2021]; and

¹ The existing body of environmental regulation is retained in UK law.

²This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

- the Strategic Environmental Assessment Screening Report [May 2021].³

2.4 After reading the above submitted documents, on 27 October 2021 I requested answers from the Forum to a number of preliminary questions and, if possible, a Statement of Common Ground (SOCG) with WCC. This SOCG was requested with a view to setting out areas of agreement on proposed modifications to the submitted plan. Following discussions with WCC officers, in February 2022 the Forum submitted a SOCG. This comprised, Section 1- Outstanding issues/Key disagreements between WCC and the Forum; Section 2 - Proposed modifications agreed between WCC and the Forum; and Section 3 – Other proposed modifications suggested by WCC. A table with additional evidence relating to Policy PIM17 and further evidence related to housing policies was also submitted. The Forum also responded to my preliminary questions 2-12 in a response dated 16 November 2021. I take account of all these documents in my examination of the Pimlico Neighbourhood Plan.⁴

Site Visit

2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 16 November 2021 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses, and answers to my preliminary questions described above, clearly articulated the objections to the Plan, and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

2.7 Where necessary, I have recommended modifications to the Pimlico Neighbourhood Plan (**PMs**) in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed and set out these modifications separately in Appendix 1. My list of PMs does not refer on an individual basis to each of the proposed modifications agreed between WCC and the Pimlico Neighbourhood Forum, set out in Section 2 of the SOCG which is attached as Appendix 2 to this report. However, I recommend, as a starting point, that all the proposed modifications in Section 2 should be made to the submitted Plan, to meet the Basic Conditions (**PM25**).

³ View at: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/pimlico-neighbourhood-plan/submitted-documents>

⁴ View at: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/pimlico-neighbourhood-plan/examination-documents>

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Pimlico Neighbourhood Plan has been prepared and submitted for examination by Pimlico Neighbourhood Forum, which is a qualifying body for an area that was designated by WCC in September 2013. The Pimlico Forum was designated as a qualifying body in October 2015 and was redesignated by WCC for a further five years on 30 November 2020.
- 3.2 It is the only neighbourhood plan for Pimlico and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2021 to 2040.

Neighbourhood Plan Preparation and Consultation

- 3.4 Following designation by WCC of the Forum and the Neighbourhood Plan Area in October 2015, an initial meeting in St Saviour's Hall, St George's Square, led to the establishment of a steering group. The steering group then met with neighbouring Forums who had prior experience in producing neighbourhood plans (notably for Fitzrovia West, Queen's Park, and Knightsbridge). The group proceeded to conduct an open-ended e-mail survey of the Federation of Pimlico Residents' Associations (FREDA) which comprises 18 residents' associations covering the Neighbourhood Plan Area. Residents' associations and local clergy were asked for their views on basic questions as to what people liked about living in Pimlico and what would make it better. Some 27 responses were received and were used to develop a potential vision for the future of Pimlico, which was the discussion point at the March 2017 AGM attended by more than 60 residents.
- 3.5 Exhibition and consultation events followed on 24 June 2017, 8 November 2017 and 17 November 2017 in venues across Pimlico. They led to the identification of issues for future planning on: commercial activity; heritage of the Conservation Areas; green and open spaces and access to the riverbank; housing; and the future of the Queen Mother Sports Centre. A brief document for further discussion was then prepared with input from locally based architects and surveyors to share with local residents, WCC and housing associations as well as other stakeholders, in Autumn 2018. A very early draft of the Neighbourhood Plan was shared with WCC before the Pre-submission Regulation 14 document was produced for public consultation between 31 July and 10 October 2019. A Pimlico Forum website was set up to aid consultation, and the Consultation Statement confirms in paragraphs 31 and 32 that a wide range of local residents, business interests, statutory bodies and neighbouring interest groups were consulted. Responses were received

from 8 statutory bodies, 9 amenity societies/residents' associations and 30 residents/business owners.

- 3.6 The Consultation Statement briefly summarises how the responses were used to modify the Neighbourhood Plan and produce the April 2021 Submission Stage (Regulation 16) Consultation Version, which is the subject of this examination. Public consultation on this Plan, from 28 June - 23 August 2021, yielded 21 responses from a range of organisations and individuals. These included criticism by a respondent that little attention had been paid to the southern part of Pimlico, and that some businesses may not have been consulted. I raised these concerns with the Forum in my letter of 27 October 2021 (question 10), and am satisfied by the Forum's response of 16 November 2021, that engagement was carried out across the community, and that Southern Pimlico is adequately covered by the Neighbourhood Plan. I would not expect every business or resident in the community to respond to consultation exercises, and am satisfied that the consultation process has met the legal requirements i.e. procedural compliance, and has had regard to the advice in the PPG on plan preparation.

Development and Use of Land

- 3.7 Providing that modification **PM11** is made to remove Policy PIM 9, for the reasons given in paragraph 4.30 and 4.31 of this report, the Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.8 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.9 The Basic Conditions Statement states that the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights. WCC has raised no objection to the Neighbourhood Plan on these grounds, and from my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA), as reported in the Screening Report, May 2021. This confirmed WCC's agreement that it was unnecessary to undertake SEA, as the Pimlico Neighbourhood Plan was not likely to have significant

environmental effects. Having read the Strategic Environmental Assessment Screening Report , I support this conclusion.

- 4.2 The Pimlico Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA), which also was not triggered. It was concluded that the Plan would have no significant effects on the Richmond Park and Wimbledon Common Special Conservation Areas, which are within 10kms of Pimlico. Both Natural England and WCC agreed with the assessment, and I support the conclusion that a full HRA need not be undertaken.

Main Issues

- 4.3 I have approached the assessment of compliance with the Basic Conditions of the Pimlico Neighbourhood Plan as two main matters:
- General issues of compliance of the Plan, as a whole; and
 - Specific issues of compliance of the Plan policies.

General Issues of Compliance

Chapter 1: Introduction and Vision

- 4.4 The Pimlico Neighbourhood Plan is a concise document of some 60 pages, supported by four Appendices with evidential data and a Glossary. The text of the Plan is supported by photographs which highlight some of Pimlico's most iconic features (for example, the Thomas Cubitt statue and artwork in Dolphin Square), its prevailing built form and layout, green infrastructure and human activity. In addition, there is a series of maps which should assist readers and users of the Plan. Chapter 1: Introduction and Vision explains the historical background for the area, informing readers that development in Pimlico took off in the middle of the nineteenth century. The Victoria railway line, Cubitt's grid of streets, social housing on Peabody Avenue, were all created in the nineteenth century and helped to shape the modern environment. Industrial land alongside the River Thames was redeveloped for housing in the first half of the twentieth century (for example Dolphin Square and the Tachbrook Estate), reinforcing the residential character of Pimlico. Post the second world war, building on bomb damaged sites took place, and some gentrification occurred albeit, the Neighbourhood Plan suggests, Pimlico experienced more fragmentation and deterioration of its streetscape than did nearby Belgravia.

- 4.5 The Pimlico Neighbourhood Plan reports that there were about 9,500 households and 17,500 usual residents in the area when the 2011 Census was undertaken. Consultation exercises for the Neighbourhood Plan revealed that residents like the "village" feel to Pimlico and this is at the heart of the Vision for the period to 2040, set out in paragraph 30, at the end of Chapter 1 of the Plan. ROK Planning on behalf of 4C Hotel Group contended that aiming "to maintain the quiet village atmosphere and its largely residential nature" would be contrary to the achievement of sustainable development in this part of Central London, and therefore

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inconsistent with the NPPF. The Vision, it is argued, is unduly prohibitive and will not allow for enhancement, redevelopment or improvement through new development. Pimlico is a densely urban and highly populated area, which should not be considered a “village” environment.

- 4.6 The NPPF, paragraphs 7-11, set out the presumption in favour of sustainable development, explaining that sustainable development has three objectives. In addition to building a strong, responsive and competitive economy, planning policies and development should support strong, vibrant and healthy communities and should contribute to protecting and enhancing the natural, built and historic environment. Bearing in mind that Pimlico is located within London’s CAZ, I recognise that the Neighbourhood Plan should not stifle future economic development. However, I consider that the Vision for Pimlico, with its substantial residential population, should also seek support for its local community. I recognise the need for Pimlico to balance the social and environmental objectives with economic ones. In addition, growth and change should not be detrimental to the four Conservation Areas and heritage assets in Pimlico. The Neighbourhood Plan is in general conformity with Policy GG1: Building strong and inclusive communities, in the London Plan 2021, in my view. WCC’s City Plan 2019-40, when addressing CAZ Retail Clusters, states in paragraphs 4.19 and 4.25 that the CAZ is home to many residential character areas, and future development must meet the needs of residents, workers and visitors as well as commercial interests. I conclude that the Vision is appropriate for Pimlico and satisfies the Basic Conditions for neighbourhood planning.
- 4.7 The various strands of the Vision have shaped the content of Chapters 2-6, with their policies for appropriate and high quality future development of the area. I am satisfied that the structure and content of Chapter 1 meet the Basic Conditions for neighbourhood planning and provide an informative introduction for readers and users.
- 4.8 Paragraph 2 of Chapter 1 advises readers that the Neighbourhood Plan, when made, will become part of Westminster’s Development Plan, and I support the proposed modification to this text, as set out in Section 2 of the SOCG, so that a precise and up-to-date description of the London Plan and City Plan is given. I have considered whether paragraph 2 should be extended to refer to development proposals outside but adjacent to the Neighbourhood Plan Area. In order to meet the legal requirements⁵, I agree with WCC that the Pimlico Neighbourhood Plan should not include policies for application to adjoining areas outside its boundary, and the proposed new sentence put forward by the Forum in Section 1 of the SOCG should not be added. However, the Regulation 16 response from CBRE Limited on behalf of Network Rail drew my attention to Pimlico’s proximity to the Victoria Opportunity Area, where Network Rail is working

⁵ Section 38A(2) of the 2004 Act requires neighbourhood plan policies to relate to the development and use of land in the whole or any part of the area specified in the plan. Section 38B(1)(c) states that a plan may not relate to more than one neighbourhood area.

with a number of partners including WCC and the Greater London Authority to produce a new concept masterplan for the area around and behind Victoria Station. CBRE Limited stated that Policy PIM 11: Tall buildings and Policies PIM 13-15: Housing Development in the Pimlico Neighbourhood Plan could have implications for the Victoria Masterplan. Modifications to both these policies are proposed later in this report, and I am satisfied that the modified policies should not prevent appropriate development in the wider area, including the Victoria Opportunity Area. I propose that paragraph 2 of Chapter 1 is extended to acknowledge the emerging "Future Victoria" concept masterplan, so that the planning context of Pimlico is described more fully. In addition, I propose that the Forum should monitor progress on the masterplan and consider its likely future implications for Pimlico. **PM1** should be made so that the Plan is in general conformity with strategic policy in the London Plan and City Plan. With **PM1** and the relevant modifications proposed in Section 2 of the SOCG, I conclude that Chapter 1 of the Pimlico Neighbourhood Plan provides a robust Introduction and Vision and meets the Basic Conditions for neighbourhood planning.

- 4.9 Chapters 2–6 address the various aspects of the Vision, beginning with commercial and mixed use centres, and setting out policies to govern future development. All these policies are assessed below in the section on specific issues of compliance, and I am satisfied that, overall and with the proposed modifications being made, appropriate coverage is given to each. Four Appendices are then included which provide detailed evidential information in support of the Plan's policies, beginning with Building Heights. The other Appendices address Commercial areas/retail frontages, Additional unlisted buildings of merit and locally designated heritage assets, and Open and green spaces. I propose some modifications to the content of the Appendices, for reasons given in subsequent paragraphs of my report, so that they support the Plan's policies effectively and include the best available evidence. However, overall, I consider that these Appendices assist understanding of the potential challenges for Pimlico and should contribute to the achievement of sustainable development.

Specific Issues of Compliance of the Plan Policies

[Chapter 2: Delivering a vibrant commercial sector to support our area](#)

- 4.10 Chapter 2: Delivering a vibrant commercial sector supporting our area is a good starting point for policy development, in my view, especially as Pimlico is located within Central London and the CAZ. The Policies Map on Page 11 shows policy designations for streets and areas but is difficult to negotiate in its current form. WCC advised, in Section 3 of the SOCG, that its officers could work with the Forum to produce a clearer map and a new key, which would reference the distinctions between City Plan and Forum designations. I recommend that the map and its key are revised accordingly, as in **PM1**, to assist readers and users of the Plan, and to contribute to the achievement of sustainable development.

- 4.11 Policy PIM 1 begins with a reference to the Policies Map (Map 2) but omits to mention Map 3 – Retail areas. I consider that PIM 1 should direct readers to Map 3 which sets out the hierarchy for town centres with retail facilities, as proposed in **PM2**, to aid the achievement of sustainable development. WCC commented that Policy PIM 1 should better reflect what can be controlled through planning applications, in light of recent changes to the Use Classes Order, which give more flexibility for change of use.⁶ Section 2 of the SOCG shows agreed wording changes to paragraphs PIM 1 A, B, C, D and F, which I support. The changes to A and B should meet in principle the requests of local people, made in the responses to the Regulation 16 consultation exercise, for less through traffic and pollution in town centres/retail areas, and an improved public realm, especially in Warwick Way and Wilton Road (which form a part of the Warwick Way/Tachbrook Street retail cluster). WCC argued that PIM 1 E was too restrictive and could undermine the viability of some businesses. The Forum pointed out that some commercial units in Pimlico’s Local Centres and parades are in close proximity to residential properties, which would be susceptible to harmful noise effects from late night or early morning activity. Section 1 of the SOCG includes a proposed change of wording from WCC, which would soften the policy approach but enable planning conditions to control hours of operation where necessary. I support this change of wording as in **PM2**, to secure sustainable development and for general conformity with the City Plan’s Policies 13-16.
- 4.12 PIM 1 G seeks to retain existing uses in retail centres and requires marketing for not less than 18 months before a change of use will be permitted. This was criticised by WCC as being ambiguous and too onerous, in expecting applicants to market the units for alternative uses. The policy, it was argued, could inadvertently promote conversions to residential which would be contrary to the City Plan, and inappropriate for commercial frontages. I consider that City Plan Policies 13 – Supporting economic growth, 14 – Town centres, high streets and the CAZ, and 16 – Food, drink and entertainment should provide reasonable protection against the loss of main town centre uses to residential in Pimlico. I have taken account of the Forum’s proposed rewording in Section 1 of the SOCG but consider that this would not overcome WCC’s objection to be absence of general conformity with the strategic London Plan and City Plan. Paragraph G of PIM 1 should be deleted as in **PM2**.
- 4.13 There was agreement between WCC and the Forum that paragraph H should be moved within Policy PIM 1 so that it follows F under the heading “Heritage Impacts”. I support this re-location. In **PM2**, I recommend that paragraph H sits under “Heritage Impacts” for clarity and refers to proposals “within the town centre hierarchy” for general conformity with the strategic planning policy of the City Plan. I also agree to retention of

⁶ Use Classes Order – changes introduced in September 2020, including new Class E, which encompasses commercial, business and service uses.

the reference to “frosted or otherwise opaque glass”, because “as far as possible” in the preceding sentence should provide some flexibility.

- 4.14 Section 3 of the SOCG lists a number of possible changes to the supporting text and Map 3 in Chapter 2, where there is disagreement between the Forum and WCC. I consider that paragraphs 4 and 16 should include references to the Town Centre Health Checks (2019) carried out by WCC for the CAZ Retail Cluster. Also, Map 3 should refer to the Town centre hierarchy as in the City Plan, rather than Retail areas, and paragraphs 6 and 7 should use “designate” instead of “define”. These changes are needed for general conformity with strategic planning policy, and having regard for national planning policy, notably paragraph 16d) of the NPPF. These modifications would be secured by **PM3**.
- 4.15 Whilst I agree with WCC that paragraph 15 does not reflect a positive image of the retail sector, it seems appropriate for the Neighbourhood Plan to identify trends such as shop closures, the expansion of charity shops and the lack of independent clothes, butchers and book shops. I consider it unnecessary to reference the sources of the information given. However, paragraph 16, in my opinion, should present a more ambitious view of the future for Pimlico’s town/retail centres, given the significant increase in population since 2001, and the presence of visitors to this part of Central London. I consider that the proposed change to paragraph 16, put forward by WCC in Section 3 of the SOCG, including the reference to WCC’s 2018-2019 Town Centre Health Checks (rather than the more dated 2013 Healthcheck), should be made to contribute to the achievement of sustainable development. This would be secured through **PM3**.
- 4.16 Paragraph 17 in Chapter 2 should be modified so that it reflects the town centre hierarchy of Pimlico more precisely. WCC put forward revised wording in Section 1 of the SOCG which I support, as it would align the Neighbourhood Plan better with Policy 14 of WCC’s City Plan. However, the Forum has pointed out that much of the CAZ retail cluster fronts historic streets in the Conservation Area, where large format retail and town centre uses would be inappropriate. I have therefore modified the wording proposed by WCC so that regard is had for national planning policy regarding heritage. **PM3** includes revised text for paragraph 17 and should be made. I consider that paragraph 20 should refer to visitors, as well as local residents and workers, as suggested by WCC, but I agree with the Forum that this paragraph should recognise that the CAZ retail cluster includes or is adjacent to many residential properties. Paragraph 20 should be modified as shown in **PM3**.
- 4.17 WCC stated that paragraph 25 in Chapter 2 was “unclear and ambiguous as to where offices would be encouraged”, and proposed changes to paragraphs 24 and 25. It seems to me that paragraphs 24 and 25 give suitably clear information as to where office development in the CAZ retail cluster would be preferred, and I consider that changes to the text are not needed.

- 4.18 Paragraph 32 in Chapter 2 is seen by WCC as too onerous because it could be interpreted as a ban on all uses except residential in many parts of Pimlico. I consider that this would be out of general conformity with strategic policies for the CAZ and support the proposed modification to this text put forward by WCC in Section 1 of the SOCG. In addition, the heading to paragraph 32 should refer to the "CAZ Retail Cluster" and not the "Core Retail Cluster". Modified wording of paragraph 32 is included in **PM3**, which should be made so that the Basic Conditions for neighbourhood planning are met.

[Chapter 3: Design and Heritage](#)

- 4.19 Chapter 3: Design and Heritage begins with an Introduction which explains that Pimlico contains four Conservation Areas and many listed buildings. It describes key features of different parts of the Neighbourhood Plan Area – eg. prevailing building heights, layout, scale, styles and fabrics. Paragraph 1 refers to a map showing the Conservation Areas, and I recommend that this should refer to Map 4 for clarity, as in **PM4**. Modifications to the Introduction agreed by WCC and the Forum, and shown in Section 2 of the SOCG, helpfully confirm that Conservation Area Audits have been published by WCC. It is also agreed to modify the description of the CAZ Retail Cluster around Warwick Way and Wilton Road in paragraph 9 of the Introduction. I support these modifications, which should contribute to sustainable development and give general conformity with strategic planning policies.
- 4.20 Policy PIM 2 relates to Pimlico Conservation Area. In Section 1 of the SOCG, WCC proposed that the policy should seek to "preserve" rather than "respect" the townscape and views, which would better reflect the wording of national planning policy. In addition, WCC seeks removal of the reference to the openness of skies, with which the Forum disagrees. I note that ROK Planning on behalf of 4C Hotel Group objected to the second sentence of Policy PIM 2, describing it as too prescriptive and not reflecting different sites and visual contexts within Pimlico. I consider that the concept of "regard for the openness of skies" is vague, and the list of streets and views without descriptions as to what is special in each case could be too restrictive. The modifications proposed by WCC should be made to Policy PIM 2, and the Forum's observation in respect of building heights and a canyon effect should be moved to paragraph 14 of the supporting text. Policy PIM 2 should also refer to "map 5" rather than the "policy map", and Map 5 should have a modified key to replace "protected views" with "streets where the impact of development on views along and upwards should be assessed". The streets and views and listed townscapes in Policy PIM 2 should be deleted from the policy and placed alongside Map 5. **PM5** should be made to include these modifications so that Policy PIM 2 provides clarity, and has regard for national planning policy, and contributes to the achievement of sustainable development.
- 4.21 Policy PIM 3: Upward extensions in the Pimlico Conservation Area was criticised by WCC as too restrictive, and focusing too much on mansards,

without sufficient regard to protecting listed buildings. Agreed wording to Policy PIM 3 A, set out in SOCG Section 2, would simplify the references to mansard roofs and add a reference to listed buildings. I support these modifications, as well as the agreed modifications to paragraphs 2-21 to refer to the Pimlico Conservation Area Audit rather than the Pimlico Design Guide, and to highlight the importance of trees in the Conservation Area, among other things. The last sentence in PIM 3 A, referring to the Pimlico Design Guide should be removed, but a cross-reference should be added to Appendix 1: Building heights and upward extensions. In addition, for clarity, the text headed "Non-Policy Guidance: PDG Roof Extension Principles" at the end of Policy PIM 3 should be re-located to Appendix 1, with some additional wording, as shown in **PM6**, to describe its status.

- 4.22 Section 1 of the SOCG indicates that there is a difference of opinion between WCC and the Forum over Policy PIM 3 B. WCC argues that the approach to mansard storey development is too prescriptive and not in accordance with City Plan Policies 39 & 40. Strategic Policy 39 in the City Plan: Westminster's heritage - requires applicants for development to fully assess the likely impact of their proposals in advance. I note that paragraph 39.14 requires consideration of the effect on Conservation Areas and their settings. Applications should demonstrate a full understanding of the significance of the area and a positive contribution to character and appearance in terms of buildings, landmarks, views, trees etc. The City Plan's Policy 40: Townscape and Architecture requires development to be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, among other things. Roof extensions and Westminster views are addressed in Policy 40, and Policy 41 concerns Building height. I agree with WCC that PIM 3 B is complex and lacks clear justification and consider that the City Plan policies should give substantive protection against the harmful development of mansards.
- 4.23 The Forum is concerned that previous planning decisions have not followed the guidance in the Pimlico Conservation Area Audit and have permitted upward development which the Audit indicated would be unacceptable. However, I note that City Plan 2019-40 is a new, recently adopted plan (April 2021) with detailed and firm policies for roof extensions and uniformity. I therefore propose that PIM 3 B is deleted and a new clause e) be added to PIM 3 A concerning single storey mansard extensions, as put forward by WCC in Section 1 of the SOCG. I have taken account of the Forum's misgivings over Policy 40 E 2 of the City Plan, but this is part of the adopted planning framework. I conclude that **PM6** to modify Policy PIM 3 should be made. The modification should enable applications to be considered individually on a case-by-case basis, which should contribute to the achievement of sustainable development in general conformity with City Plan Policies 39-41.
- 4.24 Section 3 of the SOCG explains differing opinions about paragraph 24 which follows Policy PIM 3. I consider that reference to the "liberalisation

of existing policy” is debateable and emotive. However, a reference to potential for increasing the local housing stock whilst retaining an attractive roofline seems entirely appropriate. I put forward revised text in **PM6** to cover this point and contribute to the achievement of sustainable development.

- 4.25 Policy PIM 4: Design in the Pimlico Conservation Area was supported in principle by WCC at the Regulation 16 consultation stage, although it was argued that the policy should have regard to the need to preserve listed buildings and other heritage features such as shopfronts. Section 2 of the SOCG includes agreed modifications to clauses A, F and G of PIM 4 which address these concerns. I consider that these modifications which have regard for national planning policy on protecting heritage should be made. The Forum proposed that the label on Page 26 should include a cross reference to Policy PIM 4 B. I agree that this should be added, as in **PM7**, so that regard is had for paragraph 16 of the NPPF. The Forum advised that PIM 4 C is “a direct quote from paragraph 4.15” of the Pimlico Conservation Area Audit, and I agree with the Forum that this could be referenced at the end of Policy PIM 4. I propose that a reference should replace paragraph 25, which reads to me as an unhelpful comment on earlier planning decisions. Paragraph 25 should be modified, as in **PM7**, to refer to the Conservation Area Audit and provide clarity for readers as sought in paragraph 16 of the NPPF.
- 4.26 Policy PIM 4 E seems ambiguous to me, as demonstrating “a high quality of design” could be interpreted in different ways. Paragraph 26 of the Plan points out that the conversion of shops to residential use can create a deadening effect to the frontage and it favours a different design approach (from installing opaque or reflective glass in old shopfronts). WCC put forward modified wording as shown in Section 1 of the SOCG, with which the Forum did not agree. However, in order to secure general conformity with City Plan Policy 40: Townscape and architecture, I propose that modification to clause E be made, as put forward by WCC, and as shown in **PM7**. I note the difference of opinion between WCC and the Forum over clause I, on projecting porches over external basement doors. It seems to me that the wording is clear in stating that such development is usually unacceptable but may be permissible in exceptional circumstances. The clause gives appropriate flexibility to the decision-maker and need not be modified.
- 4.27 Agreement was reached between WCC and the Forum to change the heading to PIM 5, so that it refers to Peabody Avenue Conservation Area and requires development proposals to preserve and enhance the character of the Conservation Area. WCC contended that the last sentence of the policy should be deleted as it could be overly restrictive and relate to development outside as well as within the Conservation Area; it could also conflict with Policy PIM 11 of the Neighbourhood Plan. The Forum agreed to its deletion, providing that the reference heights in Policy PIM 11 are retained. I note that modifications to paragraphs 32

and 33 were agreed and included in Section 2 of the SOCG. I recommend that the last sentence of PIM 5 is removed, as in **PM8**, for clarity.

- 4.28 Policies PIM 6 and PIM 7 relate to Lillington and Longmore Gardens Conservation Area and Dolphin Square. Providing the modifications contained in Section 2 of the SOCG are made, I am satisfied that these policies meet the Basic Conditions for neighbourhood planning. However, I consider that paragraph 42 should be modified, and comment on the type of housing accommodation which would be acceptable in Dolphin Square should be left to Chapter 4 of the Neighbourhood Plan. **PM9** should be made to achieve sustainable development and for general conformity with Westminster's housing policy. Section 2 of the SOCG also proposes a changed title for Policy PIM 8, so that it covers "Additional unlisted buildings and structures of merit". I support this modification and the added reference to Policy 39 of the City Plan, which will give general conformity with the City Plan.
- 4.29 WCC proposed changes to paragraph 43 to provide additional information as to when phone boxes could be removed without planning permission. It noted that Appendix 3 did not include a photograph of the red phone boxes proposed for inclusion as non-designated heritage assets. I agree with the Forum that the proposed additional text would be lengthy, but it provides a full account of the current situation. I therefore support the provision of information in paragraph 43 regarding relevant planning procedures, along with an additional photograph in Appendix 3, as set out in **PM10**. I appreciate that this new Pimlico Neighbourhood Plan has included a detailed assessment of local heritage assets and is able to update or supplement the existing Conservation Area Audits. However, I consider that the negative statement in the third sentence of paragraph 43 about the Audits is unhelpful to the pursuit of sustainable development and should be deleted.
- 4.30 Regarding PIM 9: Design Review Panel, WCC objects to the policy, guidance and reasoned justification as they do not relate to land use matters. The PPG on Neighbourhood Planning (paragraph 004) makes clear that the role of neighbourhood plans is to provide plans relating to the use and development of land, and supporting wider strategic policy objectives which will be used for determining planning applications in the neighbourhood area. PIM 9 requiring WCC to change its planning processes and procedures goes beyond these powers and does not therefore meet the Basic Conditions for neighbourhood planning. WCC advises that it has a Design, Conservation and Sustainability team which works alongside planning officers, and provides expert advice at pre-application stage onwards in the decision-making process for planning applications. WCC has previously considered the use of design review panels but has ruled them out. Whilst the London Plan Policy D4 recognises that design review panels can be useful for independent scrutiny, it does not require them as necessary. Clause D of the London Plan policy states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design and

conservation officers. Development proposals referable to the London Mayor must have undergone at least one design review early in their preparation, but the Pimlico Neighbourhood Plan need not repeat this requirement.⁷

- 4.31 The development control system enables the Forum as well as local residents and stakeholders, to comment on all planning applications and read/see all the submitted supporting material. Although the Forum proposed some modifications to Policy PIM 9 in Section 1 of the SOCG, I consider that they do not overcome the objection that this policy would be interfering with the practice and processes of the local planning authority. The Forum clearly has concerns about the effect of future development on the village feel to Pimlico, arguing that there has been a “history of unattractive and jarring developments”. However, the new London Plan and City Plan contain strong policies to secure high quality design in the future. I conclude that Policy PIM 9 does not meet the Basic Conditions, in particular it does not have regard for national planning policy on neighbourhood plans. Policy PIM 9, paragraphs 44-51 and the Non-Policy Guidance, described on Page 36, should be deleted, in accordance with **PM11**.
- 4.32 Section 2 of the SOCG includes agreed changes to the wording for Policy PIM 10: Shopfronts and Signage (including Hotels) which I support to meet the Basic Conditions. Having regard for concerns raised by ROK Planning, I am satisfied that the modified wording of PIM 10 b should enable developers and decision-makers to assess appropriately any impact on original architectural detail. Section 3 of the SOCG sets out proposed changes to PIM 10 c to make it less prescriptive, and move details, eg. compliance with latest British Standards for energy efficiency, to the reasoned justification. I consider that the revised wording put forward by WCC would satisfactorily describe the types of lighting which cause problems to the character of the area. **PM12** should be made, so that regard is had for paragraph 16 of the NPPF. In addition, I raised questions about Policy PIM 10 (see question 8 of my letter to the Forum of 27 October 2021), stemming from objections to the policy made by ROK Planning. The Forum’s response, 16 November 2021, put forward a modification to the first sentence of Policy PIM 10, which I have included in **PM12** for clarity having regard for national planning policy.
- 4.33 ROK Planning, and Montagu Evans on behalf of Vitcorp Ltd objected to Policy PIM 11, arguing that the approach to Tall Buildings was too restrictive and not in general conformity with Policy 41 of the City Plan or Policy D9 of the London Plan. WCC pointed out that Tall Buildings are described differently in the London Plan and Westminster City Plan than is implied in Policy PIM 11 of the Pimlico Neighbourhood Plan. In Section 2 of the SOCG, there is agreement that the title of the policy should be changed from Tall buildings to Building Height. I consider that this

⁷ NPPF, paragraph 16 f).

modification is needed to achieve general conformity with the London Plan and City Plan and their policies for Tall Buildings.

- 4.34 The policy defines reference heights for different parts of Pimlico, and the supporting text refers to the illustrations in Appendix 1 which provide evidence of the low-rise nature of Pimlico. The Forum advised that Policy PIM 11 had been developed in consultation with Historic England, and I appreciate from my site visit that Pimlico contrasts with many other parts of Central London where tall buildings are more prevalent, if not dominant. ROK Planning advised that the Westminster Buildings Height Study (2019), an evidence document which backs the City Plan 2019-40, did not identify Pimlico as one of the areas suitable for tall buildings. The Forum has put forward modifications to Policy PIM 11 to remove references to “tall buildings” and relocate the description of reference heights to the reasoned justification. It has confirmed that the illustrations in Appendix 1 are based on OS data at February 2020. However, I propose modifications to the title of Map 9 as in **PM13** to clarify that Map 9 relates to the Pimlico Neighbourhood Plan Area and not the Conservation Area, and to state that it shows the different average heights of buildings. I also recommend further modification of the Forum’s proposed change to Policy PIM 11 clause B and the supporting text, to clarify the wording and aid planning officers’ decision making. I consider that the modified policy, with new paragraphs 52-55 and amended Map 9, as set out in **PM13**, should be retained in the Neighbourhood Plan, so that the character of Pimlico with its Conservation Areas and listed buildings is protected. Then the Plan will be in general conformity with strategic policy and contribute to the achievement of sustainable development.
- 4.35 Section 2 of the SOCG includes agreed modifications to Policy PIM 12 and Map 6, which will ensure that the Plan has regard for national planning policy to preserve or enhance the character and appearance of Conservation Areas, and take account of unlisted buildings and structures of merit. As long as the agreed modifications, and modifications proposed in **PMs 4-13** are made, I conclude that the policies in Chapter 3 will meet the Basic Conditions.

[Chapter 4: Housing and Hotels](#)

- 4.36 Chapter 4: Housing and Hotels begins by describing the population and household numbers in Pimlico, and the housing structure eg. almost 80% of homes have 2 bedrooms or fewer. Concerns raised by residents about housing provision are summarised, beginning with difficulties for growing families trying to stay in Pimlico due to the lack of/price of family-sized homes. The recent increase in very short term or holiday lets in the area, acting against the preferences of local people for a more stable and rooted community, is described. Due to its proximity to Victoria station, however, it is recognised that Pimlico has long had many small hotels serving visitors to London.

- 4.37 Section 2 of the SOCG sets out agreed modifications to the title of PIM 13, so that it addresses “Residential conversions and extensions”, and modifications to clause A, both of which I support. WCC objected to clause B of Policy PIM 13 as being contrary to Policy 8A of the City Plan, which seeks the provision of new homes through upward extensions, and reflects up-to-date evidence showing that Westminster needs new housing of all sizes. The Forum contends that the housing stock in Pimlico does not enable growing families to move to housing with additional bedrooms, resulting in a lower percentage of children at each age band in Pimlico, compared with Westminster as a whole. The Forum submitted a paper, Housing Stock Issues in Pimlico: Moving up and down the Housing Ladder, which provides area-based evidence to support clause B, albeit it does not post-date the 2011 Census. The paper also refers to information from a local estate agent which confirms the Forum’s view that there is very little housing stock on one level, suitable for elderly people wishing to downsize from family-sized properties in Pimlico.
- 4.38 Whilst Policy PIM 13 B must be in general conformity with Policy 8A of the City Plan and not stifle the provision of much-needed new housing of all types, I appreciate the Forum’s aim to encourage development which benefits Pimlico’s residents and their specific housing needs. I therefore propose modified wording of clause B so that it favours, but does not demand, the provision of mansards or roof extensions combined with the existing unit below to produce a family-sized dwelling. I recommend modification to paragraph 8, to confirm that all conversions and extensions to the housing stock should be of high quality, not “attractive enough to longer term residents”. Paragraph 9 should also be modified, to make clear that the provision of new housing as well as house extensions will not be ruled out. **PM14** should be made to achieve general conformity with the City Plan, and to contribute to sustainable development.
- 4.39 Section 2 of the SOCG shows agreed changes to Policy PIM 14, including a new title “New housing”, with modified wording to paragraphs 10 and 11, which I support as necessary to meet the Basic Conditions. Section 1 of the SOCG indicates that WCC and the Forum disagree about the wording of clause B. I consider that WCC’s proposed wording, requiring new homes to be accessible and adaptable or adapted for wheelchair users should mean that new homes would be suitable for elderly people. Clause B should be modified as in **PM15** so that Policy PIM 14 will contribute to sustainable development.
- 4.40 I appreciate the desire of the Forum to secure affordable housing for people living in Pimlico, and to prioritise intermediate housing for key workers with local connections. However, as WCC points out, planning policy does not enable housing to be directed to specific groups (such as intermediate housing for key workers) in a neighbourhood plan area. It is for a Council as housing authority rather than the planning authority to decide how affordable homes are allocated. Policy PIM 15 conflicts with Policies 8, 9 and 10 of the City Plan, which, as WCC points out, are based

on robust evidence of acute need for social and intermediate housing across Westminster. In addition, Policy 9G states that the mix and size of affordable housing will be determined by identified need within the Council's Annual Affordable Housing Statement. I therefore support the modifications to Policy PIM 15 and the supporting text in paragraphs 15 and 16, as proposed by WCC in Section 1 of the SOCG. Having regard for national planning policy and for general conformity with the City Plan, the modifications in **PM16** should be made.

- 4.41 Policy PIM 16: Hotels and short term let properties is followed by reasoned justification in paragraphs 17-21. I support the modified wording of Policy PIM 16, clauses A-D, included in Section 2 of the SOCG, to meet the Basic Conditions for neighbourhood planning. Paragraph 20 was said by WCC to be slightly contradictory with the policy, which discourages new hotels in residential areas. ROK Planning objected on the grounds that the policy was unduly prohibitive of new hotel development in Pimlico, and not in general conformity with Policy 15 of the Westminster City Plan. I consider that the reasoned justification for Policy PIM 16 should state more clearly where new hotel development might be acceptable, with reference to the town centre hierarchy. I recommend that the wording put forward by both the Forum and WCC in Section 1 of the SOCG, should be included in paragraph 20 of the Neighbourhood Plan, as in **PM17** for clarification.
- 4.42 Paragraph 21 suggests that some housing development in practice operates as hotels, often with relatively short-term lets. WCC suggested that paragraph 21 could include a cross-reference to Policy 8 of the City Plan and its reasoned justification. As housing delivery of a high quality in the right locations which meets identified need is a complex matter, I agree that readers and users of the Plan should be directed to the City Plan, and propose that paragraph 21 of the Neighbourhood Plan is modified, having regard for paragraph 16 of the NPPF. Paragraph 18 refers to streets which are "almost entirely residential", then "have a predominantly residential character", are "substantially residential or close to residential properties". The wording should be modified, in my opinion, to provide clarity for Plan readers and use, and to contribute to sustainable development. **PM17** includes all these modifications to Policy PIM 16 and paragraphs 18,20 and 21, and should be made so that the Plan will contribute to the achievement of sustainable development and be in general conformity with the City Plan.
- 4.43 Providing the agreed modifications, and modifications proposed in **PMs 14-17** are made, the policies in Chapter 4 will meet the Basic Conditions.

[Chapter 5: Open spaces, pedestrian and transport facilities, protecting the environment](#)

- 4.44 Policy PIM 17 seeks to protect and maintain Local Green Spaces (LGSs). The NPPF enables neighbourhood plans to designate land as LGS, subject to conditions described in its paragraphs 101 & 102. WCC pointed out

that almost all the named spaces in Policy PIM 17 are already afforded protection as being Registered Historic Parks, London Squares and/or Conservation Areas, as well as being identified as open space in City Plan strategic Policy 32. The NPPF indicates that the designation should be used only when specific conditions are satisfied, and the PPG⁸ advises that, if land is already protected by designations which offer protection, such as conservation areas, consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

- 4.45 All the proposed LGSs in Pimlico, except for Bessborough Gardens, are within Conservation Areas. The latter have protection from the Register of Historic Parks and Gardens, or the London Squares Preservation Act.
- 4.46 WCC queried whether landowners were consulted on the proposed LGS designation sufficiently early. The Forum advised that consultation was carried out at Regulation 14 stage, and subsequently in respect of private gardens at Eccleston Square and Warwick Square. The Table submitted in response to my preliminary questions provides comments by WCC and the Forum in relation to PIM 17 and confirms that all relevant owners were consulted. I have seen no objections to the proposed LGS designations from landowners.
- 4.47 On my site visit, I saw all the proposed LGSs and can understand their importance to the local community in this part of Westminster, especially as many homes lack gardens or private open space. Even the private spaces at Eccleston Square and Warwick Square contribute visually to a quiet and green environment for neighbouring residents and people walking past. In combination, I consider that all the spaces provide green areas which contribute significantly to the character of Pimlico. The areas are all close to the communities they serve and are not extensive tracts of land. However, having regard for national planning policy and the PPG, I consider that as these spaces are already afforded protection, no additional local benefit would accrue if they were designated as LGS. Accordingly, I propose modifications to Policy PIM 17, so that the LGS designation is removed and replaced with a reference to Green squares and gardens. The supporting text and Appendix 4 should also be modified to refer to the Green squares and gardens, rather than LGSs, but to acknowledge that they have importance to their local communities. The key to Map 7 should be modified, as in Section 2 of the SOCG, and to refer to the places marked green as Green squares and gardens. Policy PIM 17 should also be modified to refer to Map 7 instead of the Policies Map. **PM18** should be made so that regard is had for national planning policy, and so that the Plan contributes to the achievement of sustainable development.
- 4.48 Policies PIM 18 and PIM 19 seek the preservation of open spaces and enhancement of the public realm, with space favouring pedestrians over

⁸ PPG Reference ID: 37-011-20140306.

vehicles. Section 2 of the SOCG sets out some agreed modifications to these policies, which I support in order to meet the Basic Conditions. Transport for London (TfL) expressed disappointment that the Neighbourhood Plan makes no reference to the Mayor of London's Healthy Streets Approach, Vision Zero or the targets to increase active travel and use of public travel while reducing car journeys. However, TfL expressed its support for Policies PIM 19 and PIM 22 of the Pimlico Neighbourhood Plan. The Forum questioned why the Plan should repeat strategic policy, but in its letter to me dated 16 November 2021, made reference to Policies T2 and T6 of the London Plan on car parking standards and healthy streets. I consider that, having regard for national planning policy and to demonstrate general conformity with the London Plan, the Neighbourhood Plan should refer to the Mayor of London's Healthy Streets approach, and targets to increase active travel and public transport usage, as in **PM19**. The Forum agreed that the supporting text to Policy PIM 19 could be modified to state that Vauxhall Bridge Road forms part of TfL's Road Network. Paragraph 15, following Policy PIM 19, should be modified as shown in **PM19**, so that regard is had for national planning and transport policy.

- 4.49 Policies PIM 20 and 21: Crossings from Nine Elms to Pimlico and Riverside activities arguably address in part the concerns of a respondent that the southern part of Pimlico merits more attention. Section 2 of the SOCG includes agreed modifications to the title and first bullet point of Policy PIM 20, which have my support and should be made, should give clarity and have regard for paragraph 16 of the NPPF. Section 3 of the SOCG indicates some disagreement between WCC and the Forum over bullet points 4 and 5 of Policy PIM 20. I note the consultation response from a respondent that the Plan acknowledges the potential negative impacts of the proposed Nine Elms pedestrian bridge, but not its potential benefits. I agree with WCC that the policy wording could be read to imply that more people walking and cycling through Pimlico would be a problem, contrary to City Plan Policy 25, which seeks to prioritise walking and cycling in the city. I also accept that it could be difficult to manage pedestrian and cycling movements as Policy PIM 20 states. I therefore propose that PIM 20 is modified as suggested by WCC in Section 3 of the SOCG, for general conformity with the City Plan and so that the Plan contributes to sustainable development. For similar reasons, PIM 20 should include a reference to the achievement of high environmental standards, as requested by Clean Air in London and as written in the Forum's reply of 16 November 2021 to my preliminary questions. **PM19** should be made, accordingly.
- 4.50 Section 2 of the SOCG includes modifications to Policy PIM 21 A-B which have my support, and should be made. Clean Air in London also suggested that Policy PIM 21: Riverside activities should encourage high environmental standards, and I recommend that the modification put forward by the Forum in its letter to me of 16 November 2021 should be made. The Port of London Authority welcomed the specific river-related policies in the Pimlico Neighbourhood Plan and expressed support for a

future continuous riverside walk along the northern bank of the Thames. It requested a reference in Policy PIM 21 to its document "A Safer Riverside Guidance", so that appropriate riparian life-saving infrastructure be considered when development proposals are put forward. I recommend that the Guidance is referenced within Policy PIM 21. **PM20** should be made, to include the above modifications and secure sustainable development.

- 4.51 Policy PIM 22: Wilton Road/Warwick Way public realm, should enhance the CAZ Retail Cluster and make it a more attractive destination for shoppers and visitors. I strongly support the aims of the policy and consider that its delivery should address some of the issues identified by a respondent to the Regulation 16 consultation exercise. Paragraphs 25–29 of the Plan identify specific local problems and steps which would improve matters, and in principle these should drive implementation of the policy. The Forum advises that these are creative ideas which have come from the local community. Small modifications to A and B of Policy PIM 22 were agreed and set out in Section 2 of the SOCG, which I support. In Section 3 of the SOCG, WCC proposed some modifications to the text, to remove reference to how schemes should be funded, to recognise that parking is a strategic planning matter and add a reference to parking for disabled people. Although the Forum did not agree in full with these modifications, in order to achieve sustainable development and having regard for national planning policy, I recommend that paragraph 27 is modified as shown in **PM21**.
- 4.52 Policy PIM 23: Renewable energy and air quality begins by stating that all development should aim to achieve zero local emissions and not lead to further deterioration of poor air quality. Section 1 of the SOCG indicates that WCC had some concerns with the policy, stating that it was contrary to City Plan Policies 32 and 36, and to London Plan Policies SI 1 & 2. I consider that these overarching strategic policies provide a range of requirements for developers, which are designed to meet the Mayor's aim for London to become a zero-carbon city by 2050. The Neighbourhood Plan should briefly explain the context for its Policy PIM 23, to contribute to the achievement of sustainable development. The reasoned justification to Policy PIM 23 of the Pimlico Neighbourhood Plan should be modified, so that it includes reference to the strategic policies, in my view. A definition of Zero local emissions should be added to the Neighbourhood Plan's glossary and referenced in the reasoned justification. **PM22** should be made so that the Plan contributes to sustainable development.
- 4.53 A respondent to the Regulation 16 consultation was critical that the Pimlico Neighbourhood Plan does not aim for carbon neutrality. By contrast, Clean Air in London described Policy PIM 23 as "excellent", although they requested some additions to the policy. I consider that it is unnecessary for the Pimlico Neighbourhood Plan to refer to other made neighbourhood plans. Regarding the Pimlico local heat network, the Forum indicated no specific new wording but observed its support for the City Plan's target for Westminster to be net zero carbon by 2040. I

recommend no change to clause A of Policy PIM 23 but consider that the glossary and reasoned justification be extended as described below.

- 4.54 I recommend that the modifications to clauses B-F of Policy PIM 23, put forward by WCC in Section 1 of the SOCG, are necessary to give clarity to readers and users of the Plan having regard for the NPPF's paragraph 16, and to achieve general conformity with policy in the City Plan and London Plan. Paragraph 30 should be expanded to refer to the definition of Zero local emissions proposed by the Forum, and to add cross-references to the London Plan's Chapter 9: Sustainable infrastructure, and the City Plan's Policies 32: Air Quality and 36: Energy. **PM22** should be made accordingly. I conclude that the policies in Chapter 5 will meet the Basic Conditions for neighbourhood planning, as long as **PMs 18-22** are made.

Chapter 6: Larger Sites including the Queen Mother Sports Centre Block

- 4.55 Chapter 6 concerns Larger Sites including the Queen Mother Sports Centre Block. Policy PIM 24 sets out the key principles which major development proposals in Pimlico should follow, focusing on the Queen Mother Sports Centre in clause D. The SOCG's Section 2 sets out agreed wording for modifications to clause A of the policy and paragraph 10 of the supporting text, which I consider necessary to meet the Basic Conditions. I note that the modifications to Policy PIM 24 A would address some of the objections made by Montagu Evans to the policy. Section 3 of the SOCG sets out modifications proposed by WCC to Policy PIM 24 (clauses Ae, B and C), with which the Forum disagrees. I understand the Forum's wish to discourage continuous high rise development which would be harmful to its historic environment and character, especially along the riverside. I consider that the second sentence of clause B should be retained to address this concern, but am satisfied that WCC's proposed modification to clause A should be made, as in **PM23**, to remove the ambiguous reference to "comprehensive landscaping proposals", so that regard is had for national planning policy. Clause C need not be modified as it is sufficiently clear and purposeful.
- 4.56 Montagu Evans pointed out that the Queen Mother Sports Centre is bounded by Wilton Road, as well as the other streets named in Policy PIM 24. The proposed development by Vitcorp Ltd at 52-73 Wilton Road, to which Montagu Evans drew my attention, has now been approved on appeal.⁹ However, I agree that the first sentence of clause D of Policy PIM 24 should be modified to include Wilton Road. Section 1 of the SOCG shows that WCC and the Forum disagree over the wording of clause D. I consider that reference to "Pimlico and other local residents" is unhelpful, that the Government's recent introduction of Use Class E makes it more difficult to control changes to commercial and retail uses, and that planning policy cannot determine rent levels. Therefore, I agree with WCC that clause D a should be modified, as the Council proposes in Section 1. I also support WCC's proposed modification to clause D b, so

⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3275399>

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that it is not too onerous and would enable the community facilities to be upgraded and adapted, if required, to meet the community's future needs. In addition, I have read the Forum's proposed changes to D c and D d, but consider that these criteria should be combined, as proposed by WCC, so as to connect improvements to the public realm and pedestrian access. Clause D e should be modified, as proposed by WCC, so that the heritage features are described more precisely, and D f and g should be modified to be in general conformity with the City Plan. I recommend that all the modifications to Policy PIM 24 D put forward by WCC in Section 1 of the SOCG are made, to satisfy the Basic Conditions.

- 4.57 WCC expressed concern that the boundary of the Queen Mother Sports Centre Block on Map 8 includes 1-25 Gillingham Street (Grade II listed terrace), 2-22 Upper Tachbrook Street and 74-77 Wilton Road, all historic buildings within the Pimlico Conservation Area. This, it is suggested, could place the heritage assets at risk of being included in future redevelopment projects, which would be contrary to national and local planning policy. I recommend that Map 8 is revised, so that the above heritage assets are shown separately from the main Queen Mother Sports Centre building. I conclude that Policy PIM 24 and Map 8 should be modified as in **PM23**, so that the Basic Conditions are satisfied.
- 4.58 Paragraph 11 states that there is no evidence of a pressing case for large-scale redevelopment of the Queen Mother site, and WCC commented that this is a subjective comment without evidential support. WCC also argued that paragraph 11 conflicts with Policies 1 and 13 of the City Plan, as it is overly restrictive on the quantum of office floorspace and size of retail units. I have read the revised wording put forward by WCC and the Forum to paragraph 11, and recommend that a compromised modification is made, as in **PM23**, for general conformity with City Plan policies and having regard for national planning policy. I consider it unnecessary to add a new paragraph after paragraph 11 to speculate about funding of public realm improvements.
- 4.59 Regarding paragraph 15, this describes the existing situation for residential use above the Sainsbury outlet. I consider that the paragraph should be retained, but the final sentence should be deleted, as in **PM23**, as it could undermine the provision of new housing development contrary to national and local planning policy. There is no need to add a new paragraph 16 to address the requirements of proposals for part of the block, as policies seeking good design in the Pimlico Neighbourhood Plan, as well as the City Plan and London Plan, should ensure that any implications for the major development site overall were assessed. Providing **PM23** is made, including the addition of a heading: Chapter 6: Larger sites, including the Queen Mother Sports Centre Block to Page 59, I conclude that the policies in Chapter 6 will meet the Basic Conditions for neighbourhood planning.

Appendices and Other Matters

- 4.60 Section 2 of the SOCG includes agreed modifications to Appendix 3 and the Glossary, which I support. WCC raised concerns about Appendix 2, and I consider that the terminology should be used in a precise way to inform readers and users of the Plan, and for general conformity with the City Plan and London Plan. Page 1, Contents, and Page 62, Appendices, refer to Appendix 2: Commercial areas/retail frontages, whereas Page 66 calls it Appendix 2: Retail and Commercial Areas. In Section 3 of the SOCG, WCC proposed that the Appendix should be called Town Centres, to recognise the mixed use character of the areas. I propose that Appendix 2 is called "Town Centres (Retail and Commercial Areas)", noting that it is the reasoned justification to Policy PIM 1 which provides the cross-reference to Appendix 2. I agree with WCC that Appendix 2 should refer to the CAZ Retail Cluster for general conformity with the City Plan and that a note should be added to Page 67, to explain that Tachbrook Street Market is outside the CAZ Retail Cluster. **PM24** should be made accordingly.
- 4.61 I have also had regard for WCC's proposed modifications to the Glossary terms, including its observations on the CAZ Retail Cluster. However, I am satisfied that it does not fail the Basic Conditions and should assist readers of the Plan. On Family Accommodation, I propose that the standard of 3 plus bedrooms in market housing and 2 plus bedrooms for affordable housing, as adopted in the Westminster City Plan, should be referenced in the Glossary to secure general conformity with strategic policies. In addition, the text as drafted provides descriptive material that goes beyond a definition. I recommend the text be replaced as in **PM24**.
- 4.62 Regarding other matters, I have read the comments from a respondent regarding noise and light intrusion from the play area and basketball court between Peabody Avenue and Turpentine Lane. I have sympathy with the residents who consider that their amenity is badly affected. However, it seems to me that this is a site management matter and not a subject for the Neighbourhood Plan.

5. Conclusions

Summary

- 5.1 The Pimlico Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it, as well as the responses from the Forum to my preliminary questions of 27 October 2021.

5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I conclude that, as long as the modifications in Section 2 of the SOCG and the modifications listed in Appendix 1 to my report, are made, the Pimlico Neighbourhood Plan will meet the Basic Conditions. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Pimlico Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan Area boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

5.4 I congratulate the Pimlico Neighbourhood Forum for producing a Plan which covers an extensive range of issues for this intensively developed and historical area within Central London, with its vibrancy and diversity. I appreciate that the Forum has been working hard on the Plan for many years, since its designation in October 2015, and has had to cope with substantial changes, from updates to the strategic plans for London as a whole and the City of Westminster, to dealing with the COVID-19 pandemic. My report includes a significant number of recommended modifications to the submitted Neighbourhood Plan (in order to meet the Basic Conditions and other matters), but I trust the Forum and the local community will appreciate that they are necessary for the production of a Plan which will be sufficiently robust to influence and manage the development of Pimlico over the next 18 years.

Jill Kingaby

Examiner

Appendix 1: Modifications

Note: Section 2 of the Statement of Common Ground sent to the examiner in February 2022, provided at Appendix 2 to this report, includes proposed modifications to the submitted Pimlico Neighbourhood Plan agreed between WCC and the Forum. I have recommended above that the agreed proposed modifications in Section 2 should be made (**PM25**). The proposed modifications (**PMs1-24**) should also be made alongside those agreed modifications.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages 3 and 11	<p>Extend paragraph 2 as follows:</p> <p><i>The London Plan identifies Opportunity Areas, which are significant locations with development capacity to accommodate new housing, commercial development and infrastructure. Victoria, adjacent to the Pimlico Neighbourhood Plan area, is one of the Opportunity Areas identified in Central London, where indicative capacities for growth are shown as 1,000 new homes and 4,000 new jobs. Network Rail is working with a number of partners including WCC and the Greater London Authority to produce a new concept masterplan for the area around and behind Victoria Station. The Forum will monitor progress on the "Future Victoria" masterplan, and any implications for the Pimlico Neighbourhood Area.</i></p> <p>Map 2 – Policies Map</p> <p>As described in paragraph 4.10 of this report, revise the map and its key to provide greater clarity.</p>
PM2	Page 12	Policy PIM 1: Commercial and Mixed Use Centres

		<p>A The Warwick Way/Tachbrook Street CAZ ...(as shown on the Policies Map Map 3)...</p> <p>E Modify this clause as proposed by WCC in Section 1 of the SOCG.</p> <p>F Proposals in the retail centres which make up the town centre hierarchy must ensure</p> <p>Delete the heading "Establishing the viability of an existing use" and clause G from the policy and include clause H under the heading "Heritage impacts".</p> <p>H In any retail centre Proposals within the town centre hierarchy</p>
PM3	Page 13 - 19	<p>Paragraph 4 – add a sentence at the end: Information on many commercial areas is available in Westminster City Council’s Town Centre Health Checks (2019) for the CAZ Retail Cluster.</p> <p>Title to Map 3 – Retail areas Town centre hierarchy</p> <p>Key: CAZ core retail cluster</p> <p>Paragraph 6 – The whole of the Forum area lies within the Central Activities Zone (CAZ) defined designated in the London Plan. The City Plan defines designates.....</p> <p>Paragraph 7 - In addition, this plan defines designates</p> <p>Paragraph 16 – delete, and replace with the modified wording proposed by WCC in Section 3 of the SOCG.</p> <p>Paragraph 17 – modify as proposed by WCC in Section 3 of the SOCG, but further modify the last sentence so that it reads: The scale of new development and the range of uses should preserve or enhance Pimlico’s heritage assets.</p>

		<p>Paragraph 20 – modify as proposed by WCC in Section 3 of the SOCG, but add new text to the final sentence:</p> <p>...the day time and night time economy. <i>New development should also have regard for the amenity of residents living within or adjacent to the CAZ Retail Cluster and avoid or mitigate any harmful effects.</i></p> <p>Paragraph 32 – Modify the title:</p> <p>Development outside the core-CAZ Retail Cluster, Local Centres and Pimlico Parades</p> <p>Modify the wording as proposed by WCC in Section 1 of the SOCG.</p>
PM4	Page 23	<p>Chapter 3: Design and Heritage</p> <p>Paragraph 1 – last sentence:</p> <p>The Conservation Areas are shown on the map 4 in this chapter.</p>
PM5	Pages 25, 27 and 28	<p>Policy PIM 2: Protected historic townscape and views</p> <p>Modify the policy as proposed by WCC in Section 1 of the SOCG.</p> <p>The information on Streets and Views and Townscapes should be removed from Policy PIM 2, and shown after Map 5 under the title: <i>Principal streets and views, and townscapes in Pimlico Conservation Area</i></p> <p>Paragraph 14 – Add a new sentence at the end:</p> <p><i>As the adjoining photographs illustrate, tall or heightened buildings may have a negative impact on the streetscape, and block views down the streets of open skies. A canyon effect along Pimlico’s streets should be avoided where possible, when future development is proposed.</i></p>

PM6	Page 29, 30 and 63	<p>Policy PIM 3</p> <p>A – delete the last sentence</p> <p>Add a new PIM 3 A e) as proposed by WCC in Section 1 of the SOCG.</p> <p>B – delete.</p> <p>Modify the wording of clause B as below, and relocate it in Appendix 1.</p> <p>The following approach to the development of mansard storeys shall generally be applied should be considered in the Pimlico Conservation Area:</p> <p>The squares (St George’s</p> <p>height of the corresponding mansard.</p> <p>Non-Policy Guidance: PDG Roof Extension Principles</p> <p><i>The Pimlico Design Guide, 2004, is now somewhat dated, and cannot override the Westminster City Plan. However, the Design Guide sets out the following general principles for roof extensions which developers may find helpful.</i></p> <p>Roof extensions should a, b, c, d, e ...</p> <p>on the return facade as well as the front.</p> <p>Paragraph 24 - Delete and replace with:</p> <p><i>In order to meet the strategic objective of increasing the stock of high quality housing across Westminster including Pimlico, well-designed upward extensions to provide more housing for growing families will be supported, providing an attractive roofline can be maintained.</i></p>
PM7	Pages 26, 30-32	The label/note on Page 26 next to the photographs should be modified with the

		<p>addition of :open aspect and return frontage, (see Policy PIM 4 B).</p> <p>Policy PIM 4: Design in the Pimlico Conservation Area</p> <p>Modify clause E as proposed by WCC in Section 1 of the SOCG.</p> <p>Delete paragraph 25 and replace with:</p> <p><i>Pimlico Conservation Area Audit (eg. paragraph 4.15) provides additional information on the separation of frontages as sought by Policy PIM 4 C.</i></p>
PM8	Page 33	Policy PIM 5 – Delete the final sentence.
PM9	Page 34	<p>Paragraph 42 - Delete the second sentence and replace with:</p> <p><i>Any new development should demonstrate how it would meet Westminster’s housing needs, notably the need for family-sized accommodation, whilst preserving or enhancing the character of this block of flats within the Conservation Area.</i></p>
PM10	Pages 35 and 71	<p>Paragraph 43 – Delete the third sentence, and add new wording:</p> <p><i>Following a more recent review of the audits, ¶ this plan is therefore adding a short additional listThe red telephone boxes (as illustrated in Appendix 3, and their location is shown on Map 6) are an attractive part ... Twentieth Century heritage assets.</i></p> <p>Add a new paragraph following paragraph 43, as proposed by WCC in Section 3 of the SOCG, beginning <i>Telephone boxes are often allowed</i></p> <p>Appendix 3 – Add a photograph of the Giles Gilbert Scott telephone boxes, with a reference to Policy PIM 8 of the Plan.</p>

PM11	Pages 35, 36	Policy PIM 9: Non-designated heritage assets, reasoned justification paragraphs 44-51 and the Non-Policy Guidance statement should be deleted.
PM12	Page 37	<p>Policy PIM 10: Shopfronts and Signage (including Hotels)</p> <p>Development proposals for newhigh quality design and, where relevant, retain or enhanceshopping frontage and, where relevant, the Conservation Area</p> <p>Clause c should be modified, and a new reasoned justification added to the end of the policy, as proposed by WCC in Section 3 of the SOCG.</p>
PM13	Pages 38 and 63	<p>Modify Policy PIM 11, and paragraphs 52-55, as proposed by the Forum in Section 1 of the SOCG.</p> <p>Further modify Policy PIM 11 B. as follows:</p> <p>The highest point ...</p> <p>a. clearly be subordinate in appearance to the building below; and</p> <p>b. respect the scale and built form of the building below the reference height, as well as adjacent buildings and the street scene; and</p> <p>c.</p> <p>Further modify the last sentence of paragraph 52, as proposed by the Forum in Section 1 of the SOCG, to read:</p> <p>Reference heights refers to the maximum characteristic height average height of buildings in the streets across Pimlico, as illustrated in Appendix 1, Maps 9 and 10 above street level of the townscape.</p> <p>APPENDIX 1</p> <p>Map 9 – Building height map showing Pimlico Conservation Forum Area.</p>

PM14	Page 45	<p>Policy PIM 13</p> <p>Modify clause B to read:</p> <p>Proposals to add a mansard roof or roof extension in the Pimlico Conservation Area <i>will be favoured when</i> should be combined with the existing unit below to provide a family-sized residential unit as opposed to an additional 1-bedroom flat.</p> <p>Paragraph 8 - Replace the second sentence with: <i>Additions and extensions to the housing stock need to be designed to a high quality, and at a scale which satisfies the Nationally Described Space Standards.</i> Many of the conversions</p> <p>Paragraph 9 – third sentence should read:</p> <p>The policies in Chapter 3 increase 3 or 4 bedroom units as opposed to an <i>as well as the provision of new smaller units.</i> The lack of family sized units supports this policy.</p>
PM15	Page 45	<p>Policy PIM 14: New title <i>New housing</i></p> <p>Modify the policy as proposed by WCC in Section 1 of the SOCG.</p>
PM16	Page 46	<p>Policy PIM 15: Affordable housing</p> <p>Modify the policy wording and paragraph 15, as proposed by WCC and set out in Section 1 of the SOCG.</p> <p>Paragraph 16 should be deleted and replaced with:</p> <p>16 There are considerable concentrations of social housingHousing Association developments, and Pimlico has aover social housing. <i>Nevertheless, as demonstrated in Westminster’s City Plan, there is an acute need for additional social housing and intermediate housing in the Borough, including Pimlico.</i></p>

PM17	Page 46	<p>Paragraph 18 – revise as follows:</p> <p>All of the hotels are in streets which are almost entirely residential substantially residential (eg.) or if not residentialresidential or close to residential properties eg. Belgrave Road.</p> <p>Paragraph 20 – Modify the wording as follows:</p> <p>This means that <i>The particular concern for residential amenity is larger hotels shouldto generate the level of traffic and disturbance from late-night arrivals and servicing that hotels, particularly large hotels create.</i> However, smaller hotels would be less problematic <i>New hotels should be directed to the Warwick Way/Tachbrook CAZ retail cluster, the Local Centres and the Pimlico Parades in accordance with the town centre hierarchy.</i></p> <p><i>Outside the designated town centres, where hotel uses are proposed in predominantly residential areas, proposals must demonstrate that they will be of a scale that does not result in harm to the overall residential character, and would not be harmful to the amenity of residents.</i></p> <p>Paragraph 21 - Add a new sentence at the end: <i>Westminster City Plan’s Policy 8 and its reasoned justification provide additional relevant information on this matter.</i></p>
PM18	Page 48, 50 and 74	<p>Policy PIM 17: Protection and maintenance of local green spaces</p> <p>A The 7 areas shown as Local Green Spaces on the policies map Map 7 are designated as such <i>important Green squares and gardens for the Pimlico community.</i> (These are Pimlico Gardens Bessborough Gardens.)</p>

	<p>B Proposals for built development on or underneath these Local Green Spaces Green squares and gardens must be consistent with policy for Green Belts and should enhance their role and function as green spaces of that Local Green Space.</p> <p>The 7 Local Green Spaces.....'very special circumstances.</p> <p>Paragraph 6 – The formal green spacesneed protection and any development must be highly exceptional should be limited to schemes which complement their use as Green squares and gardens. They are all designated as Local Green Spaces by this plan and the justification is given in Map 7 shows their location within Pimlico, and Appendix 4 describes their key features and why they are special to the local community. This gives a strong level....inappropriate development. Some of these spaces ...for all the Local Green Spaces, given the shortage ofGrosvenor Road.</p> <p>Map 7 – Piazzas, green and open spaces</p> <p>On the key, delete "Local green spaces" and replace with "Green squares and gardens"</p> <p>Appendix 4: Local Green Spaces squares and gardens and Open Spaces</p> <p>Pimlico is short of recreational spacesets out their value to the area, Local Green Space Green squares and gardens and Open Spaces.</p> <p>The NPPF (Para 100).....extensive tract of land.'</p> <p>This table identifiesThey are a) in reasonably close extensive tract of</p>
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		land. Their special features are set out in the table. In the table below, modify the heading by deleting "Local Green Space" and inserting "Green squares and gardens".
PM19	Pages 52 and 53	Paragraph 15 – The locations of the piazza spaces are shown on the Open and Green Space Map 7. The piazzas at present compromise both paved and unpaved areas. Policy PIM 19, and Policy PIM 22, seeking improvements to the public realm, support the Mayor of London’s Healthy Streets Approach and targets to increase active travel and public transport over car use. Policies T2 and T6 of the London Plan provide further details. As Vauxhall Bridge Road forms part of the Transport for London (TfL) Road Network, any proposals for works there would need to be discussed with TfL. Policy PIM 20: River crossings Proposals for a new bridge ...in Pimlico is maintained and is encouraged to meet the highest environmental standards of design and materials. In particular Modify the remainder of the policy as proposed by WCC in Section 3 of the SOCG.
PM20	Page 53	Policy PIM 21: Riverside activities A Development proposals adjacentenjoyment of the riverside and meet the highest environmental standards of design, materials and waste minimisation will be encouraged..... Add a new footnote to the policy: Prior to proposing development along the riverside, developers should consult the Port of London Authority’s

		document "A Safer Riverside Guidance".
PM21	Page 55	Paragraph 27 Wilton Road The modifications proposed by WCC in Section 3 of the SOCG should be made.
PM22	Pages 56 & 77	Policy PIM 23: Renewable energy and air quality Modify the policy's clauses B-F as proposed by WCC in Section 1 of the SOCG. Expand paragraph 30 by adding the definition of Zero local emissions proposed by the Forum in Section 1 of the SOCG. Add a sentence to the end of paragraph 30 as follows: <i>New development should meet the requirements of strategic planning policy in the London Plan's Chapter 9: Sustainable infrastructure, and Westminster City Plan's Policy 32: Air Quality, and Policy 36: Energy.</i> The definition of Zero local emissions, proposed by the Forum in Section 1 of the SOCG, should be added to the Glossary.
PM23	Pages 58, 59 and 60	Map 8 - Queen Mother Sports Centre Block Modify the map to show as Heritage Assets – 1-25 Gillingham Street, 2-22 Upper Tachbrook Street, and 74-77 Wilton Road. Add a heading to Page 59: <i>Chapter 6: Larger sites, including the Queen Mother Sports Centre Block</i> Policy PIM 24: Major development Clause A e should be modified as proposed by WCC in Section 3 of the SOCG.

		<p>Clause D a-g should be modified as proposed by WCC in Section 1 of the SOCG.</p> <p>Paragraph 11 – Modify the text as proposed by the Forum in Section 1 of the SOCG, with the following additional modifications:</p> <p>There have been various suggestions .. in Chapter 1 and for the Warwick Way/Tachbrook Street area within the CAZ retail cluster.....set out above:</p> <ul style="list-style-type: none"> - Major development needs to foremost should support continuation of a sports/leisure facility of comparable scale and function as the Queen Mother Sports Centre....but should not be designed toclose to a residential area. - Proposals for new development on the site should ensure that they promote sustainable transport methods and do not have an unacceptable impact on the highway in terms of traffic. - Development which complements the larger offices encouraged. - Business premises in Pimlicoattract multiple chain stores. - 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. <p>Paragraph 15 – delete the last sentence.</p>
PM24	Pages 1, 62, 66, 67 and 77	<p>Modify the heading for Appendix 2, on Pages 1, 62 & 66, so that it reads Town Centres (Retail and Commercial Areas)</p> <p>On Page 67, under "Location" for Tachbrook Street/Market" add: The</p>

		<p>market is outside but in close proximity to the CAZ Retail Cluster.</p> <p>GLOSSARY</p> <p>Family Accommodation</p> <p>Delete all text and replace with:</p> <p><i>In respect of development this means housing units with between three and five bedrooms. For affordable housing, units with two bedrooms may be considered suitable for families, but this will be at the discretion of the council based on need on the council’s waiting lists and the size of the unit. In addition, development should meet NDDS (Nationally Described Space Standards).</i></p>
PM25	Whole Plan	The changes shown in Section 2 to the SOCG are recommended, alongside the revisions set out in the individual modifications above (PM1–PM24).

Appendix 2: Statement of Common Ground

Separate attachment.