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Date: 23rd August 2021

Dear Peter,

Westminster City Council response to the submission draft Pimlico Neighbourhood Plan (Regulation 16)

Thank you for your formal submission of the draft Pimlico Neighbourhood Plan and associated documents. Clearly an immense amount of time, effort and hard work has gone into the preparation of a neighbourhood plan that supports the community's ambitions for the Pimlico Neighbourhood Area, and as such the council supports the submission of the Pimlico Neighbourhood Plan and commends the work of the Pimlico Neighbourhood Forum.

In order to pass through independent examination, the Plan must meet the Basic Conditions (BC) set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. This principle is also set out in Paragraph 37 of the National Planning Policy Framework (NPPF).

Whilst the broad principle of most of the Neighbourhood Plan's policies are supported, we believe further amendments are still needed to some of them to ensure they are robust, effective and enforceable, thereby complying with national planning policy. This requirement is set out in Paragraph 16 of the NPPF, which states that plans should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Comments and suggested amendments to ensure this is the case for all policies are set out in **Appendix 2** attached to this letter.

Nevertheless, there remain some areas of concern for the council in terms of the principle or requirements of some aspects of certain policies which do not meet the Basic Conditions, and would therefore need to be more fundamentally changed, namely:

- **Policy PIM1 Commercial and Mixed-Use Centres.** The policy should better reflect what can be controlled through a planning application in light of recent changes to the Use Classes Order. The approach to marketing is too restrictive and should be supported by a clear evidence base. PIM1 should be amended.
- **Policy PIM3 Upward extensions in the Pimlico Conservation Area.** The policy approach is too prescriptive, focuses too much on mansards and does not have sufficient regard to the need to protect listed buildings. PIM3 should be amended.
- **Policy PIM4 Design in the Pimlico Conservation Area.** Whilst the policy principle is supported, PIM4 should have regard to the need to preserve listed buildings and other heritage features such as shopfronts. PIM4 should be amended.
- **Policy PIM5 South Westminster Conservation Area (Peabody Avenue).** Whilst the policy principle is supported, the reference to heights is unclear and should be deleted. PIM5 should be amended.

- **Policy PIM7 Dolphin Square.** Whilst encouragement of family-sized homes is supported, the policy should recognise that the City Plan already sets out a target for family-sized homes and that each development proposal will be assessed on an individual basis. PIM7 should be amended.
- **PIM9 Design Review Panel.** Neighbourhood Plans should not attempt to dictate to the council on operational issues but should focus on land use matters. PIM9 should be deleted as it does not deal with land use matters.
- **PIM11 Tall buildings.** Whilst the policy principle is supported, the issue is already managed by the City Plan and the London Plan and the role of the “reference heights” is unclear. PIM11 should be amended.
- **PIM13 Residential conversions.** The Nationally Described Space Standards should apply to all new homes (not only to conversions and extensions as suggested by PIM13). The requirement to link roof extensions to existing units is also contrary to the City Plan and precludes the creation of new homes. PIM13 should be amended.
- **PIM14 New-build housing sizes and types in Pimlico.** PIM14 is not in accordance with the City Plan which emphasises the optimisation of sites in terms of the mix of units. There should be a stronger link between older people’s accommodation and need for 2-3 bedroom units supported by a clear evidence base. Moreover, it should be clarified why affordable housing for older people is not encouraged. PIM14 should be amended.
- **PIM15 Affordable housing.** Planning policy cannot control the allocation of homes. Moreover, the City Plan already address the more general issues of provision of specific types of housing. PIM15 should be amended.
- **PIM16 Hotels and short-term let properties.** PIM16 attempts an outright ban on studios. As explained in relation to PIM14, PIM16 is not in accordance with the City Plan which allows for the optimisation of sites whilst restricting studios to no more than 10% of the units provided in a single development. PIM14 should be amended.
- **PIM17 Protection and maintenance of local green spaces.** PIM17 designates seven open spaces that are already protected by the City Plan and covered by other designations as Local Green Spaces. The National Planning Guidance cautions against designating Local Green Spaces where land is already protected by other designations. PIM17 should be deleted.
- **PIM24 Major development.** Clause D sets out specific requirements that development proposals affecting the Queen Mother Sports Centre block should be assessed against. Among other requirements, the policy prevents new retail uses, large commercial units and bans significant residential uses on the site – this is all contrary to the City Plan. Clause D should be supported by a clear evidence base. PIM24 should be amended.

Detailed comments and suggested amendments on the policies the council believes do not meet the Basic Conditions are set out in [Appendix 1](#) attached to this letter.

We hope you consider our suggestions to be constructive, as the council wishes to continue working positively with the Pimlico Neighbourhood Forum to support the plan through the examination process, to ensure it is robust and enforceable whilst continuing to meet the aspirations of the local community.

Yours sincerely,

Marina Molla Bolta

Marina Molla Bolta Assoc RTPi

Planning Policy Officer

Appendix 1: Comments on the policies of the Pimlico Neighbourhood Plan that do not meet the Basic Conditions

| Policy | Comment |
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| Chapter 2: Delivering a vibrant commercial sector to support our area | |
| <p>PIM 1</p> | <p><u>Clauses A & G:</u></p> <ul style="list-style-type: none"> • PIM 1 (or its RJ) should explain that many town centre uses may fall within Class E and that Permitted Development Rights between Class E and C3 may mean the policy is ineffective (the RJ could refer to potential for a new Article 4 Direction that would allow the realisation of some of the policy aims). • Clause A and Clause G refer to ‘main town centre uses’ and uses considered ‘generally acceptable in the retail centres’ respectively. The reasoning below the policy talks about the different types of uses that may be appropriate in the different centres and includes uses such as offices. To avoid confusion, clauses A and G should be redrafted to better align with City Plan Policies 14, 15 and 16. It would be helpful if the policy clearly stated which uses are supported at ground floor level and above it. As drafted, the policy could be read as if uses such as office would be acceptable on the ground floor of the CAZ Retail Cluster whereas City Plan Policy 13 B would not accept it (albeit under Class E change of use proposals from retail to office would not need planning permission). Clause G should also be clarified and explicitly say to which uses it applies in order to enable it to be applied effectively. • Clause G “a” marketing requirements are not in accordance with City Plan Policies 13 D and 16 B. Moreover, “b” is too onerous and prescriptive. The approach to marketing should be amended to be in accordance with the City Plan. • As drafted, Clauses A and G do not meet the Basic Conditions (general conformity with the strategic policies) and should therefore be amended. <p><u>Clause F:</u></p> <ul style="list-style-type: none"> • To be in accordance with national policy and guidance, Clause F should be amended to reflect NPPF language which requires in the first instance that harm is avoided or minimised. Clause F should be amended (e.g. “do not have a significant level of harm to conserve” and “must seek to avoid or minimise harm”). • Clause F could also be more positively worded and could ask applicants to bring forward design proposals that contribute positively rather than detract. Most of Pimlico is covered by Conservation Area designations which would also contribute to this goal. We suggest the last sentence is delated as it does not add to the first one. • As drafted, Clause F does not meet the Basic Conditions (having regard to national policies / general conformity with the strategic policies) and should therefore be amended. |
| <p>Par. 14</p> | <ul style="list-style-type: none"> • Whilst we understand the rationale behind the statement, Par. 14 is not in accordance with City Plan Policy 1 which supports mixed-use developments and mixed areas in terms of land uses in the CAZ (please note that Pimlico is within the CAZ). Although in principle main town centre uses should be directed to the town centre hierarchy, it may be that other sites outside of the town centre hierarchy are suitable for other non-residential uses. Par. 14 should be amended to explain that it is not trying to ban any non-residential uses from all the areas within the Neighbourhood Area not covered by the town centre designation. |

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| | <ul style="list-style-type: none"> As drafted, Paragraph 14 does not meet the Basic Conditions (general conformity with the strategic policies) and should therefore be amended. |
| Par. 26 | <ul style="list-style-type: none"> Please use the word “designate” instead of “defines”. In accordance with City Plan Policy 14 C, Local Centres should provide a mix of commercial and community uses to meet resident’s day to day shopping needs, provide local employment opportunities, and support opportunities for community interaction. Moreover, uses located at ground floor level should have active frontages and serve members of the public. The approach set out in Par. 26 is slightly contrary to City Plan Policies 14 and 15 as, for example, some food and drink uses may be acceptable within a Local Centre. As drafted, Paragraph 26 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies). |
| Par. 32 & 33 | <ul style="list-style-type: none"> As explained above (for Par. 14), Par. 32&33 are not in accordance with City Plan Policy 1 which supports mixed-use areas. Par. 32&33 could be interpreted as a ban of all uses except residential in many areas of Pimlico not covered by any town centre designation. However, Par. 32&33 are slightly contradictory: it is unclear if non-residential uses are welcomed or not. As drafted, Paragraphs 32&33 does not meet the Basic Conditions (having regard to national policies / achievement of sustainable development / general conformity with the strategic policies). |
| Chapter 3: Design and Heritage | |
| PIM3 | <ul style="list-style-type: none"> PIM3 should reference the need to protect historic roof forms of listed buildings as, as drafted, PIM3 does not have sufficient regard to the need to preserve the special interest of listed buildings and their settings. <p>Clause A:</p> <ul style="list-style-type: none"> While mansards may be an appropriate design response in many areas of the Conservation Area, this may not be the case in all locations (please also note that the word “generally” weakens the policy and should be removed). Clause A should be amended (e.g. In the Pimlico Conservation Area, upward extensions of original terraced houses properties should generally be in mansard form). This will avoid confusion to applicants and decision-makers by differentiating from other building types where mansard may not be the most appropriate form of extension. Clause A should be clear that it applies to the main roof and not to the rear wings. <u>Comments on the requirements:</u> <ul style="list-style-type: none"> “a” – It is unclear how it will be applied if the extension is not in mansard form. “b” – It is unclear how it will be assessed if there is “minimal visual intrusion”. Instead of referencing guidance, we suggest it is explained in PIM3 or in the RJ. “d” – It is unclear how it will be assessed if there is “excessive height” or not. Instead of referencing guidance, we suggest it is explained in PIM3 or in the RJ. |

- We suggest the reference to the Pimlico Design Guide (it is a bit old and could be replaced during the Plan’s period) is removed although drawings from the guide could be attached in an Appendix to illustrate. Also, please note there is no reference to the Conservation Area Audit which includes a map which postdates the audit of where roof extensions may and may not be acceptable).
- **As drafted, Clause A does not meet the Basic Conditions (having regard to national policies / general conformity with the strategic policies) and should therefore be amended.**

Clause B:

- Clause B approach is too prescriptive and not in accordance with **City Plan Policies 39 and 40** which consider specific townscape context and are focused on maintaining a degree of uniformity within the roofscape where it exists – which is very important to roofscape character in areas such as Pimlico. All limits should be evidence-based to be supported. We suggest Clause B is redrafted and criteria are replaced by a simpler policy more focused on protecting/maintaining consistency in the roofscape but which still recognises one additional roof storey will generally be appropriate subject to design/heritage considerations and where there is no existing mansard or roof extension.
- Comments on the requirements:
 - “a”:
 - Please note most of the buildings in St Georges Square, Warwick Square and Eccleston Square are listed buildings. Consideration would need to be given to their historic roof structure so a single mansard may not always be appropriate. Clause B “a” should be amended to have regard to the need to protect the special interest of listed buildings.
 - We suggest you use the word “sheer story” rather than “continuation of the façade”.
 - To be clear, the policy should be redrafted to take into account the different circumstances (e.g except where there is **already a an existing sheer story, mansard or other** roof extension **that is the continuation of the façade**).
 - “c” and “d”:
 - It is unreasonable to suggest that there would be no possibility of any upwards extensions in some entire streets, and this may fail to optimise space in line with **City Plan** policies.
 - It is unclear why buildings of the same number of storeys acceptable for a roof extension on east-west streets but not north-south streets.
 - It is unclear what the logic is for “c” where roof extensions would not be acceptable. Have all buildings within these streets already had extensions permitted? And are there any streets where this exists other than those where the top storey is already a mansard?
- In general, it is unclear what “storey” means (e.g not clear whether the Forum means 4 storeys including the ground floor storey, or 4 storeys above the ground floor storey). It should also be clear if a later roof extension should be considered as a storey.
- To help clarify the policy approach, it would be helpful to include diagrams for different building types and mapping that show where there are listed buildings and where mansard extensions have already been permitted and what the approach is to these. This could be attached in an Appendix.

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| | <ul style="list-style-type: none"> As drafted, Clause B does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. |
| PIM4 | <p>Clause E:</p> <ul style="list-style-type: none"> Clause E is contrary to City Plan Policy 40 B which requires new development to conserve and integrate characteristic architectural details including shopfronts. We suggest Clause E is redrafted (e.g.: ‘Where the principle of conversion to residential use is acceptable, and where no characteristic shopfronts and railings exist at ground floor level, an alternative design...’). Notwithstanding this, it is acknowledged that opaque or frosted glazing may not always be successful, as noted within the RJ. As drafted, Clause E does not meet the Basic Conditions (general conformity with the strategic policies) and should be amended. <p>Clause F:</p> <ul style="list-style-type: none"> Clause F is contrary to City Plan Policies 39 and 40. As explained above (for PIM3), PIM4 should preserve the special interest of listed buildings (and its historic roof forms) and have regard to maintaining a degree of uniformity within the townscape (please note PIM 4 F encompasses Grade II listed buildings, including those around three identified squares). Furthermore, PIM 4 could result in mansards without a front terrace being closer to the roof edge than those with a set-back terrace, resulting in an inconsistent roofscape. As currently worded, PIM4 F implies permission would be granted for any front terrace, so long as it has the prescribed set back, without regard to the prevailing context, which could diminish the uniformity of the townscape, contrary to City Plan Policy 40. There could also be visual harm from roof clutter associated with the high-level activity of a roof terrace. Where a set-back is not appropriate as it would disrupt uniformity, a dummy mansard could be an alternative approach. Clause F should be redrafted to be less prescriptive and enable greater flexibility to allow decision makers to have regard to prevailing context to ensure a degree of uniformity within the roofscape can be maintained. As drafted, Clause F does not meet the Basic Conditions (general conformity with the strategic policies) and should be amended. <p>Clause G:</p> <ul style="list-style-type: none"> In line with comments above (for Clause F), Clause G should be amended to have regard to the need to preserve the character and special interest of listed buildings. Clause G should also recognise the need to maintain uniformity within the townscape and flexibility to ensure that any rear terrace maintains a degree of uniformity within the roofscape and is not harmful to the character and appearance of the host building and surrounding Conservation Areas. As drafted, Clause G does not meet the Basic Conditions (general conformity with the strategic policies) and should be amended. |
| Par. 26 | <ul style="list-style-type: none"> In line with comments above (for PIM 4 E), the removal of historic shopfronts or front railings is contrary to City Plan Policy 40 B and Par. 26 should be amended to ensure that where characteristic shopfronts are evident, these should be retained and integrated. As drafted, Paragraph 26 does not meet the Basic Conditions (general conformity with the strategic policies) and should be amended. |
| PIM5 | <ul style="list-style-type: none"> It is unclear when the last sentence would apply – would it apply to development within the Conservation Area or also if outside? This sentence is overly restrictive and not evidence-based. It also conflicts with policy PIM11 which explains what development would need to consider if building above 11m on Peabody Avenue (PIM 11 does not ban development above 11m). We suggest this sentence is deleted. |

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| | <ul style="list-style-type: none"> As drafted, PIM5 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should be amended. |
| PIM7 | <p>Clause A:</p> <ul style="list-style-type: none"> It is unclear why Clause A only supports intensification if it provides a significant proportion of new residential units as family accommodation. This link and identified need within this block must be well evidence based to be supported as, as drafted, Clause A may be contrary to City Plan Policies 9 and 10 in relation to the mix of sizes. City Plan Policy 10 sets out a target for family-sized homes and recognises that each development proposal will be assessed on an individual basis. Moreover, the right mix of sizes on an individual site may change over the Plan period and be different across tenures. City Plan Policy 11 also explains how the council’s Annual Affordable Housing Statement will set out up-to-date affordable unit size requirements based on actual need and demand. We suggest Clause A is redrafted (e.g. Development which increases the density of Dolphin Square as a whole will only be acceptable if it provides a significant proportion of should contribute to the provision of new family sized new residential units as family accommodation in accordance with identified need). As drafted, Clause A does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. <p>Clause C:</p> <ul style="list-style-type: none"> Clause C is too restrictive as any alterations or development will materially impact on views. To be in accordance with City Plan Policy 40, we suggest Clause C is amended to require development to “positively contribute to views”. We also suggest C considers other views. As drafted, Clause C does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. |
| PIM9 | <ul style="list-style-type: none"> PIM9 encourages the council to set up and follow the advice of a Design Review Panel when assessing applications. However, Neighbourhood Plans should not attempt to dictate to the council on operational issues / implementation but should focus on land use matters. Moreover, the proposal in PIM9 does not seem to be a specific one for the Neighbourhood Area (this is set out in the non-policy guidance, p36). The council already has design review processes in place which do not include a Design Review Panel but are in line with requirements of London Plan Policy D4. As drafted, PIM9 does not meet the Basic Conditions (having regard to national policies) and should be deleted. |
| Non-policy guidance | <ul style="list-style-type: none"> As explained above (for PIM9), a Neighbourhood Plan cannot ask the council to set up a Neighbourhood Design Review Panel and give it more weight when assessing planning applications. Planning regulations clearly state what is considered of “material consideration” when assessing applications. The Forum could set up its own Design Review Panel and use its conclusions when commenting on planning applications. As drafted, this guidance does not meet the Basic Conditions (having regard to national policies) and should be deleted. |
| PIM11 | <p>Clause A:</p> <ul style="list-style-type: none"> We suggest “listed buildings” and “unlisted buildings of merit” are separated as significantly more protection (statutory) protection is afforded to setting of listed buildings. |

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| | <p>Clause B:</p> <ul style="list-style-type: none"> • Clause B is unclear. What does “to be subordinate to the main lower part of the building” mean (does it mean that above the reference heights in Clause C heights must be slender)? <p>Clause C:</p> <ul style="list-style-type: none"> • Clause C sets out reference heights for different locations that should be used when assessing planning applications for new tall buildings in Pimlico in accordance with Clause A. Out of six ‘reference heights’, five are below 18 metres (London Plan Policy D9 sets out that the height of a tall building will not be less than 18 metres). To be supported, the Forum would need strong evidence to justify the 20m limit (Appendix 1 and the RJ are not considered to be sufficient evidence). Moreover, City Plan Policy 41 defines tall buildings as “buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline”. As drafted, the role of the “reference heights” is unclear and can cause confusion to the applicant and decision-maker. We suggest Clause C is deleted and Clause A clearly sets out the policy goal – for new tall buildings in Pimlico to take into account townscape and heritage. • As drafted, PIM11 does not meet the Basic Conditions (having regard to national policies / general conformity with the strategic policies) and should therefore be amended. |
| Chapter 4: Housing and hotels | |
| Par. 7 | <ul style="list-style-type: none"> • Any evidence papers that show that Pimlico needs more family housing and older people accommodation than other parts of the city should be referenced in a footnote. Local housing need evidence is needed to support these statements and policies. • It is unreasonable to suggest that all small homes are used for short-term letting. A ban on a certain size of homes is contrary to City Plan Policies 8 and 10 and needs to be evidence-based to be supported. • As drafted, Paragraph 7 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies). |
| Par. 11 | <ul style="list-style-type: none"> • As explained below (for PIM13) Westminster (and therefore Pimlico) have a need for all types of housing. Accordingly, it is unreasonable to ban small flats and the idea is contrary to City Plan Policies 8 and 10. Moreover, planning policy cannot control if people stay more or less in a location and how homes are allocated. • As drafted, Paragraph 11 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies). |
| Par. 12 and 13 | <ul style="list-style-type: none"> • Any evidence papers that show that Pimlico has a shortage of market housing for older people should be referenced in a footnote. Local housing need evidence is needed to support these statements and policies. • As drafted, Paragraphs 12 and 13 do not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies). |
| PIM13 | <p>Clause A:</p> <ul style="list-style-type: none"> • It is unclear why the Nationally Described Space Standards (NDSS) should only apply to “conversions” and “extensions”. To be in accordance with City Plan Policy 13 which requires all housing development to meet the NDSS, Clause A should be amended (e.g. “Any new homes |

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| | <p>residential units arising through (including conversions and extensions) or any proposals to extend existing units must meet or exceed the Nationally Described Space Standards).</p> <ul style="list-style-type: none"> As drafted, Clause A does not meet the Basic Conditions (having regard to national policies / general conformity with the strategic policies) and should therefore be amended. <p>Clause B:</p> <ul style="list-style-type: none"> Clause B is contrary to City Plan Policy 8 A as it precludes the provision of new homes through upwards extensions that can contribute to future housing supply and may be permissible under City Plan Policy 40 E in circumstances. Council’s evidence of housing need (see document EV_H_002 Housing Needs Analysis in the council’s Examination Library) indicates there is a need for all housing of all sizes across Westminster – no robust evidence has been provided to the contrary to support the proposed policy approach. As drafted, Clause B does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. |
| PIM14 | <p>Clause A:</p> <ul style="list-style-type: none"> It appears that Clause A seeks an outright ban on studio flats in Pimlico – this is contrary to City Plan Policy 8 which emphasises the optimisation of sites in Westminster and City Plan Policy 10. As drafted, Clause A does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. <p>Clause B:</p> <ul style="list-style-type: none"> While we welcome the Forum’s encouragement of older people accommodation in Pimlico, and the need for single level properties is understood, it is unclear why this requires 2-3 bedroom units, or lift access if provided at ground floor. Clause B should be evidence based to be supported. It is also unclear why only market housing is encouraged and not older people affordable housing - this is contrary to City Plan Policies 9 and 10. As drafted, Clause B does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. |
| PIM15 | <ul style="list-style-type: none"> Westminster has a high level of housing need and the allocation of affordable housing, where provided, falls outside of planning policy. City Plan Policies 8, 9 and 10 set out the council’s approach to maximising affordable housing delivery in response to identified needs. To reflect this, policy should be amended to be in accordance with the City Plan (e.g. “The provision of family sized affordable residential units (including intermediate homes) that help meet local need is encouraged, particularly where these units are offered to people already living in the area. In particular, provision is encourages which prioritises intermediate housing for key workers who need to be located in, or close to, the area or for whom there is a clear professional benefit is encouraged”). As drafted, PIM15 does not meet the Basic Conditions (general conformity with the strategic policies) and should therefore be amended. |
| PIM16 | <p>Clause D:</p> |

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| | <ul style="list-style-type: none"> • It is unclear how Clause D will be implemented and what “very limited self-contained living space” means. If Clause D is seeking to impose an outright ban on studios this is contrary to City Plan Policies 8 and 10 (which allows for 10% of new homes to be studios), and needs to be evidence-based to be supported. • As drafted, Clause D does not meet the Basic Conditions (general conformity with the strategic policies) and should therefore be amended. |
| Chapter 5: Open Spaces, Pedestrian and Transport Facilities, Protecting the Environment | |
| PIM17 | <p>Clause A:</p> <ul style="list-style-type: none"> • Clause A designates seven open spaces that are already protected by City Plan Policy 32. Moreover, many of these spaces are already covered by other designations (e.g. Conservation Area, London Square). The National Planning Guidance on ‘Open space, sports and recreation facilities, public rights of way and local green space’ cautions against designating Local Green Spaces where land is already protected by other designations. The designation is therefore considered unnecessary. There is also a lack of evidence of consultation with landowners in line with the guidance (see Paragraph 019). <p>Clause B:</p> <ul style="list-style-type: none"> • If the designation is to be retained, Clause B should be removed as it provides unnecessary duplication of the NPPF. If retained, the policy should recognise that it may not always be possible to “enhance” the role or function of a Local Green Space through new development and that development that contributes to “maintain” it should also be welcomed. Clause B should be redrafted to be in accordance with City Plan Policy 34 (see paragraph 34.5). • As drafted, PIM17 does not meet the Basic Conditions (having regard to national policies) and should therefore be deleted. If to be retained, Appendix 4 should be updated and explain any additional local benefits that would be gained by the designation. |
| Chapter 6: Larger sites including the Queen Mother Sports Centre Block | |
| PIM24 | <p>Clause D:</p> <ul style="list-style-type: none"> • Clause D should be supported by a clear evidence base, be more positive and explain how the site can contribute to achieving the Plan’s vision for Pimlico. • <u>Comments on the requirements:</u> <ul style="list-style-type: none"> ○ “a”: <ul style="list-style-type: none"> ▪ The first part of the clause strays into justification and should be removed. It is also unclear what the “central area” is and what is the difference between “Pimlico” and “other local residents” is. ▪ We welcome the support for main town centre uses on the site as this aligns with City Plan Policies 14, 15 and 16 (and a large portion of the site falls within a CAZ Retail Cluster). However, it is not possible to limit the provision of retail floorspace as retail is a main town centre use that falls within Class E (planning policy cannot therefore control the loss of existing retail units and its re-provision). It is also unclear how it would be assessed if the use “competes with existing retail provision”. Moreover, changes of use between Class E may not need planning permission (see comments for PIM1). We |

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| | <p>suggest “a” is redrafted and sets out an expectation for town centre uses providing active frontages at ground floor level to be in accordance with City Plan Policies and PIM1.</p> <ul style="list-style-type: none"> ▪ Planning policy cannot control rent levels. We suggest the last sentence is therefore removed. ○ “b”, “c” and “d”: <ul style="list-style-type: none"> ▪ We welcome the recognition of the importance of the leisure facility and the support for public realm improvements (please note the policy number reference is missing in “c”). We also agree that any development proposals should positively contribute to permeability. However, “d” could prejudice a more appropriate design for the site and compromise its optimisation. We suggest this is redrafted to require proposals to seek to enhance permeability and public space provision within the site and in the vicinity. “c” and “d” could be merged. ○ “e”: It is unclear to which buildings “e” applies to. Some of the buildings within the block are listed buildings or fall within a Conservation Area. ○ “f”: Although the support for small businesses is welcomed, it is unreasonable to ask all applicants to design units that cannot be sub-divided. We suggest the second sentence is removed as it is contrary to City Plan Policies 1 and 13 (the block is within the CAZ). ○ g”: It is unclear what “significant” means, making this clause as drafted ineffective. If this is intended as a ban on residential uses on the site, this is not supported as it is contrary to City Plan Policies 1 and 8 which support residential development as a high priority across the city. The site offers scope for mixed use development and to accommodate a range of uses that do not compromise one another, meet a range of policy goals and that can also help support the vitality and viability of the CAZ Retail Cluster. Policy should not preclude this. <ul style="list-style-type: none"> ● As drafted, PIM24 D does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. Comments about the site’s boundary are provided in Appendix 2 (for Map 8). |
| Par. 11 | <ul style="list-style-type: none"> ● <u>Second bullet point:</u> We welcome the Forum’s support for office uses on the QMSC site. However, a ban on large offices is contrary to City Plan Policies 1 and 13 as it does not help promote the city’s business environment. ● <u>Third bullet point:</u> Please note that planning policy cannot control which type of business uses a retail / class E unit, if either independent or chain type. Moreover, it is also not evidence-based that chain businesses can have a negative effect on the vibrancy of an area. This is contrary to City Plan Policy 13 as it does not help promote the city’s business environment. ● As drafted, both bullet points do not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. |
| Par. 15 | <ul style="list-style-type: none"> ● It is unclear what the evidence is to support the statement that the “residential community seems very much cut off from Pimlico”. ● As explained above (for PIM 24 D) there is no justification enough to ban residential uses on the site. It is also unreasonable and impractical to always require large developments to have an identifiable public space at street level which is not shared with people walking and shopping. ● As drafted, Par. 15 does not meet the Basic Conditions (achievement of sustainable development / general conformity with the strategic policies) and should therefore be amended. |

Appendix 2: Comments on other policies of the Pimlico Neighbourhood Plan

| Policy | Comment |
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| General comments (Apply throughout the Plan) | |
| | <ul style="list-style-type: none"> For consistency, always use the same terminology (e.g. the terms “mansards” and “roof extensions” are used in PIM13 B and the terms “mansards” and “upward extensions” are used in PIM3 or “Core Retail Cluster” and “CAZ Retail Cluster” are used interchangeably) not to create confusion. Please avoid the use of acronyms as the casual reader may not understand them. If using them, please add the words to the Glossary. Please reference policies that are in the adopted Westminster’s Development Plan (this includes the City Plan 2019-2040 and the London Plan 2021). If referencing superseded policies, this should be made clear and only done when trying to evidence-base a point. When talking about what residents want for the area, references in footnotes to the Consultation Statement or other pieces of evidence are needed. Please do not use expressions like “residents want”. When referencing data or other figures used to evidence-base a point please reference the source in a footnote. When talking about the area please say “Pimlico Neighbourhood Area” (do not use expressions like the “area” or “Forum area”). |
| Chapter 1: Introduction | |
| Par. 2 | <ul style="list-style-type: none"> Par. 2 should be clarified to explain how the Plan will be used alongside the other adopted plans (e.g. “When made, a Neighbourhood Plan becomes part of Westminster’s <u>Local Development Plan</u>. It sits alongside National Planning policies, <u>the London Plan</u> and Westminster’s <u>City Plan 2019-2040</u> other policies. The policies contained within this Neighbourhood Plan are specific to the area and will be used by Westminster City Council when it determines planning applications <u>within the Pimlico Neighbourhood Area</u>.”) |
| Par. 30 | <ul style="list-style-type: none"> It would be helpful if the Vision also mentioned “listed buildings” and “climate change”. |
| Chapter 2: Delivering a vibrant commercial sector to support our area | |
| Map 2 | <ul style="list-style-type: none"> The map is unclear as it is trying to show too many layers. The key should be updated for consistency: “CAZ core <u>R</u>etail <u>C</u>luster” and say “Queen Mother Sports Centre <u>block</u>”. It would be helpful if the key distinguished which designations are specific to the Plan and which are designated by the <u>City Plan</u>. It is unclear which Unlisted Buildings of Merit and Open Spaces the map is showing. This should be clarified. |
| PIM1 | <p>Clause B:</p> <ul style="list-style-type: none"> We support the designation of the Pimlico Parades. It would be helpful if the policy clearly stated which uses are supported within the Pimlico Parades and how the approach to these centres is different from other centres. <p>Clause C:</p> <ul style="list-style-type: none"> We welcome the Plan manages hot-food take-aways and its potential impacts. However, Clause C is a bit contradictory: hot food takeaways are “generally unsuitable” (first sentence) but can be suitable (second sentence). It is also unclear how Clause C should be applied in the CAZ Retail Cluster. We suggest Clause C is redrafted to be more positively worded and focuses on what needs to be taken into account (any redrafting should also try to not to use words such as “generally” as it weakens the policy). |

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| | <ul style="list-style-type: none"> • <u>Comments on the requirements:</u> <ul style="list-style-type: none"> ○ “a”: Planning policy cannot control refuse disposal outside of the premises. We suggest the second sentence is removed from policy and explained as an encouragement in the RJ. “a” could be more positively worded and ask applicants to mitigate for impacts. ○ “b”: It is unclear what an unacceptable impact is (is it in terms of noise or smell?). Moreover, visual impact should be considered in all cases not just in relation to “heritage buildings”. We suggest “b” is redrafted to be broader (e.g. “appearance and structure of heritage buildings or townscape”). The RJ could explain what kind of ducting is felt to be most appropriate (e.g flues discharging at high-level are preferable in amenity terms, subject to their design/ visual impact be acceptable). ○ “c”: We suggest “a” and “c” are merged to explain how to mitigate impacts and ask applicants to make sufficient provision for parking for deliveries that does not obstruct the pavement. • City Plan Policy 16 C sets outs that any proposals for hot-food takeaways within 200m walking distance from the entrance of a primary or secondary school will not be supported. The Economy and Employment Topic Paper (see document EV_E_002 in the council’s Examination Library) shows how new hot food takeaways would not be supported in most of Pimlico in accordance with City Plan Policy 16 C. We suggest you reference the findings of the paper in the RJ. <p>Clause D:</p> <ul style="list-style-type: none"> • We suggest this sentence is redrafted to be more positive and cover all type of centres including the CAZ Retail Cluster. Clause D could explain that proposals in all town centres should protect residential amenity in accordance with City Plan Policies 7, 14, 15, 16 and 33 and explain that this is particularly important in Local Centres and Parades due to their scale and character. <p>Clause E:</p> <ul style="list-style-type: none"> • Clause E is too restrictive and should be redrafted to be more positive. <p>Clause H:</p> <ul style="list-style-type: none"> • Clause H would sit better under “Heritage impacts” rather than under “Establishing the viability of an existing use”. • Although it is supported and aligns with City Plan Policy 40 B, the last sentence strays into justification and should be moved to the RJ. If to be retained, it should be amended to just require an appropriately designed active frontage, an element of opaque glass may be appropriate/necessary for privacy, regardless of type of windows used at ground floor level / whether it is a shopfront. |
| Par. 3 | <ul style="list-style-type: none"> • To help the reader, please add: “The River Thames” |
| Par. 4 | <ul style="list-style-type: none"> • This paragraph could reference the more up to date Town Centre Health Checks (2019) the council carried out for the CAZ Retail Cluster. |
| Map 3 | <ul style="list-style-type: none"> • We suggest the map is called “Town centre hierarchy”. • Please see comments above (for Map 2). |
| Par. 6 & 7 | <ul style="list-style-type: none"> • Please use the word “designate” instead of “defined”. |
| Par. 15 | <ul style="list-style-type: none"> • It is not considered appropriate for a Neighbourhood Plan to criticise council policy. The Plan should be drafted more positively. |

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| | <ul style="list-style-type: none"> Some sentences in Par. 15 are too subjective and not evidence-based (e.g. sentences about the market). As explained above, if these concerns were identified following public consultation, a reference to the Consultation Statement in a footnote is needed. |
| Par. 16 | <ul style="list-style-type: none"> Please see comments above (for Par. 4). It is unclear what “to meet the shopping and dining needs of the Forum area and the broader catchment area” means. It is also unclear how those needs are not being met and why “visitors” are not mentioned. |
| Par. 17 | <ul style="list-style-type: none"> Par. 17 could be clarified to explain which “other retail and commercial areas” it is talking about. It would be helpful if this paragraph also explained what the City Plan expects from each type of centre. |
| Par. 18 | <ul style="list-style-type: none"> Par. 18 should clearly say which Use Class the text is talking about (e.g. Class E). |
| Par. 20 | <ul style="list-style-type: none"> It is unclear why only certain areas of the centre are suitable for retail, dining and other services that meet the needs of local residents and office and other workers. To be clearly in accordance with City Plan Policy 14 (see paragraph 14.19), the Plan should welcome retail and other complementary town centre uses that make a major contribution towards the strategic functions of the CAZ in the whole centre. CAZ Retail Clusters should not only meet the needs of residents but also of workers and visitors. |
| Par. 21 and 22 | <ul style="list-style-type: none"> The vision to improve the public realm around Warwick Way/Wilton Road is supported. It is unclear how the Forum expects to reduce the stop-start nature of traffic in London. |
| Par. 23 | <ul style="list-style-type: none"> Par. 23 should be redrafted to be more positive and to take into account comments made in relation to PIM1 C. |
| Par. 24 and 25 | <ul style="list-style-type: none"> See comments for Par. 20. |
| Par. 27 | <ul style="list-style-type: none"> The designation of the Pimlico Parades and the policy approach is supported by City Plan Policy 14 (see paragraph 14.24). However, it is a bit unclear how it will work in light of changes to the Use Class Order (e.g. Class E) and Permitted Development Rights as explained above (see comments for PIM1). We also suggest PIM1 better considers this paragraph’s aims. |
| Par. 28, 29 and 30 | <ul style="list-style-type: none"> Please note concerns raised above (for PIM1) in relation to the effectiveness of the approach in light of planning policy changes. Typo: “Where shops have been converted to retail residential it has had a deadening effect”. |
| Par. 31 | <ul style="list-style-type: none"> Par. 21 should be amended to be more positive and to take into account comments made in relation to shopfronts (for PIM 1 H and PIM4). |
| Chapter 3: Design and Heritage | |
| Introduction | <ul style="list-style-type: none"> It would be helpful if the Introduction included more references to the importance of listed buildings and both publicly owned and privately owned trees in the character and appearance of some of the Conservation Areas (e.g. the large London planes in the Garden Squares, glimpses of trees through 'Pimlico gaps' providing a sense of the private realm beyond, and the value of the trees to the setting Lillington and Longmore Conservation Area). |
| Par. 2 | <ul style="list-style-type: none"> Par. 2 should mention that the Conservation Area Audits are published by the council. A link to the website would be helpful. |
| Par. 4 | <ul style="list-style-type: none"> The text should be updated to use the correct terminology: “<u>CAZ</u> Retail Cluster” |

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| Par. 9 | <ul style="list-style-type: none"> The current wording could be misconstrued as implying that visitors are harmful to local businesses. We suggest Par.9 is redrafted for clarity. Par. 9 could further explain which design issues are problematic and how addressing these could support the function of the centre. |
| Map 4 | <ul style="list-style-type: none"> It would be helpful to also include a map showing the designated heritage assets including any listed buildings. The text in Par. 1-9 is very focused on Conservation Areas and Unlisted Buildings of Merit and the Plan should note and have sufficient regard to the need to protect Listed Buildings and their settings in line with statutory duties. Supplementary RJ could reference the new map. |
| PIM2 | <ul style="list-style-type: none"> To be better in accordance with City Plan Policy 39 we suggest you use the word ‘preserve’ instead of ‘respect’. It is unclear how the ‘openness of the skies’ will be assessed. The identified views cover almost all the Neighbourhood Area and it is considered that it is excessive. By being all encompassing, PIM2 is vague and would benefit from identifying more specific views and what it is about them that is special and worthy of protection, such as key focal points, roofscapes and uniformity in façade design. Such focal points within identified views could also be included on a map and accompanied by photographs of focal points within key views. |
| Non-policy guidance | <ul style="list-style-type: none"> It should be clarified what the role of the information in this table is and that it is not to be considered as planning policy. However, some of its elements could be part of a clearer PIM 3 Clause B and include a diagram in an Appendix to support it. “b” – As explained above (for PIM3), the type of mansard design needs to ensure design is consistent with those in the wider terrace in accordance with the City Plan. We suggest it is redrafted (e.g. “Be flat-roofed or double-pitched where this is the prevailing character”). |
| Par. 20 & 21 | <ul style="list-style-type: none"> As explained (for PIM3), we recommend references to the Pimlico Design Guide are removed although drawings from the guide could be attached in an Appendix to illustrate. Also, please note there is no reference to the Conservation Area Audit which includes a map which postdates the audit of where roof extensions may and may not be acceptable). |
| Par. 24 | <ul style="list-style-type: none"> Policies in this Plan are more prescriptive than policies in the City Plan. In this sense, it is not considered that policies in this Plan represent a “liberalisation”. As explained below (for Chapter 4), the need for family housing in Pimlico needs to be evidence-based. |
| PIM4 | <p>Clause A:</p> <ul style="list-style-type: none"> To be better in accordance with City Plan Policy 39 we suggest you use the words “preserve and enhance” instead of “respect”. <p>Clause B:</p> <ul style="list-style-type: none"> Clause B seems to relate to views of the open spaces between the rear elevations of terraces that are visible from street views. This could be supported by an illustration/photograph for clarity of the type of context to which this clause would relate. It appears a photograph on page 26 shows an example of the open aspect and return frontage to which Clause B might relate. <p>Clause C:</p> <ul style="list-style-type: none"> Clause C is also unclear as to the features it is referring to and could be supported by an illustration/photograph of examples of the townscape feature it is describing for clarity. <p>Clauses H&I:</p> |

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| | <ul style="list-style-type: none"> • Clauses H&I are welcomed. However, in some circumstances, depending on the prevailing character within a street, some infilling, for example beneath the entrance bridge may be considered acceptable so we suggest Clause I is amended to take it into account (e.g “where it can clearly be demonstrated that they do not have a detrimental effect on the sense of openness between the street and the front elevation of the building or where they reflect prevailing character. ‘ |
| PIM5 | <ul style="list-style-type: none"> • PIM5 should be titled ‘Peabody Avenue Conservation Area’ and refer to the CA by this title within the policy wording to avoid confusion with the Peabody Estates South Westminster Conservation Area which lies outside of the Pimlico Neighbourhood Area. • To be better in accordance with City Plan Policy 39 we suggest you use the words “preserve and enhance” instead of “respect” instead of making a “positive contribution”. • PIM5 could go further and aim for the protection of some characteristics of the original buildings within the Conservation Area such as windows and doors, for example. |
| PIM6 | <ul style="list-style-type: none"> • To be better in accordance with City Plan Policy 39 we suggest you use the words “preserve and enhance” instead of “respect” instead of making a “positive contribution”. |
| PIM 7 | <p>Clause B:</p> <ul style="list-style-type: none"> • The Plan needs to be clearer in relation to what is being protected: is it the Arcade or its use? |
| Par. 42 | <ul style="list-style-type: none"> • The housing need for family-sized accommodation in this location needs to be evidence-based. • We suggest that instead of saying that housing should not be designed for people that are in Pimlico only for a short time, the Plan explains the issue with short-term letting and how it should be avoided on site. |
| PIM8 | <ul style="list-style-type: none"> • PIM8 should be titled ‘Unlisted Buildings of Merit’. • We suggest you do not use words such as ‘important’ as the policy does not need to explain why they are being designated (the importance is outlined in Appendix 3 of the Plan). • The UDP policies have been superseded so PIM8 should be updated to reference City Plan Policy 39. • “a” – We support the designation of Unlisted Buildings of Merit. • “b” – PIM8 should include a list or map of telephone boxes, with evidence to justify why they should be protected. However, it should be noted that when there are issues of anti-social behaviour or states of disrepair some telephone boxes may need to be removed. Moreover, telephone boxes are often allowed to be placed upon the pavement without planning permission, through permitted development and a condition of this permitted development is that once the telecommunications use ceases, the equipment must be removed. Therefore, there is a requirement on telecoms companies to remove telephone boxes when they are no longer required for communications purposes to comply with the requirements of the GPDO. If a list is attached and “b” is to be retained, “b” and the RJ should explain that the phone boxes could be removed. We suggest “b” is redrafted to explain when telephone boxes should be retained and why (e.g. as a townscape feature) and how they could be used. the RJ should note that the change of use would need planning permission. |
| Par. 43 | <ul style="list-style-type: none"> • Conservation Area Audits are clear in relation to the buildings being designated as Unlisted Buildings of Merit. |

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| Par. 44 - 51 | <ul style="list-style-type: none"> • Pars. 44-51 should be amended to consider comments for PIM9 and the Non-policy guidance. These paragraphs are not positively worded. |
| PIM10 | <ul style="list-style-type: none"> • We suggest the first sentence is redrafted so it is clear where it applies (e.g. “to non-residential-commercial premises (including hotels) should demonstrate high quality design and retain or enhance the character of the shopping-commercial frontage”). Please note hotel signage, for example, may not have a typical shop frontage. • “a” - If it is intended to roll-back bad signage, we suggest this is made explicit (e.g. “Where an application is made for new advertisements, the opportunity must be taken to replace displays harmful to visual amenity (such as internally illuminated plastic-faced signs) with ones more in keeping with the character and appearance of the building and surrounding area.)” • “b” – We suggest you use the words “conserved”, “enhanced” and “sensitively integrated” instead of “protection” and “restorations”. • “c” – This is very prescriptive and detailed explanation and examples of what would be acceptable should be moved to the RJ. Moreover, standards may change overtime and the policy would become outdated. • “d” – It is unclear what would happen if a planning application proposed “external shutters”. Would it be refused? |
| PIM12 | <ul style="list-style-type: none"> • It is understood from the RJ that part of the intention of PIM12 for replacement of buildings that are considered to make a negative contribution is to allow for some flexibility in design in order to allow clear differentiation between these sites and more historic buildings to allow it to be memorised where former bomb sites where located. However, the last part of PIM12 is vague and unclear. We suggest this is amended to ensure that any design approach preserves and enhances the Conservation Area. • It would also be helpful to include a list/map of such buildings in an Appendix. |
| Chapter 4: Housing and hotels | |
| Par. 3 | <ul style="list-style-type: none"> • Par. 3 could explain why the statistics are “striking”. How do those figures differ from the figures in other boroughs or areas in the country? |
| Par. 4 | <ul style="list-style-type: none"> • Par. 4 should explain that the mentioned issues were issues raised during the consultation process and a reference in a footnote is needed. If there is evidence and data that shows and illustrates those trends, it should be explained here. • The link between having a “transient” population and bad waste management is unclear. Please also note that some of the issues highlighted are not planning policy issues (e.g. waste arrangements). • It is unclear who are considered to be key workers or not. • It is unclear how the Forum knows that “younger private tenants” contribute to a “lack of permanence”. |
| Par. 5 | <ul style="list-style-type: none"> • Please note that some of the issues highlighted are not planning policy issues (e.g. waste arrangements). • It is unclear how the Forum knows that Pimlico suffers more than other areas from short-term letting. We suggest you check Inside Airbnb and pull out some data for Pimlico to evidence-base the statement. |
| Par. 7 | <ul style="list-style-type: none"> • Typo: “are best addressed by plans policies in the City Plan”. |
| Par. 8 | <ul style="list-style-type: none"> • It is unreasonable to state that housing stock should be mainly attractive to “longer term residents”. In line with City Plan Policy 12, all new homes and residential extensions should be designed to a high quality and storage space should be provided in line with the NDSS. • Any evidence papers that show that Pimlico has poor quality housing stock should be referenced in a footnote. |

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| Par. 9 | <ul style="list-style-type: none"> Any evidence papers that show that Pimlico has a shortage of family housing (and too many 1 and 2 bedrooms units) should be referenced in a footnote. Local housing need evidence is needed to support these statements. The third sentence is contradictory: if the policy only allows extensions to be linked to an existing unit to create larger units, this is not increasing the number of houses. It is unclear what the words between brackets in the last sentence mean and how this policy is allowing families to downsize. |
| Par. 15 | <ul style="list-style-type: none"> If there is evidence and data that shows and illustrates those trends, it should be explained here. As explained above (for PIM15), planning policy cannot control allocation and Westminster (and therefore Pimlico) have a need for all types of housing and the council has already identified high-level groups of <u>key workers</u>. The council has a set list of established priorities that it follows when allocating affordable homes and this cannot be influenced by a Neighbourhood Plan. We suggest all references to allocation of homes and key workers are removed. |
| Par. 16 | <ul style="list-style-type: none"> Please note City Plan Policy 9 also requires social housing to be delivered as part of housing development. Par. 16 should explain that development will need to follow the tenure split set out in the City Plan– any deviation from the split should be evidence-based. |
| PIM16 | <p>Clause A:</p> <ul style="list-style-type: none"> Although we welcome the support of hotel refurbishment, the RJ should note that very often refurbishment works do not need planning permission. The RJ could reference City Plan Policy 15 H that explains how the council expects hotels to be upgraded. <p>Clause B:</p> <ul style="list-style-type: none"> Although we welcome the support for conversion of hotels back to residential use, City Plan Policy 15 F welcomes such conversions even if they do not reinstate family-sized homes. We suggest you redraft Clause B to welcome conversions of hotels “back to the building’s original use”. We would also welcome the conversion if it was to reinstate several flats. <p>Clause C:</p> <ul style="list-style-type: none"> We suggest Clause C is more positively worded and that it sets out where hotels may be acceptable in accordance with City Plan Policy 15 G. Any rephrasing should avoid ambiguous terms such as ‘adjacent’, as this could make the policy ineffective. |
| Par. 20 | <ul style="list-style-type: none"> It is unclear what “larger” and “smaller” hotels are. This should be defined in the Glossary. |
| Par. 21 | <ul style="list-style-type: none"> The Plan could reference City Plan Policy 8 and its RJ about short-term letting. |
| Chapter 5: Open Spaces, Pedestrian and Transport Facilities, Protecting the Environment | |
| Par. 1 | <ul style="list-style-type: none"> It is unclear which “four garden squares” the paragraphs refers to. |
| PIM18 | <ul style="list-style-type: none"> We suggest the policy title is changed as the policy does not only deal with “public open spaces”. <p>Clause A:</p> <ul style="list-style-type: none"> We welcome Clause A. However, the first and last sentences are contradictory as one suggests the spaces should be used by residents and the other one suggests the spaces should be open up to visitors. We suggest Clause A is redrafted to clearly be in accordance with London Plan Policies S4 and G4 and City Plan Paragraphs 34.4 which support play space and open space being publicly accessible. <p>Clause B:</p> |

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| | <ul style="list-style-type: none"> • It is unclear what “accessible to the community” means. Is it accessible in terms of wheelchair accessibility, for example, or in terms of opened to the public? This should be clarified. • Clause B could go further and ask the reprovision of play space is within no more than 5-minues walk of the existing site and to encourage new play space in deficiency areas. • The first part of the sentence strays into justification and is not needed. |
| Par. 5 | <ul style="list-style-type: none"> • Par. 5 could reference the City Plan (see Figure 27) which shows how parts of Pimlico are an Area of Play Space Deficiency. |
| Par. 6 | <ul style="list-style-type: none"> • It is unclear what a “formal” open and green space is. |
| Map 7 | <ul style="list-style-type: none"> • It is a unclear which Public Open Spaces the map is showing and some of the open spaces shown are not public. This should be clarified. |
| PIM 19 | <p>Clause A:</p> <ul style="list-style-type: none"> • We welcome Clause A. However, some of the suggested measures relate more to the management and maintenance of the public highway than to the land use planning system (which is what the Plan should be concerned with). It is also unclear when this policy will apply. • It should be noted in the RJ that highways works carried out by the council do not often require planning permission and, in many cases, new development will not present opportunities to remove redundant street furniture. • We suggest Clause A opening sentence is redrafted to be more positive and that references to vehicle parking are removed as unnecessary (please also note some parking provision may be necessary in some occasions). • <u>Comments on the requirements:</u> <ul style="list-style-type: none"> ○ “a”- Some phone boxes are listed and if not listed and no longer in use they could be removed under the terms of the GDPO (see comments for PIM8). “a” should be amended to be more positive (e.g. work with BT and utility providers to seek removal of...). ○ “b” - It is unclear how it will be assessed if “they are no longer required”. As above, we suggest “b” is rephrased to be more positive and acknowledge that the removal or relocation of cabinets is often outside of council’s control. <p>Clause B:</p> <ul style="list-style-type: none"> • We welcome the designation of the Pimlico “piazzas”. However, it is unclear what the “paved areas” and the “additional areas” are. <p>Clause C:</p> <ul style="list-style-type: none"> • We welcome Clause C. We suggest you do not use words such as “generally” (it weakens the policy). • The policy could also mention the importance of greening (including trees), biodiversity, etc. • We suggest you use the words “electric vehicle charging points” (they may be private or public) instead of “public vehicle charging points”. |
| Par. 10 to 15 | <ul style="list-style-type: none"> • We welcome these paragraphs and will continue to work with the Forum and other stakeholders to improve the mentioned areas. • Par. 15 should clearly reference Map 7. |
| PIM20 | <ul style="list-style-type: none"> • This policy is very detailed and strays into strategic matters better dealt with by the City Plan. We suggest you redraft the policy so it is more generic as if a proposal for a bridge from another place rather than Nine Elms came forward, the policy would not apply. • <u>Comments on the requirements (please use letters as done for other policies):</u> |

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| | <ul style="list-style-type: none"> ○ “First bullet point” - This is welcomed (although all open space is already protected). City Plan paragraph 31.8 does not only not permit a loss of open space but would require a positive contribution if a new bridge was to be built. It is unclear what “compromise the operation of existing users in the area” means. We suggest this is redrafted to be in accordance with City Plan Policy 31. ○ “Fourth and fifth bullet points” - These points stray into non-land use matters. It is also difficult to know how they will be enforced. As drafted, these paragraphs read as if more people walking and cycling in Pimlico was a problem (this would be contrary to City Plan Policy 25). We suggest these paragraphs are merged and redrafted to be more positive. |
| PIM 21 | <p>Clause A:</p> <ul style="list-style-type: none"> ● Clause A is welcomed as it aligns with City Plan policies. It is however unclear what the “open feel of the area” and “the areas of public realm” are and how it will be implemented. <p>Clause B:</p> <ul style="list-style-type: none"> ● Clause B is welcomed as its principles align with City Plan policies. Pimlico Gardens are protected by City Plan Policy 34 and PIM17A. Development in the area would only be permitted under certain circumstances and will need to maintain or enhance the value of the Gardens. ● Clause B welcomes “community uses” and “activities complementary to the boating base”. It is unclear which uses would be welcomed. It should also be clarified what “very small scale” means. Please note some designations may preclude new uses on this site. |
| Par. 16 | <ul style="list-style-type: none"> ● Par. 16 should be updated to take into account the approach to riverside development in the City Plan 2019-2040 (see City Plan Policy 31). |
| Par. 19 | <ul style="list-style-type: none"> ● Par. 19 should explain that the mentioned issues were issues raised during the consultation process and a reference in a footnote is needed. Paragraphs that support PIM20 should perhaps come before the ones that support PIM21. |
| Par. 21 | <ul style="list-style-type: none"> ● Par. 21 is unclear. It reads as if the Plan is arguing for road widening so there is less space for pedestrians/cycling and more space for cars and parking, which is contrary to City Plan Policies 25 and 28. The council would not support reallocation of highway space from non-motorised uses to motorised vehicles. We suggest it is redrafted so it can be clearly interpreted. |
| Par. 22 | <ul style="list-style-type: none"> ● The link between population increases and pavement space is unclear. ● The source is needed in a footnote. |
| Par. 23 | <ul style="list-style-type: none"> ● Statements like this one need to be evidence-based. The source is needed in a footnote. ● Par. 23 is unclear. What is it trying to explain? |
| PIM 22 | <ul style="list-style-type: none"> ● The council welcomes the Forum’s vision for the Wilton Road/Warwick Way junction. We suggest it goes further and explores opportunities for greening. ● It is unclear what the “shopping area” is (it is the “CAZ Retail Cluster”)? ● Clause B could include “or have an adverse impact on residential amenity” to be stronger. ● The RJ could note the need for 2m width of unobstructed pavement is required. |
| Par. 25 and 26 | <ul style="list-style-type: none"> ● The RJ should note that some of the identified problems cannot be addressed by planning policy. |

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| Par. 27 | <ul style="list-style-type: none"> • Please note some of the ideas are supported but are cannot be addressed by planning policy. • <u>Comments on the Wilton Road project:</u> <ul style="list-style-type: none"> ○ <u>2nd bullet point:</u> It is unclear who would pay the landlords. We suggest you delete this as unreasonable. ○ <u>3rd bullet point:</u> Parking is a strategic matter that is better dealt with by the City Plan. We suggest you do not use words such as “perhaps” as it weakens the idea. This sentence is, however, unclear. ○ <u>4th bullet point:</u> It is unclear who will fund new signs. We suggest you delete this as unreasonable. |
| PIM23 | <ul style="list-style-type: none"> • The aims of the policy are welcomed as the London Plan and City Plan aim for the reduction of carbon emissions. PIM23 is however overly complicated and prescriptive and sets out a different approach to the one set out in London Plan Policy S12 and City Plan Policy 36. The deviation from the Mayor’s Energy Hierarchy should be supported by a clear evidence base. We suggest PIM23 is redrafted to explain how Pimlico can contribute to meeting Westminster’s energy reduction targets and to tackling the Climate Emergency. The policy could also mention other sustainability / air quality causes and concerns. <p>Clause A:</p> <ul style="list-style-type: none"> • It is unclear what “Zero Local Emissions” means (this should defined in the Glossary and the RJ should explain how it will be assessed by officers), to which types of development it applies and how it will be demonstrated by developers. • Please note it is too onerous to require all development to be zero carbon and this is contrary to City Plan Policy 36 (e.g. what would an application for a rear extension need to do to contribute to the reduction of emissions?). City Plan Policy 32 sets out the policy approach to be followed in Westminster and the issue is more extensively explained in the London Plan – please note the Mayor of London will also be consulting on and publishing guidance documents related to air quality this Autumn. These will be used as the basis of assessment in Westminster. We suggest Clause A is redrafted to take this into account and ensure the same approach is followed across the city. <p>Clause B:</p> <ul style="list-style-type: none"> • It is unclear how Clause B relates to development and how it will be implemented. Please note the issue is also dealt with by City Plan Policy 36. We suggest Clause B is redrafted to apply to new buildings and/or encourage owners to improve the energy efficiency of their homes or buildings. The RJ could reference the council’s draft Environment Supplementary Planning Document (and its retrofitting section). <p>Clause C:</p> <ul style="list-style-type: none"> • The first half of this clause repeats the requirement to minimise energy use and maximise renewable energy from Clause B. • It is unclear what “medium development and substantial refurbishment” are, meaning it cannot be effectively implemented. This should be defined in the RJ which should also recognise that many refurbishment works do not need planning permission. • It is unclear if the “energy used from renewable sources” is from on-site technology or external supply to the building’s occupiers. • Clause C broadly aligns with City Plan Policy 36. However, it is not fully in accordance with the Mayor’s Energy Hierarchy (which aims to minimise energy demand) nor the requirements of City Plan Policy 36 which set out targets for on-site reduction to achieve the zero-carbon target. Development should achieve these targets instead of using the existing building as a baseline. |

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| | <ul style="list-style-type: none"> • <u>Comments on the requirements:</u> <ul style="list-style-type: none"> ○ “a” - This again repeats the requirement to minimise energy use and maximise energy efficiency. ○ “b” - The wording and example are unclear. The wording should be amended for renewable energy systems to be sited and operated to maximise energy efficiency. This maximises the impacts of renewable energy systems which is implied to be the intention of this clause. ○ “c” - Although the intention is understood, the wording used is confusing. To resolve this ‘a’ could be expanded to apply to both regulated and unregulated use. This will be a local requirement that goes beyond existing policy. However, a strong evidence base and justification for this approach is needed. ○ “e” – The policy wording is unclear. If this is about onsite battery storage used to store excess renewable electricity generated onsite so that it can be used at a later time, we suggest the sentence is redrafted to read “from on-site sources” and not “off-site”. ○ “f” - It is unclear what “future-proofed” and “where practical” mean here. • Clauses D & F: <ul style="list-style-type: none"> • It is unclear which “sustainability standards” should be met. • Clauses D & F are technology-specific and do not allow for new technology coming forward. Please note that the ambition is to ban domestic gas boilers within the lifetime of the Plan. |
| Par. 30 | <ul style="list-style-type: none"> • The source is needed in a footnote. This type of statements should be supported by evidence. |
| Chapter 6: Larger sites including the Queen Mother Sports Centre Block | |
| Map 8 | <ul style="list-style-type: none"> • The block includes the terrace on Gillingham Street, to the north of the site, which is wholly Grade II listed. The block also includes 74-77 Wilton Road and 2-22 Upper Tachbrook Street to the southern corners of the site, which are within the Pimlico Conservation Area. We suggest these buildings are not included within the boundary as it may be interpreted as they were suitable for redevelopment. • The map should explicitly show which Listed Buildings and Conservation Areas can be found in the vicinity of the block and PIM24 D could explain how development should take it into account. |
| Par. 3 to 8 | <ul style="list-style-type: none"> • These paragraphs are often too subjective. |
| Par. 10 | <ul style="list-style-type: none"> • <u>First bullet point:</u> <ul style="list-style-type: none"> ○ We suggest you do not use words such as “interesting” as they are unclear and very subjective. ○ When you mention specific buildings, we suggest you use the address as the businesses that are located within them may vacate the property at any time and the Plan would therefore be inaccurate (e.g. Patisserie Valerie building). • <u>Fourth bullet point:</u> It is unreasonable to say that a street is suitable only for “less profitable” business. |
| Par. 11 | <ul style="list-style-type: none"> • It is unclear what “become a destination” means. We suggest you redraft Par. 11, so it is more positive. The link between traffic and attracting new public is also unclear. |

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| Par. 12 and 13 | <ul style="list-style-type: none"> • These paragraphs are often too subjective. • As mentioned above (for Par.10), when you mention specific buildings, we suggest you use the address. |
| PIM24 | <ul style="list-style-type: none"> • No evidence is clearly provided to justify different approaches to development in different parts of Pimlico. It is unclear what Clauses A-C add to the Plan and the City Plan, as both Plans already contain policies that will ensure development in Pimlico is adequately managed. <p>Clause A:</p> <ul style="list-style-type: none"> • The RJ should note that refurbishment and demolitions works do not always need planning permission. As national planning policy already covers what “development” is, it is not necessary to explain what major development is in Clause A. • <u>Comments on the requirements:</u> <ul style="list-style-type: none"> ○ “a”: The reference to “and all other relevant material considerations” is not needed and should be removed. It is too onerous to always require development to “enhance” residential amenity (this is contrary to City Plan Policy 7). ○ “b” – We suggest you use the word “conserve” instead of “preserve” in line with City Plan Policy 39. It is unclear what the “open skies” are and how it will be assessed. ○ “d” – It is unclear what “routed through the site” means. Do all new major development need a route through it? <p>Clause B & C:</p> <ul style="list-style-type: none"> • It is unclear where Clauses B and C will apply (“sites adjacent to the riverside” and “around or adjacent to Pimlico station are very broad). It would be helpful to know if the Forum has identified any sites that could host a major development in these areas. • It is unclear what a “barrier wall effect” and “high development” mean in Clause B. • Listed buildings and sculptures are already protected and managed by other policies: it is unclear how PIM24 can protect it further. |
| Appendix 1 | |
| <ul style="list-style-type: none"> • Map 9 does not have dates. Is it Pimlico in 2021? • It is unclear what Map 10 is showing. • It is unclear what the Illustrative view is showing. Is it Pimlico in 2021? Are the building heights correct? Note the top end of Wilton Road for example where there are buildings greater than 11m. | |
| Appendix 2 | |
| <ul style="list-style-type: none"> • We recommend the table is moved to a different document and is part of an Evidence Base paper. The paper should explain the rationale behind the Plan’s hierarchy and the methodology used to determine if a centre is green/amber/red. The centres will change over time and the status will therefore be out of date as centres evolve. The table will therefore need to be updated (which can be more easily done outside of the Plan which would require re-examination for any changed to be published). • To recognise the mixed-use character of these areas, we suggest the Appendix is called “Town Centres” instead of “Retail and commercial areas”. • Please use the terminology in accordance with the City Plan (e.g CAZ Retail Cluster and not Retail Cluster). It is fine to divide the centres in different portions to carry out the health check / analysis. However, it should be clarified that they do not form centres themselves. • It would be helpful if the text recognised some centres are split between Pimlico and other Neighbourhood Areas (e.g. Lupus Street). | |

- Appendix 2 should explain that the Tachbrook Street Market is not part of the CAZ Retail Cluster.
- It would be helpful if Appendix 2 contained a map showing the different land uses within the Town Centre Hierarchy but also outside of it / in the vicinity to provide context (e.g. around Lupus St or Vauxhall Bridge Road).

Appendix 3

- Map 6 which shows the location of the Unlisted Buildings of Merit referenced in PIM8. It also identifies two unlisted Giles Scott telephone boxes and Russell House, however these have not been included within Appendix 3. It is unclear if the Plan is designating them, and it should be clarified.
- As aforementioned (for PIM 8), all telephone boxes which are proposed to be designated as heritage assets should be evidence based and their locations should be identified on the map and an explanation included within the Appendix.
- The date for 137 Grosvenor Road is unclear.

Glossary

- **CAZ:** Amend 'Forum Area' to 'Pimlico Neighbourhood Area' for consistency.
- **CAZ Retail Cluster:** We suggest that you simplify the definition and omit references to the streets as this seems overly complicated for the purposes of a definition whilst it misses out key streets that are part of the centre. Streets that form the cluster are already clearly shown on maps so it does not need to be repeated. The definition could describe the activity of the cluster, to align with the City Plan Glossary definition.
- **Designation:** We suggest this is deleted as too broad.
- **Family Accommodation:** The definition should reflect the City Plan Glossary definition on Family Housing that notes for affordable housing, units with two bedrooms may be suitable for families in certain instances with consideration on waiting list need and size of housing units. We suggest the second sentence of the definition is deleted as a definition should not justify need for family housing (this is addressed in policy).
- **Historic Stock:** We suggest this is deleted as too broad.
- **Local Centres:** The definition could describe the activity of the centres, to align with the City Plan Glossary definition.
- **Major Development:** This definition reads somewhat convoluted and has a few inaccuracies as it does not clearly include account for non-residential development. For clarity and accuracy this definition reflects the City Plan Glossary definition.
- **Pastiche Development:** It might be useful to expand the definition to clarify it is imitation of a particular architectural style, design or historical period.
- **Pimlico Forum Area:** Amend 'Pimlico Forum Area' to 'Pimlico Neighbourhood Area' for consistency.