

Neighbourhood Planning  
Policy and Projects  
Westminster City Council  
Westminster City Hall, 17th Floor  
64 Victoria Street  
London SW1E 6QP

23<sup>rd</sup> August 2021

Via e mail to [neighbourhoodplanning@westminster.gov.uk](mailto:neighbourhoodplanning@westminster.gov.uk)

Dear Sir/ Madam,

## NETWORK RAIL

### RESPONSE TO CONSULTATION ON DRAFT 'REGULATION 16' PIMLICO NEIGHBOURHOOD PLAN

We are writing to you on behalf of our client Network Rail following the publication of the 'Regulation 16' version of the draft Pimlico Neighbourhood Plan for consultation.

#### Network Rail and Future Victoria

Network Rail is currently working in partnership with Westminster Council, Victoria BID, the GLA, TfL, landowners and the local community to develop 'Future Victoria', a new concept masterplan for the area around and behind Victoria Station.

The majority of the masterplan area falls within the Victoria Opportunity Area, which is outside the geographical scope of the emerging Pimlico Neighbourhood Plan. The masterplan area does however include currently operational railway land to the south of Warwick Way and west of Peabody Avenue, which does fall within the Pimlico Neighbourhood Plan area (see map overleaf). That land falls outside the Pimlico and Peabody Avenue Conservation Areas.

An architect-led team has been commissioned to look at the area as a whole and set a framework which guides future change for the benefit of all. The projects key aims are:

- Make the station and interchange easier to use
- Improve the quality of the streets and spaces around Victoria Station
- Set out a framework which guides good growth so that it brings benefits to the area
- Change perceptions of Victoria, making it a place that you want to go to.

Next year, the Future Victoria project team will be holding a series of engagement meetings and workshops to ensure that the views of the residents, businesses, visitors and partners form part of a future vision and masterplan for the area.

With respect to the Network Rail owned land that lies within the Neighbourhood Plan area, it is intended to bring this land forward in due course for residential-led mixed use development. Given the characteristics of the site and the pressing need for housing within the borough and London, a high-density development is anticipated that delivers considerable public benefits.



*Map of the Victoria Master Plan Area*

### **Response to Draft Objectives and Policies**

Network Rail is broadly supportive of the overarching objectives for Pimlico as set out in the draft Neighbourhood Plan and recognises the special character of the Pimlico area as set out in that plan. It is however crucial that a balanced approach is taken to enable the delivery of a continued supply of flexibly sized accommodation for business and the delivery of housing in line with adopted Westminster City Plan policies.

To this end, whilst we welcome many aspects of this emerging plan, we do consider there are some areas where amendments are necessary in order to better facilitate the achievement of these objectives, deliver the public benefits and make best use of the land. We set out our response in relation to those areas of the plan below.

#### **Policy PIM11 – Tall Buildings**

By way of context, we consider the supporting text at paragraph 41.3 to City Plan policy 43 (Building Height) is particularly relevant here. This states that the impact of a building's height is dependent on its context. An eight-storey building may be perceived as tall in one area, but not in another. This policy therefore follows a context-based approach to tall buildings, which considers the prevailing height of the surrounding areas.

We note policy PIM 11, part C sets reference heights for new buildings above street level for various parts of the Conservation Area. It is however important such reference heights are not unduly rigid in the context of City Plan policy 43 given the variations in built form in (and also adjacent to) various parts of the Neighbourhood Area.

We therefore welcome the element of flexibility afforded by policy PIM 11, part A, which states that any proposal over the reference height of the local area must preserve protected townscape and views, the setting of any listed building or unlisted building of merit or and the setting and key features of any conservation areas. We however question the necessity of the inclusion of part B of policy PIM 11 (which states that any part of the structure higher than the reference height should aim to be subordinate to the main lower part of the building) in the context of parts A and C, which when applied together would allow for a more subjective and case by case assessment of the impacts of new development. The policy should be revised to also recognise that new points of interest and positive townscape views can be created by the introduction of appropriately located and designed taller buildings. In this instance the Neighbourhood Plan may have been written without knowledge of the need and the potential for the Network Rail site to come forward within its intended timescale.

#### **Housing Development (Policies PIM 13 – PIM 15)**

We note the introductory section to chapter 4 (Housing and Hotels) summarises concerns raised by local people regarding the availability and affordability of housing in Pimlico.

We also note the draft housing related policies focus on specific issues in relation to housing design and quality (PIM 13 – PIM 14) as well as the provision of family sized affordable housing and intermediate housing for key workers.

In addition, particularly in the context of the existing significant challenges and issues in relation to housing in Pimlico, we do however consider it would be appropriate for the Neighbourhood Plan to more specifically reflect the objectives of policy 8 (Housing Delivery) of the new City Plan. The supporting text to that policy at paragraph 8.1 sets out the necessity of fully optimising the delivery of new housing provision across the city. Westminster's Spatial Strategy (City Plan policy 1), which amongst other objectives sets out a challenging target for the delivery of new homes for the period up until 2040, is also especially relevant here.

Overall, we are mindful the Neighbourhood Plan in its production, has not had the benefit of understanding the townscape and regenerative impacts that the Network Rail land would have both locally and its role in facilitating improvements to the wider area. It is important that the Plan does not progress in its current form in order that a coordinated approach with the wider Victoria masterplan can be achieved.

We look forward to being kept updated on the ongoing progress of the Pimlico Neighbourhood Plan. In the meantime, if you require any additional information or wish to discuss further, please do not hesitate to contact me.

Yours faithfully



**GRAHAM TIMMS**  
**Associate Director - Planning**