

# CITY PLAN 2019 - 2040

## Statement of Common Ground between City of Westminster and Network Rail

November 2024

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# 1 Introduction

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# 1.1 Executive Summary

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- 1.1.1 This Statement of Common Ground has been prepared between Westminster City Council and Network Rail. It focusses on the issues raised by Network Rail in their response to Regulation 19 consultation. It has been prepared in recognition of Network Rail's role as a landowner and infrastructure provider.
- 1.1.2 The statement is intended to minimise the areas of contention, and summarise each party's position where areas of disagreement remain. It demonstrates collaborative working between all parties and sets out where common ground has been reached since the closure of Regulation 19 consultation, including through some minor modifications that all parties agree to.

# 2 Background

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## 2.1 Background

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- 2.1.1 The current City Plan was adopted in April 2021 however there has since been a change in political administration (local elections 2022). Subsequently, the council now have new priorities for the local plan with regard to affordable housing and retrofitting. A partial review of the adopted City Plan that focusses on these issues, and introduces a small number of site allocations, therefore commenced in late 2022.
- 2.1.2 Given their landowner role, the council have engaged with Network Rail through the development of the City Plan Partial Review, with a particular focus on the site allocations at Grosvenor Sidings.
- 2.1.3 As set out in their Regulation 19 responses, Network Rail support the inclusion of Grosvenor Sidings as a site allocation, and the general approach to land uses and development parameters within the draft allocation. Network Rail do however raise a number of detailed matters for this site. The statement also covers other matters raised in relation to infrastructure provision.

# 3 Policies in the Partial Review

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## 3.1 Grosvenor Sidings

Issue raised at Regulation 19 and/or through proposed modifications	Council position (including proposed modification where relevant)	Network Rail position
Core principle D more rigid than what is set out in the NPPF. Paragraph 201 of the NPPF refers to 'minimising' conflict and therefore encourage the council to include this reference within the policy.	Paragraph 201 of the NPPF states 'avoid or minimise' which gives stronger importance to heritage and context. The council must also balance representations made by Pimlico Neighbourhood Forum and Historic England if there is potential significant dilution of the importance of heritage.	Agree to remain as is.
Due to the need to balance consultation responses from other parties, including statutory consultees, some proposed modifications have been made to the policy.	<p>This includes for core principle D as follows:</p> <p><i>Proposals should be designed in a way that respects and responds to the local context, <b>sustaining and/or and conserves and enhancing views to adjacent the significance of heritage assets and Conservation Areas, along with and strategic and local views.</b> Proposals should also sensitively repurpose the on-site listed 123A Grosvenor Road building and adjacent workshop building;</i></p> <p>This is to ensure better alignment with adopted Policy 39: Westminster's Heritage and with the NPPF.</p>	Agree with proposed modification.
Whilst core principle E is supported, at this stage until a design is proposed for the site, this cannot definitively be confirmed and it is suggested that the wording is amended for the opportunity to be explored as opposed to definitively delivered. It is	The council would like more certainty that permeability will be enhanced as a key feature for delivering this site and would not want to weaken this aspect of the policy. The council does accept though, that the direction of travel to achieve enhanced permeability on site can be	Agree with proposed modification.



<p>suggested that principle E of the policy is updated as follows <b><i>“Explore the opportunity to enhance permeability through the site and beyond, providing access routes north to south from the River Thames to London Victoria Station and east to west through adjacent residential estates.”</i></b></p>	<p>‘explored’. Consider re-wording to:</p> <p><i>Enhance permeability through the site and beyond, <b>providing. This could include the provision of access routes north to south from the River Thames to London Victoria Station and east to west through adjacent residential estates.</b></i></p>	
<p>Agrees in principle that the site represents <i>“an area that provides opportunities for new development that can deliver high quality homes and supporting uses that meet a range of other policy objectives, including job growth, new public open and green spaces, enhanced permeability and improved public realm...”</i> however, the existing transport infrastructure on Grosvenor Sidings is vital for current operations and the opportunity to make better use of land for development purposes is subject to a plan for consolidating / relocating critical I transport infrastructure.</p>	<p>The council agrees and suggests re-wording paragraph 11.3 of the supporting text to the policy to strengthen this point:</p> <p><i>Grosvenor Sidings to the east and Pugs Hole Sidings to the west currently operate as sidings/ depots for trains, supporting the operations of the Chatham and Brighton mainline serving to and from London Victoria Station. <b>To facilitate any redevelopment As part of proposals for the site, it is envisioned that the sidings, as a critical form of transport infrastructure, will be relocated elsewhere on the network and continue to serve the London train network. In addition, to the west of the site resides the current Ebury British Transport Police building which will seek to be retained or re-provided as part of development plans for the site, or where an appropriate alternative location is secured.</b></i></p>	<p>Agree with proposed modification.</p>
<p>Whilst it is recognised within the supplementary text that the sites include both Grosvenor Sidings and Pugs Lane, it is requested that the policy itself is explicit and clarifies that the Grosvenor Sidings</p>	<p>The council feel this is sufficiently clear within the supporting text to the policy with little benefit of including within the policy as this would not preclude the site from coming forward as one or in a phased manner. Suggest re-wording to make this clearer</p>	<p>Agree with proposed modification.</p>

<p>allocation includes Pugs Lane. It is likely that both sites will come forward independently, within different timescales which needs to be reflected in the policy to ensure both sites come forward together but also independently if required.</p>	<p>within paragraph 11.2 of the supporting text:</p> <p><i>Overall, however, the vision and core principles should be reflected across the site allocation as a whole to ensure the delivery of a new place that benefits residents, workers and visitors and that responds to its local context. , regardless of if development across the site comes forward simultaneously or independently.</i></p>	
<p>Paragraph 11.4 of the supporting text refers to London Plan policy and the expectation to provide 50% affordable housing where the site is in public ownership. This will ultimately need to be balanced against the significant substantial infrastructure costs associated in order to facilitate future development on this site.</p>	<p>The council are agreed with this as the starting point for the policy (as referred to elsewhere in the existing adopted City Plan) and will be appropriately assessed and determined as part of the planning application process. Therefore, the council suggest no changes to the policy or supporting text are required.</p>	<p>Agreed.</p>
<p>Paragraph 11.6 of the supporting text states that <i>“Given the nature of the exiting use in supporting the London train network and beyond, as well as being an operational transport police site, it is essential that these uses remain operational during any construction phase.”</i> Further information is requested on this and what is intended by this statement.</p>	<p>The council’s intention was to make it clear that given the critical nature of the British Transport Police building and the existing sidings, that these operations should not be compromised by the construction and operation of any development at the site. During discussions with Network Rail to clarify this, it was suggested that a further wording tweak could be made to ensure that the maintenance of operations for the overall rail network and policing did not have to occur at the site but could be at another</p>	<p>No further comments. Agreed.</p>

<p>The word <i>exiting</i> in the first sentence should be amended to <b><i>existing</i></b></p>	<p>reasonable location. On this basis, the council propose to amend the wording as follows:</p> <p>‘.....’</p> <p>Typo agreed.</p>	
<p>The Policy itself makes no reference to building heights. Only the supporting text at 11.12 makes reference to building heights in the context of impact on local views. Whilst the policy should not be prescriptive on heights or unduly or prematurely constrain the capacity of the site, by setting maximum heights in advance of further testing, NR think that more detail should be included in the site allocation around the mechanism for tall buildings.</p> <p>The London Plan (Policy D9) requires boroughs to identify locations that are appropriate for tall buildings. Network Rail encourages WCC to include Grosvenor Sidings as a location that could be appropriate for taller buildings but this will be informed by and subject to detailed masterplanning work.</p>	<p>This site is not identified as suitable for tall buildings as per the adopted existing building height policy (Policy 41) given it lies outside the Victoria Opportunity Area and the sensitivities in terms of protected views and conservation areas.</p> <p>Further details and testing will be required at the planning application stage to test wider impacts and the overall planning balance. Therefore, the council suggest no changes to the policy or supporting text are required.</p>	<p>Agreed.</p>
<p>Given the current railway use of the site, the draft allocation should not preclude the removal of buildings and existing structures that are not</p>	<p>The council agree with this and confirms that this will be assessed with as part of the new emerging retrofit policy.</p>	<p>Agreed.</p>

suitable for retention to make the site safe for alternative uses.		
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## 3.2 Paddington Opportunity Area and St Mary’s Hospital

Issue raised at Regulation 19	Council position (including proposed modification where relevant)	Network Rail position
<p>Improving permeability from the St Mary’s Hospital site to Paddington station as set out in the draft allocation is supported. However, the Paddington Opportunity Area policy should make explicit reference to improving access at Paddington Station and reference financial contributions being sought to fund access improvements.</p>	<p>Paddington Opportunity Area Policy does not form part of the City Plan Partial Review and clause D of the policy already refers to improvements to transport interchanges. Nevertheless, it is agreed that some additional supporting text could be added to better reflect the existing position that contributions towards station access improvements may be sought from new development in the area, as a consequential modification arising from the introduction of a new site allocation at St Mary’s Hospital. It is therefore suggest to insert to end of paragraph 3.3:</p> <p><i>“As new developments come forward in the area, given their impact on passenger flows, contributions towards improvements to station access may be sought.”</i></p>	<p>Agree with proposed additions.</p>

## 3.3 Victoria Opportunity Area

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Issue raised at Regulation 19	Council position (including proposed modification where relevant)	Network Rail position
There is an opportunity to consider Victoria Station as a key site for providing mixed use developments alongside station improvement.	Whilst it is agreed that the Victoria Station environs offer scope for re-imagining, which could include mixed use development alongside station improvements, insufficient feasibility work has been carried out to date to include the site as an allocation within this Partial Review of the City Plan. There may be scope to include as a future site allocation as part of any subsequent Full City Plan Review. No modification to the plan therefore considered necessary.	Noted and agreed.

## 3.4 Rail Network, Public Transport and Infrastructure, and the Infrastructure Delivery Plan

Issue raised at Regulation 19	Council position (including proposed modification where relevant)	Network Rail position
Policy 30 should be updated to make reference to the updated Infrastructure Delivery Plan to help fund contributions towards station improvements.	Unnecessary – policy 30 is not within the scope of the Partial Review, and the glossary to the plan makes clear that the Infrastructure Delivery Plan is kept under regular review.	Noted. No further comments.
Details provided of planned investment at Paddington, Charing Cross, and Victoria Stations (including costs where known) for inclusion in the updates to the Infrastructure Delivery Plan.	Noted. Projects to be added to the updated Infrastructure Delivery Plan – though no consequential update to the City Plan Partial Review necessary.	Noted. No further comments.

# 4 Conclusion

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# 4.1 Conclusion

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4.1.1 This statement details how issues raised by Network Rail in relation to Grosvenor Sidings and infrastructure provision in their Regulation 19 representation can be resolved through some modification to the plan, which are supported by all parties. It also summarises where there is a fundamental difference of opinion that it has not been possible to resolve through continued cooperation. The statement has been prepared as a live document that can be updated in response to any issues arising through the examination as necessary.

## 4.2 Signatories

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Network Rail agree to the matters referred to in this statement:

Signed by: 

Name: Kevin McGinley

Position: Development Director Network Rail Group Property

Date: 22<sup>nd</sup> November 2024

City of Westminster agree to the matters referred to in this statement:



Signed by:

Name: Debbie Jackson

Position: Executive Director of Regeneration, Economy & Planning

Date: 28<sup>th</sup> November 2024

Planning Policy Team

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November 2024



City of Westminster