

May 2020

# South Kensington Around Station Development Planning Statement

Prepared by DP9 Ltd





## **SOUTH KENSINGTON- AROUND STATION DEVELOPMENT**

### **Planning Statement**

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TfL Correspondence with CWG – 10 August 2019.

## **EXECUTIVE SUMMARY**

The proposed development of the South Kensington ASD site will deliver a new high-quality mixed-use development which will, in turn, provide significant residential, retail, commercial, socio-economic, architectural and environmental benefits which are summarised below.

### **RESIDENTIAL USE**

The proposed development will;

- deliver high quality residential units in a mix of unit sizes, types and tenures which bring diversity and choice to South Kensington.
- deliver 35% on-site affordable housing, as agreed with the Mayor of London.
- supply new homes to meet the acute demand within the Borough and assist in meeting the Council's housing targets.
- provide excellent internal living conditions and in places exceed best practice guidance for living accommodation.
- provide much needed wheelchair accessible homes.

### **RETAIL USE**

The proposed development will:

- bring forward the planned enhancement of South Kensington protecting and enhancing its District Centre designation.
- provide a variety of retail floorspace in terms of size, type and format which will bring diversity and choice to the area.
- provide new restaurants to help support the daytime and evening economy and maintain the attractiveness of South Kensington as a place to visit.
- Deliver a vision for the site which will meet and exceed the Borough's aspirations for high quality retail whilst respecting the amenity of adjoining residents.

**COMMERCIAL USE**

The proposed development will:

- provide new commercial office floorspace which will meet the growing demand for SME workspace in a highly accessible location, further enhancing the character of South Kensington.

**ACCESSIBILITY**

The proposed development:

- has been generated on the principles of inclusive access.
- Completes the delivery of step-free access from the station and Circle & District line platforms to street level. Given the current capacity and congestion issues experienced at the Station, this is a critical element in providing equality for all station users.
- provides clarity in the approach to routes through and across the site which are wide and legible

**SUSTAINABILITY / ENERGY EFFICIENCY**

The proposed development:

- maximises the opportunity for sustainable development given the location above the rail station and the excellent public transport accessibility level.
- will achieve significant carbon reductions of 65.2% in the residential areas of Pelham Street, Thurloe Square and Thurloe Street buildings, and 44.6% reduction in the domestic areas in the Bullnose, Pelham Street and Thurloe Street. A Carbon Offset payment towards zero carbon dwellings is also proposed, which meets London Plan and Local Plan requirements.

**AMENITY**

The proposed development will;

- respect the amenity and privacy of adjoining residents through the scale, massing & design of the proposed buildings.

- provide amenity space where practicable and feasible given the position of the development over and around operational London Underground infrastructure.
- initiate potential public realm and landscaping improvements that could be delivered through the development to the piazza to the south of the station and the existing subway link to the museums and institutions.

### **HIGH QUALITY DESIGN**

- The scheme has been designed to an exceptionally high quality by world class architects Rogers Stirk Harbour & Partners who have an established track record for creating award winning developments.
- The high quality 'masterplan' for the site complements the individual historical and contextual character of each part of the site and repairs the unfortunate damage to the historic fabric caused by the introduction of the railway.
- The proposed development is supported by the Council's Design Review Panel as well as the Mayoral Design Advocate Review process which includes reviews by an independent panel of Mayoral Design Advocates.
- The delivery of a cohesive and sympathetic development, designed by award winning station architect Weston Williamson & Partners, will finally bring forward the long-awaited step free access improvements to the District and Circle lines that have failed to materialise through previous planning applications on the site.
- London Underground Limited have approved the Concept Design Statement confirming that the concept design meets the required standards demonstrating a positive commitment to the delivery of the scheme.
- Specialist design input has been provided by Julian Harrap Architects for the heritage shopfronts, the Thurloe Street façade and the Arcade whilst Weston Williamson Architects have provided expert design and technical advice in respect to the works to the station.
- The refurbished Grade II listed arcade and station is protected and enhanced and retains its place at the heart of the development providing a sense of arrival for all users of the station.

**GLOSSARY OF TERMS**

<b>ASD</b>	Around Station Development- Including development at Thurloe Street, Thurloe Square, Pelham Street, the Bullnose, the Arcade and the SEW.
<b>CIL</b>	Community Infrastructure Levy
<b>CLG</b>	Community Liaison Group
<b>CWG</b>	Consultative Working Group
<b>Listed Buildings</b>	<p>Comprises:</p> <ol style="list-style-type: none"> <li>1. South Kensington Underground Station Grade II Listing (ref 1392067), which comprises the whole of the station, including: <ul style="list-style-type: none"> <li>○ The George Sherrin Shopping Arcade and the wrought iron screens at both the northern and southern subway entrances,</li> <li>○ Leslie Green (Oxblood) building</li> <li>○ Ticket Hall and associated back-of-house spaces,</li> <li>○ All sub-surface structures within the station cutting,</li> <li>○ the upper platform arcaded revetments of pale-yellow brick, lower tier arches, and header arches, and the eastern red brick</li> <li>○ revetments</li> <li>○ curtilage including the Bullnose building</li> </ul> </li> <li>2. South Kensington Station Subway Grade II listing (ref: 1392462), includes the pedestrian subway and entrances to Exhibition Road.</li> </ol>
<b>LUL</b>	London Underground Limited
<b>NL</b>	Native Land
<b>NPPF</b>	National Planning Policy Framework
<b>Pelham Street</b>	The land along Pelham Street (north side), heading east to the intersection of Pelham Street and Thurloe Square.
<b>Proposed Development</b>	Refers to the planning applications description of development.
<b>RBKC</b>	Royal Borough of Kensington and Chelsea.
<b>SCU</b>	Station Capacity Upgrade Works - which includes rebuilding the disused platform on the north side of the station to service the District and Circle lines, a new canopy, new stairs from the ticket hall and the installation of 2 No. lift shafts from the ticket hall to the platform level (with lifts to be installed at a later date as part of the SEW), a new emergency exit to Thurloe Square, an enlarged ticket hall and centralised gate line and the refurbishment of the existing ticket hall (Planning reference PA/17/06372).

<b>SEW</b>	<p>Station Enhancement Works, which include:</p> <ul style="list-style-type: none"> <li>• Providing Step-Free Access between Thurloe Street and the Ticket Hall including new waiting areas.</li> <li>• Installation of 2 No. lifts within lifts shafts provided by the SCU works serving Ticket Hall and District &amp; Circle line Platforms.</li> <li>• Fire escape stairwell from the island platform to Thurloe Square, connecting to the stair well provided as part of the SCU.</li> <li>• Alterations to the existing retail unit within the Ticket Hall</li> </ul>
<b>South Kensington Station</b>	Includes the entrance to the Arcade, the Arcade, the Ticket Hall, and all platforms.
<b>Step-Free Access (SFA)</b>	Creating access from Thurloe Street to Ticket Hall and subway levels within South Kensington Station to the District & Circle lines, through the installation of two lifts and associated waiting areas.
<b>TfL</b>	Transport for London
<b>The Arcade</b>	<p>The area between and including the northern and southern entrances to South Kensington Station.</p> <p>Includes the following properties</p> <ul style="list-style-type: none"> <li>- 1-13 South Kensington Underground Station</li> </ul>
<b>The Applicant</b>	Native Land (Kensington) Limited, TTL South Kensington Properties Limited and London Underground Limited
<b>The Bullnose</b>	<p>Comprises the following properties:</p> <ul style="list-style-type: none"> <li>- 36- 46 (even) Thurloe Street</li> <li>- 1-9 Pelham Street</li> </ul> <p><i>co-ordinates- (51°29'39.0"N 0°10'27.6"W)</i></p>
<b>The Site</b>	Comprises Thurloe Street, Thurloe Square, Pelham Street, the Bullnose, the Ticket Hall, the Arcade and the South Kensington Station.
<b>The Ticket Hall</b>	The area in front of and past the gate line within South Kensington Station.
<b>Thurloe Street</b>	Comprises properties from 20-34 Thurloe Street
<b>Thurloe Square</b>	The area from the intersection of Pelham Street and Thurloe Square to 45 Thurloe Square.



**GLOSSARY- DOCUMENTS SUBMITTED WITH THE APPLICATION**

<b>Affordable Housing Statement &amp; Viability Assessment</b>	Affordable Housing Statement & Viability Assessment Prepared by Gerald Eve, dated 25/03/2020
<b>Air Quality Impact Assessment</b>	Air Quality Impact Assessment, prepared by Sweco UK Ltd, dated, April 2020
<b>Bat Roost Assessment</b>	Bat Roost Assessment, prepared by The Ecology Consultancy, dated 30/03/2020.
<b>Bullnose CTMP</b>	Construction Traffic Management Plan, prepared by Momentum Transport Consultancy, dated, March 2020
<b>CEMP</b>	Construction and Environmental Management Plan, prepared by Gardiner & Theobald LLP, dated April 2020.  <i>Includes the Demolition and Waste Management Plan.</i>
<b>CTMP Technical note</b>	South Kensington ASD: Construction Traffic Management, prepared by Momentum, dated 27/03/2020
<b>Daylight/Sunlight Report (External)</b>	Daylight and Sunlight Neighbourly Impacts Report, prepared by Gordon Ingram Associates, dated, 26/03/2020
<b>Daylight/Sunlight Report (Internal)</b>	Internal Daylight and Sunlight, prepared by Gordon Ingram Associates, dated, 26/03/2020
<b>DAS</b>	Design and Access Statement, prepared by Rogers Stirk Harbour and Partners, Julian Harrap Architects and Weston Williamson + Partners, dated March 2020
<b>Desktop Geotechnical and Contaminated Land Assessment</b>	Desk Study Report, prepared by Geotechnical and Environmental Associated (GEA) Ltd, dated March 2020
<b>Draft FTP</b>	Draft Framework Travel Plan, Momentum Transport Consultancy, dated March 2020
<b>DSWP</b>	Delivery, Servicing and Waste Plan, prepared by Gardiner & Theobald LLP, dated, March 2020
<b>ESS</b>	Energy and Sustainability Strategy, prepared by Sweco UK Ltd, dated 26/03/2020.
<b>FRA</b>	Flood Risk Assessment, prepared by, AKT II Ltd, dated March 2020
<b>FDSP</b>	Framework Delivery and Servicing Plan, prepared by Momentum Transport Consultancy, dated, 27/03/2020
<b>HEA</b>	Historic Environment Assessment, prepared by the Museum of London Archaeology (MOLA)

<b>Heritage Statement</b>	Heritage Statement, Prepared by Alan Baxter, February 2020
<b>Noise and Vibration Assessment</b>	Noise and Vibration Assessment, prepared by Sweco UK Ltd, dated 26/03/2020
<b>Pelham Street and Thurloe Square CTMP</b>	Construction Traffic Management Plan, prepared by Momentum Transport Consultancy, dated, March 2020
<b>S106 Agreement</b>	Section 106 Agreement
<b>SCI</b>	Statement of Community Involvement, prepared by Kanda Consulting, dated March 2020
<b>Socio-Economic Benefits Statement</b>	South Kensington Station- Around Station Development, Socio-Economic Benefits Statement, prepared by Hatch Regeneris dated March 2020
<b>SUDS Strategy</b>	Sustainable Drainage Systems Strategy Report, prepared by AKT II Ltd, dated March 2020
<b>TA</b>	South Kensington Transport Assessment, prepared by Momentum Transport Consultancy, dated March 2020
<b>TBHVA</b>	Townscape, Visual and Built Heritage Assessment, prepared by The Tavernor Consultancy, dated, March 2020
<b>Thurloe Street CTMP</b>	Construction Traffic Management Plan, prepared by Momentum Transport Consultancy, dated, March 2020

## 1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by DP9 Limited on behalf of Native Land (Kensington) Limited, TTL South Kensington Properties Limited and London Underground Limited (the Applicant) to provide an assessment of the proposed South Kensington Around Station Development (ASD). This Planning Statement has been prepared in accordance with the Town and Country Planning Act 1990.
- 1.2 This Planning Statement has also been prepared in accordance with Section 7 of the Planning (Listed Buildings and Conservation Areas) Act 1990 regarding the proposed changes to the South Kensington Station which is a Grade II Listed Building (list entry reference 1392067).
- 1.3 The proposed description of development is outlined below:

*Mixed use development of the land around South Kensington Station providing for: the demolition and redevelopment of the Bullnose (including Use Classes A1, A2, A3 and B1), demolition and façade retention of the Thurloe Street Building, refurbishment of the retail facades and Use Class A1/A3 at the ground floor of Thurloe Street, redevelopment of residential use behind the retained facade on Thurloe Street (Use Class C3) above the ground floor, refurbishment of the Arcade, construction of a building along Pelham Street comprising of residential use (Use Class C3), retail use (Use Class A1, A2 and A3), and Office use (Use Class B1), construction of a building along Thurloe Square to provide for Use Class C3, alterations to South Kensington Station to facilitate the completion of the step-free access to the District and Circle Lines and fire escape, including consequential alterations to the layout of the Ticket Hall, construction of two retail facades within the Subway, provision of cycle parking and other works incidental to the application proposal.*

- 1.4 The Listed Building Consent description of development is outlined below:

*Restoration and refurbishment of the retail facades within the Arcade, alterations to the Ticket Hall within the South Kensington Station to facilitate the completion of the step-free access, construction of a fire escape stairwell, construction of two retail facades within the subway, demolition of the brick wall along Pelham Street and other associated works.*

- 1.5 RBKC provided their Screening Opinion, dated 6 August 2019 (submitted with this application, planning reference EIA/19/05959) that confirmed that an Environmental Impact Assessment (EIA) was not required to be submitted with this Planning Application. The proposal was not considered to fall within any of the descriptions of development or thresholds for either Schedule 1 or 2 development of the EIA regulations. As such, not EIA is submitted with the planning application.

- 1.6 The address for the site is:

*South Kensington Underground Station, 20-48 (even) and 36-46 (even) Thurloe Street, 1-9 (odd) Pelham Street and 1-13 South Kensington Station Arcade, 20-34 Thurloe Square, and the land along the north side of Pelham Street between Thurloe Square and the Oxblood Building at South Kensington Station, including 41 Pelham Street, London, SW7. The site also includes sections of the public realm immediately to the south of the station and the pedestrianised area of Thurloe Street.*

## 2. SITE CONTEXT

- 2.1 The site comprises Thurloe Street, Thurloe Square, the Bullnose, the Arcade, Pelham Street and the South Kensington Station. These areas are collectively referred to as “The Site” throughout this Planning Statement.
- 2.2 The site covers a 0.8ha area and is bounded by Thurloe Street to the North, Thurloe Square to the East, Pelham Street to the South and Cromwell Place to the West, including the South Kensington Tube Station, located at SW7 2ND. The site location plan is enclosed within the submitted drawing pack prepared by RSHP. The site is located within the Thurloe/ Smiths Charity Conservation Area as identified within the Local Plan 2019.
- 2.3 The redline boundary includes the locations where cycle parking will be provided within the piazza and along Thurloe Street area as well as the proposed servicing bay on Pelham Street.
- 2.4 The wider area surrounding the site includes the internationally important cultural/museum precinct to the north, including the Natural History Museum and the Victoria and Albert Museum, an institutional precinct, including the Imperial College (a world leading university), a number of public open spaces to the south and east, including Thurloe Square Gardens and a retail/commercial centre to the west of the site along predominantly along Cromwell Road and Old Brompton Road. To the south are two important hospitals known as the Royal Marsden and the Royal Brompton Hospitals.
- 2.5 A full description of the development history of the site is contained within the Heritage Assessment and Design and Access Statement (DAS) submitted with this application and provides the source for many of the references below.

### South Kensington Station and its Arcade

- 2.6 South Kensington Station was originally constructed in 1868 but was substantially altered in 1907 and 1951. It is a Grade II listed building. The construction of the railway had a significant impact on the historic fabric of this

area. The proposed development seeks to repair this unfortunate impact and interventions that were created. The way that the ASD achieves that repair is described more detail in the Heritage Statement and the DAS.

- 2.7 The station is serviced by the District, Circle and Piccadilly London Underground lines. The station is the main public transport facility serving the area described above together with those institutions and facilities indicated. (see para 2.4)
- 2.8 South Kensington Station is one of the busiest stations in TfL's network having over 34 million visitors per year. This results in the station becoming heavily congested during, and even outside of, peak hours. The station currently has no step-free access from the platforms to the street level, which impacts upon the ability for many users to safely and efficiently access this important facility. Evidence shows that a great number of passengers who would normally disembark or transfer at South Kensington will often travel on to Gloucester Road simply to avoid the congestion. Given the site's location within the heart of the cultural quarter in South Kensington and the proximity to the two nearby hospitals, the lack of access into and through the station is a fundamental issue that needs to be resolved.
- 2.9 The Arcade is the main entrance into South Kensington station with two sets of stairs linking the Arcade to the Ticket Hall. It is lined on either side with small retail units. The main entrances to the station are via the Arcade on Pelham Street and Thurloe Street. The existing shopfronts have been subject to various piecemeal alterations, resulting in a lack of consistency in design. There is a small office above the station, located at the first floor that is accessed via the Arcade.
- 2.10 The Ticket Hall is access via two stairwells via the Arcade. Within the Ticket Hall, there is access to the Underground platforms, the Subway, and two retail units. As noted, the Ticket Hall is heavily congested during peak hours and weekends and is often subject to short notice closures for passenger safety.

- 2.11 The station is a Grade II listed building (1392067). The listed description identifies elements of the station include the Arcade (including the retail frontages and barrel-vaulted roof above the Arcade), the wrought iron signage, and the brickwork. The oxblood tiles along Pelham Street, while not specifically listed in the description of the listed building, are considered to be of significant importance to the conservation area.

*The Bullnose*

- 2.12 The Bullnose is the semi-circular single-storey building at the intersection of Cromwell Place, Brompton Road and Thurloe Street. The building contains a number of small retail units. At the rear of the Bullnose is the Arcade and entrance to the South Kensington Tube Station. The retail frontages on the Bullnose lack legibility, unity and consistency. The Bullnose is not assessed to be of any historic significance and indeed is not in keeping with the surrounding area. The quality of the retail frontages and signage are considered to detract from the setting of the station.

*Pelham Street*

- 2.13 Pelham Street, between Old Brompton Road and Thurloe Square, is a single-sided street with residential properties along the south side of varying age, scale and appearance. At the western end of Pelham Street there is a large eight storey residential building with commercial units at lower ground level. The northern side of Pelham Street comprises a brick wall and hoarding running along the entire length from the South Kensington Station Oxblood building to Thurloe Square. Historic reference documents confirm the existence of units along the north side of Pelham Street which were demolished to make way for the railway line, re-built and then demolished again in the late 1970s.
- 2.14 On the corner of Pelham Street and Thurloe Square there is a small light-industrial site, currently occupied as a roofer's yard. This is the only built-upon land on the north side of Pelham Street.

Thurloe Square

- 2.15 Thurloe Square is on the eastern side of the station, adjacent to the Thurloe Square bridge that runs over the railway lines. The extent of the site that forms part of this planning application comprises the existing large brick wall that runs over the railway line and the adjoins the red brick building at 52 Thurloe Square.

Thurloe Street

- 2.16 Thurloe Street, between Cromwell Place and Exhibition Road is a pedestrianised zone, providing a key link between the cultural/museum quarter and South Kensington Station. Thurloe Street is characterised on the north side by residential properties with retail at the ground floor and basement.
- 2.17 The Thurloe Street building currently comprises a ground-floor plus 3 storeys and basement, 19<sup>th</sup> century building that providing retail units at the ground floor with residential use and some office use above. The building has a prominent, mainly brick façade. Similarly, to the Bullnose, the retail frontages lack continuity and presence on the street frontage albeit there are some retained historic shopfronts which reflect the original character of the building.
- 2.18 Internally, the living accommodation was originally arranged as a series of townhouses. Over time, these units have been converted to apartments which are not up to the modern standards. The apartments are only accessible via steep staircases. The resulting apartments are not in line with the Building Regulations in terms of thermal standards and accessibility and would take significant redevelopment to bring these apartments up to the current standards.
- 2.19 With regards to the retail shopfronts, only two of the original frontages remain, being no 26 and elements of 20. Over the years, there has been various



unsympathetic alterations to the shopfronts which detract from the character of the Conservation Area.

Listed Buildings

2.20 The importance of the buildings within the site and surrounding area range from 'limited' to 'high' significance in heritage terms. This is set out in more detail in the accompanying Heritage Assessment prepared by the Alan Baxter.

2.21 The following buildings within the site boundary are subject to a statutory listing:

- South Kensington Underground Station- Grade II (1392067)
- South Kensington Subway- Grade II (1392462)

2.22 The following listed buildings are located adjacent to the site boundaries:

- all the houses on Thurloe Square- Grade II save for 5 Thurloe Square (which is not listed)
- 2- 18 Thurloe Street- Grade II (1265577)
- 1-13 Thurloe Street- Grade II (1226953)
- 15-18 Cromwell Place – Grade II
- 16-18 Pelham Place – Grade II
- 1-29 & 2-14 Pelham Place – Grade II\*

2.23 As described earlier, to the north of the South Kensington Station is the institutional and cultural quarter, which supports a high concentration of internationally important cultural and educational institutions and Grade I listed buildings including the Natural History Museum, Victoria and Albert Museum and the Royal Albert Hall.

South Kensington Station Listing

2.24 The listing description held on the Historic England website outlines the items of importance and special interest within the South Kensington Underground Station (listing 1392067). The Grade II listed Station includes a range of structures which are set out in the listing description. These include the following -

- The Victorian yellow brick revetments, for their historical and architectural value;
- The Victorian cast iron columns along the demolished southern platform, for archaeological value; and
- The Edwardian arcade, including the roof designed by George Sherrin, for historical and architectural value.

2.25 A full assessment of the significance of the South Kensington station is outlined within the Heritage Statement

2.26 The description of the South Kensington Station on the Historic England listing confirms that the rest of the station is not regarded as possessing special interest

The Subway

2.27 The listing description held on the Historic England website also describes the South Kensington Subway which is Grade II listed (1392462). The subway has heritage significance due to its special interest as a relic of South Kensington's function as an international exhibition centre and the application of engineering to create a means of managing foot traffic. The Historic England listing website notes that the subway is well preserved, and the finishes are generally original. The accompanying Heritage Assessment provides a comprehensive historical and architectural assessment of the subway.

### 3. PLANNING HISTORY

- 3.1. There have been many proposals for the redevelopment of the site that have been put forward in recent times. The previous proposals for the redevelopment of the site were either not viable or were not supported by the Council and therefore did not come forward. The lack of a cohesive and sympathetic scheme has therefore prevented the delivery of long-awaited significant enhancements needed to alleviate the congestion and accessibility issues at the station as well as the wider benefits that a redevelopment scheme would bring forward.
- 3.2. The table below provides details of the history of the site in relation to the applications submitted to RBKC for the comprehensive development of the site. It does not include the separate planning permissions for changes in use and advertisement consents that have been granted in relation to the existing retail and commercial uses within the site.

*Table 1- Comprehensive Development Planning History for the site.*

Reference	Description of Development	Determination
TP/93/00831 TP/93/00832	<p><i>Demolition, redevelopment and refurbishment to create mixed use scheme for shopping (inc. retail, professional office &amp; food and drink uses), business (including Class B1 uses), residential, new underground station and facilities, engineering works and ancillary uses.</i></p> <p>This development comprised of 87 residential dwellings, 9,484 sqm of office space, 1,411 sqm of retail and 880 sqm of restaurant space. The renewal of this application was later sought- see below PP/04/00085)</p>	<p>Application Granted 12/06/1993 (Not implemented)</p>

CC/03/01505 PP/03/01504	<p><i>Demolition of existing buildings and redevelopment and refurbishment to provide: buildings for offices (B1); retail (A1, A2, A3); residential (C3); works of hard and soft landscaping; ancillary car parking and service areas together with other works incidental to the application proposals, including improvement works to the foot tunnel running beneath the site under Exhibition Road." (Major Development</i></p> <p>This mixed-use scheme included the redevelopment of the Station, 16,670 sqm of office space, 125 residential dwellings and 2,226 sqm, with heights up to 10 storeys.</p>	Application withdrawn 03/06/2003
CC/04/00086 PP/04/00085	<p><i>Demolition and refurbishment to create mixed use scheme for shopping (inc retail, professional office and food and drink uses), business (including B1 uses), residential, new underground station facilities, engineering works and ancillary uses (renewal of Planning Permission dated 08/01/1999 reference TP/93/0831 (Major Application)</i></p>	Application withdrawn 06/04/2004

3.3. London Underground Limited (LUL) are currently progressing a separate project called Station Capacity Upgrade Works (SCU) which was granted planning permission in January 2018. (Planning reference PA/17/06372 and LB/17/06308). These works do not form part of the proposed development.

3.4. The primary aim of the SCU within the South Kensington Station is to increase capacity to the District & Circle lines (D&C). To facilitate this, essential changes to the existing fabric of the station will be undertaken as part of the phase I approval which includes the re-opening of the extended redundant northern platform, extensions and remodelling of the ticket hall and the installations of

the stage 1 infrastructure for the step-free access which will then be completed by the proposed ASD scheme.

#### 4. PRE-APPLICATION DISCUSSIONS

- 4.1. The Project Team have engaged extensively with the Planning and Design/Conservation teams at RBKC throughout 2019-20 to inform the development of the design. There have been regular pre-application meetings to discuss the overriding principles of the development alongside the finer details of the project. This process has been positive and informative and has resulted in the submitted scheme which carries the 'in-principle' support of Planning Officers.
- 4.2. A summary of the key design issues and the revisions that were made as a result of the ongoing discussions with officers is referenced within the DAS. These discussions have been fundamental in shaping and refining the design that is presented within this planning application.
- 4.3. In addition, the applicant has presented various stages of the scheme as it has evolved with key members within the Council including the Lead Member for Planning & Transport, the Chair of the Planning Committee and ward councillors. Once again all of these meetings were engaging, positive and informative such that a number of significant revisions were made to the scheme through this process. A summary of the meetings that were held is set out within the accompanying Statement of Community Involvement (SCI).
- 4.4. The proposed development was the subject of formal pre-application consultation with Historic England. They outlined their general support for the principle of the proposed development and confirmed that the design approach taken by the architects is '*contextual and informed by the historic environment locally*'.

## 5. TfL CONSULTATION (2016)

- 5.1 A document<sup>1</sup> to consider the development parameters for South Kensington Station was prepared on behalf of TfL, titled *South Kensington Station Around Station Development- Development Brief, December 2016*, with input from various consultants and involvement of residents forming the CWG in December 2016.
- 5.2 The aim of the document was to provide a broad consensus of agreement between TfL and local resident's groups about the form of the development of the site and the delivery principles of the ASD that might be brought forward through a future development agreement and subsequent planning application.
- 5.3 The purpose of this document was to then inform TfL's approach to procuring a development partner. In the selection of Native Land and the scheme that has been bought forward, due regard has been given to the principles of the brief and the priority needs of the CWG in particular, as set out by Graeme Craig in his email to CWG members on 10 August 2019 (refer to appendix).
- 5.4 The limitations of the exercise were such that the document was unable to take into account all the key practical and commercial constraints that would need to be considered in preparing a comprehensive brief for a subsequent development scheme. It also did not address the delivery of on-site affordable housing.
- 5.5 The document established principles that were sufficiently flexible to generally address the relevant planning policies, at the time, and to reflect the ongoing dialogue with stakeholders. It outlined some of the design and planning principles for the ASD and various parameters around the development of the

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<sup>1</sup> <https://tfl.gov.uk/travel-information/improvements-and-projects/documents-and-presentations>

site. The Development Brief was not a fully resolved set of proposals and did not seek to limit the eventual designs.

5.6 It is important to note that the document was led by TfL and not the Local Planning Authority. It has no formal planning status and carries no material weight in the decision-making process for any application subsequently submitted. Accordingly, it has not been adopted by RBKC as a policy document in any form.

5.7 Despite the lack of any policy weight given to the document, it is apparent that residents and members of the CWG consider the document to be a relevant reference point for any application submitted. Whilst not attributing any weight to the document, it is apparent in the submission material that the principal development objectives outlined have helped inform the basis of the proposed design presented within this planning application.

5.8 The *objectives* of the document are outlined below:

- To deliver an exemplary development which enhances TfL's reputation for world class stewardship of its stations and estate, particularly given South Kensington Station's status as the gateway to internationally renowned cultural institutions;
- To develop the site in a manner that respects and enhances the historic architecture of South Kensington station, including its setting in the Thurloe Estate and Smith's Charity Conservation Area;
- To preserve and enhance the setting of the listed Grade II South Kensington station and its role in supporting local residents, workers, students and the visiting public in South Kensington;
- To restore the George Sherrin designed Arcade to its original glory as fine example of Edwardian retail architecture;



- 
- To enable completion of step free access to the District & Circle lines;
  - To provide a good quality and respectful scale of development and mix of uses;
  - To provide new homes and jobs, and to generate income through capital and revenue receipts to be used to continue TfL's investment in the London transport network;
  - To provide improved housing and retail facilities on Thurloe Street, the Arcade and the Bullnose, and where necessary reinstate historic shopfronts to reflect their original design;
  - To restore Pelham Street in keeping with the local and historical contexts
  - To provide a mix of uses which enhance the place and experience of South Kensington.

## 6. APPLICATION PROPOSALS

### Description of Development

6.1 The following sections provide an overview of the proposed development associated with the ASD. Full details of the proposed development are contained within the DAS.

6.2 The ASD comprises of four main components:

- South Kensington Station improvements and redevelopment (including the Bullnose, the Subway (southern end only), the Ticket Hall and the Arcade);
- Construction of a new mixed-use building along Pelham Street;
- Retention of the existing façade of the Thurloe Street Building with retention and restoration of the retail shopfronts. Behind the façade, the redevelopment of the ground floor retail units and residential units above; and
- The construction of a new residential building on Thurloe Square.

6.3 Each element of the ASD is summarised in the following sections. Full details of the proposed works can be found within the DAS.

6.4 South Kensington Station Enhancement Works:

- The provision of an entrance from Thurloe Street which provides step-free access to the ticket hall and subway.
- Amendments to the ticket hall to facilitate the completion of the step-free access from Thurloe Street to the Ticket Hall, subway and the District & Circle Platforms, including installation of two lift shafts from street level at Thurloe Street to the Ticket Hall and subway and alterations to the Ticket Hall at the basement level.

- Installation of lifts within the lift shafts (installed as part of the Station Capacity Upgrade works) to complete the step-free access from Ticket Hall to the District & Circle line Platforms.
- Alterations to the existing floor levels within the station to provide for the installation of the lifts.
- Relocation of retail use within the Ticket Hall south of the waiting area.
- Changes to the consented fire escape stairwell from Platform 5 (new platform) up to Thurloe Square at the eastern end of the tube platforms leading to Thurloe Square. An additional staircase will be added down to the island platform, creating a combined fire escape and also an interchange between Platform 5 and the island platform.
- Realignment of the glass barrier separating the unpaid and paid ticket hall to the north of the ticket hall.
- New way finding signage within the Ticket Hall.
- Retention of the office use accessed via the Arcade.

#### 6.5 Restoration of The Arcade

- Retention of the existing signage and entrance way to the tube station
- New wayfinding signage to the step-free access entrance on Thurloe Street
- Restoration of the shopfronts within the Arcade
- New wayfinding signage to the step-free access point at Thurloe Street installed within the Arcade.

#### 6.6 Alterations to the Subway

- Installation of two new retail frontages within the vertical section of the subway wall, with glazed frontages set back from the subway wall line. The entrances will provide access to the basement retail use in Thurloe Street.

#### 6.7 Redevelopment of The Bullnose

- Demolition of the existing Bullnose building

- Construction of a ground plus 3 storeys building including a mezzanine level within the ground floor.
- Retail (Class A) floorspace on the ground floor (including a mezzanine floor), with office space on the upper floors.
- New openings to be introduced through to the retail units on the western side of the Arcade.

#### 6.8 Proposed Pelham Street Building

- Clearance of the site at the eastern end of Pelham Street.
- Development of a ground plus 3-4 storey mixed use, retail (Class A), residential and office building along Pelham Street, above the derailment zone within the South Kensington Station.
- Providing for 18 units, 17 of which are affordable units.
- Duplex units at the ground floor of the retail section of the building

#### 6.9 Proposed Thurloe Square building

- Construction of a new staircase at the end of the platform to provide an emergency escape from the District and Circle line platforms on to Thurloe Square.
- Construction of a ground plus 4-storey building with 12 new residential units and amenity space above the train platform stairwell at the eastern end of the station.

#### 6.10 Proposed changes at Thurloe Street

- Restoration of shopfronts along Thurloe Street.
- The loss of one retail unit to provide for the entrance to the step free access to the District & Circle line.
- The loss of one retail unit to provide for access to the residential apartments.
- Retention of the façade and the redevelopment of the residential units behind the façade.

- An additional mansard floor of residential floor space on top of the existing building.
- Redevelopment of the retail (Class A) use at basement level to provide access from the Subway.
- Provision of a total of 20 new residential units.

#### 6.11 Transport and Servicing (Parking, Cycling and servicing and deliveries)

- The proposed development is to be car-free, with no on-site residential parking provided or off-site parking permits offered as part of the development.
- Cycle parking is proposed to be provided in line with Intend to Publish London Plan policies for all parts of the proposed development.
- A centralised commercial waste store on Pelham Street is proposed to accommodate waste generated by commercial uses within Pelham Street the Bullnose. Waste is proposed to be transferred to this store by members of the facilities management team for collection.
- Retail uses on Thurloe Street will continue to use Thurloe Street for servicing.
- Residential waste at Pelham Street would be stored in a residential waste store adjacent to the centralised commercial waste store.
- The existing bags-on-street operation for residential and commercial waste from Thurloe Street and the Bullnose retail use would be maintained.
- Residential waste from Thurloe Square would be stored in a centralised bin store at ground floor.
- A new on-street loading bay at the western end of Pelham Street is proposed. This would formalise existing servicing operations which currently block the Pelham Street carriageway, as well as accommodate servicing for the proposed development at Pelham Street and Bullnose

## Heritage Assets

6.12 The site includes a number of elements that are Statutory Listed Buildings including the South Kensington station and adjoining subway tunnel.

6.13 South Kensington Station Underground Grade II Listing description (ref 1392067), includes the Arcade, the wrought iron screens at both the northern and southern subway entrances, the upper platform arcaded revetments of pale-yellow brick, lower tier arches, and header arches.

6.14 Alterations to the listed aspects of the South Kensington Station and the surrounding buildings as noted above, comprise:

- Restoration and refurbishment of the retail facades within The Arcade including the replacement of the glazing.
- Redevelopment within the Ticket Hall, including the introduction of step-free access to the District and Circle lines and reconfiguration of the layout.
- Realignment of the glass barrier separating the unpaid and paid ticket hall to the north of the Ticket Hall.
- Extension of the sealed balustrade against the revetment wall on the north of the unpaid ticket hall.

6.15 Full details of the alterations to the listed buildings and items is contained within the DAS.

6.16 The South Kensington subway tunnel is also a Grade II Listed building (reference 1392462). The proposed development results in the creation of two new retail units at the basement level resulting the creation of two retail facades within subway as well as changes to the entrance to the Subway within the Ticket Hall. The proposed works will result in the removal of some of the original fabric of the subway. Full details of the proposed development work to the subway are detailed within the DAS.

### Area Schedule

6.17 The table below outlines the existing area schedule for the site, as well as the proposed new uses for each of the four areas of the Site.

*Table 2- Area schedule*

Use	Existing GIA (m <sup>2</sup> )	Proposed GIA (m <sup>2</sup> )
Retail (A Class)	2502	2282
Office (B1)	326	3247
Residential (C3)	1046	6471
Light Industrial	166	0
<b>Total</b>	<b>4,040</b>	<b>12,000</b>

### Construction Methodology

6.18 The proposed construction methodology is outlined within the draft Construction Environmental Management Plan (CEMP) submitted with this application. It is anticipated that the construction of the development will take approximately 2.5 years to complete. The proposed methodology submitted with this application anticipates that all four areas of the development may commence at the same time to reduce the overall duration of the construction programme. The CEMP should be referred to for the details regarding the methodology.

6.19 The construction methodologies presented within the CEMP outline the best practice methods for the construction of a project of this type. As noted, LUL have approved the Concept Design Statement and have confirmed that it meets all the required standards and will not cause any adverse effect on the operation of the railway. A supplementary CEMP will need to be submitted as a pre-commencement condition of the proposed development. The CEMP submitted with this application presents the best practice construction methodology for this complex project, using conservative figures for

anticipated construction durations, site deliveries, noise and vibration and traffic management of the site.



## 7. PLANNING POLICY FRAMEWORK AND OVERVIEW

7.1 This section provides a brief summary of the key planning policies relevant to the site and its redevelopment. The Development Plan for this site includes the London Plan (2016), the Intend to Publish London Plan (December 2019) and the RBKC Local Plan (2019).

7.2 The Thurloe Estate and Smith's Charity Conservation Area Appraisal (2016) is also a material consideration for the proposed development.

7.3 At the national level, the National Planning Policy Framework (NPPF) represents the most-up-to-date planning policy and is a material consideration in assessment of this planning application.

7.4 The site is subject to the following designations:

- Sloane Square Critical Drainage Area
- The Bullnose and the retail units on Thurloe Street are within the District Shopping Centre Zone.
- Thurloe Street/Smith's Charity Conservation Area (the Conservation Area)
- Flood Zone Area 1 (an area assessed as having a less than 1 in 1000 annual probability of river or sea flooding)

7.5 Following a ministerial statement on planning from Communities Secretary, Robert Jenrick, published on 13 March 2020, the Ministry of Housing, Communities and Local Government have published the policy paper – *Planning for the Future* – which contains a number of important announcements on the government's proposed approach to housing and planning going forward. The paper contains a number of proposed amendments to the Intend to Publish London Plan, which includes a commitment to maximise housing delivery in London. This paper also outlines that the future delivery of housing in London must take a more proactive approach to enabling home building access the country noting that this

*includes supporting them to consider innovative options, such as housing-led regeneration of their high streets, building upwards on already developed land and station<sup>2</sup>.*

- 7.6 With regards to brownfield development, such as we are dealing with here, the policy paper states that the Government consider it *'vital that we make the most of existing transport hubs, encouraging modern, green communities where people live close to public transport<sup>3</sup>'*.
- 7.7 This paper signposts the likely direction of future planning policy and it is therefore important that such consideration is given to a scheme such as this now in order to maximise the opportunity that the site presents. Indeed, this is also in line with the principles of "Good Growth" outlined in the Intend to Publish London Plan.

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<sup>2</sup> Refer to Section 8 of the Planning For the Future paper, published by the Ministry of Housing, Communities and Local Government, March 2020

<sup>3</sup> Refer to Section 10 of the Planning For the Future paper, published by the Ministry of Housing, Communities and Local Government, March 2020

## 8. PLANNING POLICY ASSESSMENT

8.1 The Planning Policy assessment addresses the following topics and outlines how the development meets or exceeds the policy expectations at national, regional and local levels –

- Overall Development Strategy
- Socio-economic assessment
- Housing
- Affordable Housing
- Retail
- Office
- Step-Free access
- Design
- Townscape
- Heritage
- Heritage Assets
- Archaeology
- Landscaping/public realm
- Thurloe Street roof alteration
- Socio Economic assessment
- Basements
- Accessibility
- Parking and transport
- Cycling
- Servicing
- Sustainability
- Air quality
- Flood risk
- Noise and vibration
- Construction effects

- Contaminated Land
- Ecology

Overall Development Strategy

- 8.2 Policy GG2 of the Intend to Publish London Plan states that to create successful mixed-use places that make the best use of land, policies must enable the development of brownfield land, prioritise sites which are well connected to public transport and apply a design-led approach to determine the optimum development capacity of sites. The policy also supports car-free developments, supporting a target of 80% of all journeys using sustainable travel, allowing for an efficient use of land (as required the Mayor's Transport Strategy).
- 8.3 The proposed development delivers on the expectations of Policy GG2 of the Intend to Publish London Plan as it provides for a comprehensive development of a brownfield site that is already extremely well connected to public transport, while respecting the character of the existing environment.
- 8.4 In reference to Policy GG2 of the Intend to Publish London Plan, the ASD is the best use' of the land and the design-led approach has been developed by three teams of award winning architects, who have produced a contemporary design, that respects the character or the area and restores the existing historic elements and helps remedy the unfortunate interventions into the historic fabric of the area caused by the construction of the railway. Furthermore, the scheme restores the Listed Arcade and the non-listed the Thurloe Street façade which has high value in regard to the character of the Conservation Area.
- 8.5 Policy 2.15 of the Adopted London Plan aims to sustain and enhance the viability and vitality of town centres. The London Plan identifies South Kensington as a medium growth area with moderate demand for retail, leisure and office space, with the physical and public transport capacity to accommodate the growth. The proposed development is consistent with the

policy direction to enhance the vitality of the town centre, providing enhanced retail and office space offerings and increasing accessibility to South Kensington for all abilities.

- 8.6 As noted by Policy CV14 of the Local Plan, the vision for South Kensington is to “maintain two distinctive identities, being a cultural destination and a residential neighbourhood of distinction”.
- 8.7 South Kensington Underground Station acts as a gateway to those important internationally renowned institutions mentioned above. However, it patently fails to provide an appropriate *sense of arrival* for a major cultural destination and lacks step free access. There are a number of objectives and actions identified within the Local Plan to try to achieve the policy direction. These objectives include providing step free access to all platforms, restoring the listed Arcade and the block to the south of Thurloe Street, restoring its shop fronts and protecting A1 use classes as a part of the station improvement works.
- 8.8 The proposed development delivers on most these objectives within Policy CV14 of the Local Plan. The proposed development will facilitate the delivery of step-free access to the District and Circle Lines whilst the Arcade is protected and enhanced along with the ground floor retail units on Thurloe Street. These play a role in maintaining the District Centre status of South Kensington as well as providing the sense of arrival befitting the internationally renowned cultural centre and major tourist destination to the north.
- 8.9 The proposed ASD development is consistent with Policy CO1 of the Local Plan which encourages developments to “Keep life local”, by providing strong neighbourhood centres, shopping facilities and residential developments. The proposed development is a prime example of *transit orientated development* whereby development is focused around key public transport links, minimising the need for the use of a private vehicle by providing an inclusive walkable

mixed-use neighbourhood centre. The provision of “step free access” ensures that all passengers and station users can move into and through the station to access the District and Circle Lines as well as access the new retail units around the ASD.

- 8.10 The proposed development will secure the delivery of new residential units in a highly accessible and sustainable locations. This includes the provision of on-site affordable housing.
- 8.11 Overall, the proposed development is consistent with the overarching policy direction within the London Plan, the Intend to Publish London Plan and the Local Plan.

*Socio Economic Benefits*

- 8.12 Policy GG5 of the Intend to Publish London Plans aims to conserve and enhance London’s global economy to ensure that economic success is shared amongst all Londoners. The policy notes that those involved in development should promote the strength and potential of the wider city region, diversity the economy, plan for sufficient employment space and ensure that high-quality and affordable housing are provided as well as social infrastructure to support London’s growth. This policy also aims to promote London’s rich culture and heritage and make the fullest use of the Capital’s existing and future public transport, walking and cycling networks.
- 8.13 A Socio-Economic Benefits Statement prepared by Hatch Regeneris is submitted with the planning application. The Statement acknowledges that South Kensington Station is a District Centre, seen as playing two significant roles- a cultural designation within the Central Activities Zone and a residential neighbourhood of distinction. This statement outlines a series of economic, social and wider environmental benefits as a result of the construction and completion the proposed development.

- 8.14 The Socio-Economic Benefits Statement outlines the context of South Kensington and provides an extensive assessment of the socio-economic benefits of the proposed development, including temporary benefits during the construction period through the increase in employment and CIL, increase in the number of full time jobs, increase in business rates, increasing the number of homes within the Borough, including affordable homes, and increasing the number of people able to live within the Borough.
- 8.15 It is clear that the proposed development will result in significant economic and social benefits for the local area both during construction and once the development is occupied. As noted within the Socio-economic Benefits Statement, the delivery of the step free access will bring wider social benefits by reference to the increased accessibility to the area for local residents, visitors to the cultural institutions and those that visit the nearby hospitals who experience mobility issues. There will also be wider benefits to the Borough and London as a whole given the improvements to the station and the enhanced retail and economic activity that will result.
- 8.16 The Socio-Economic Benefits Statement also outlines the benefits of possible improvements to the public realm and piazza at the entrance to the South Kensington Station. While these works are not included within the proposed development, there are ongoing discussions with RBKC as to the potential improvements that could be made to the public realm through financial contributions as a result of the proposed development. Any agreement of the nature and scale of the public realm enhancements will be secured within the Section 106 Agreement.
- 8.17 Overall, the proposed development is consistent with Policy GG5 of the Intend to Publish London Plan.

Housing

- 8.18 The Intend to Publish London Plan Policy GG4 aims to create a housing market that ensures that more homes are delivered, are genuinely affordable, and creates mixed use and inclusive communities. The proposed development will provide 50 dwellings within the Borough, of which 35% will be affordable by habitable room. The adopted London Plan Policy 3.3. recognises that there is a pressing need for more homes for Londoners, in a way that meets their needs at a price they can afford.
- 8.19 The Intend to Publish version of the London Plan, Policy D6 and London Plan Policy notes the policy framework for achieving good quality housing. In accordance with Local Policy CH3, new residential developments are also required to meet the London Plan minimum standards for open space and access. All the proposed units comply with the London Plan Minimum Internal Space guidelines for new dwellings.
- 8.20 The Ministry for Housing Communities and Local Government released a Paper in March 2020, titled *“Planning for the Future”* following the ministerial statement on planning from Communities Secretary, Robert Jenrick. This paper includes a call for proposals for building above stations particularly in urban areas. It states that the government will conduct a call for proposals to seek evidence on the barriers to, and opportunities in, building above stations in urban areas. The paper states that they consider it *‘vital that we make the most of existing transport hubs, encouraging modern, green communities where people live close to public transport.’* This paper signposts the likely direction of future planning policy and it is therefore important that such consideration is given to a scheme such as this now in order to maximise the opportunity that the site presents. Indeed, this is also in line with the principles of *“Good Growth”* outlined in the Intend to Publish London Plan.



- 8.21 Policy CO6 of the Local Plan outlines that a strategic objective of the Borough is to improve the supply of housing to further the aim of sustainable development, catering for a variety of needs.
- 8.22 Policy CH3 of the Local Plan requires new residential development to include a range of types and sizes of homes to address the varying needs of the Borough. The Proposed development will provide 50 residential units, with 34% one-bedroom units, 34% two-bedroom units, 24% three-bedroom units and 8% four-bedroom units. This mix of units provides for a wider opportunity for those wishing to live within the South Kensington Area and will create a more balanced residential community. Overall, the proposed unit mix is consistent with Policy CH3 of the Local Plan as it provides for a mix of housing types and sizes taking into account the characteristics of the site.
- 8.23 Given the proximity of the site to the South Kensington Station, it is not considered appropriate, mainly from a health and safety point of view, to provide balconies within the Pelham Street and Thurloe Square buildings, as well as along the rear of the Thurloe Street façade, given that the buildings are located above/adjacent to live rail tracks. The apartment sizes have generally been oversized to allow for this and accords with the principles of the GLA Housing SPG.
- 8.24 There is provision for an element of amenity space to the rear of the Thurloe Square building which will be accessible to the ground floor unit. There is a further small section adjacent to the core which would provide visual amenity space divided from the private terrace. The other apartments within Thurloe Square are provided with inset balconies facing onto Thurloe Square.
- 8.25 The proposed Thurloe Street Building will have balconies associated with the apartments that have access to the mansard roof extension on the fourth floor.
- 8.26 Given the constraints of the site and the proximity to live and operational rail infrastructure, it is not practicable to provide for comprehensive outdoor

amenity space for all of the residential units. However, private amenity has been provided where possible and it is considered that the quality of internal conditions of the units will remain very high given their orientation on the site and the increased internal living space.

- 8.27 Policy CH1.d of the Local Plan aims to optimise the number of residential units delivered in new developments by taking into account the London Plan policy of housing density. There are a number of density considerations within the Intend to Publish London Plan. Policy D2 of the Intend to Publish London Plan notes that the density of the development should be proportionate to the site's connectivity to walking, cycling and public transport to jobs and services. As the proposed development complies with the requirements of Policy D6 of the Intend to Publish London Plan, it is considered that the density of the development is not an issue in this instance given the location of the scheme, meeting the housing requirements and balancing the impact of the new buildings on the surrounding environment.
- 8.28 Policy CL5 of the Local Plan requires new development to achieve good daylight and sunlight levels, requires reasonable privacy for both occupants and those surrounding the new development. The scheme also ensures that there is no harmful increase involved by the sense of enclosure to existing buildings. An External Daylight and Sunlight Report prepared by GIA provides an assessment of the effects of the proposed development against the BRE guidelines on the surrounding environment. This report concludes noting that while there are some departures from the BRE guidelines, on balance, the development is appropriate for the urban location from a daylight and sunlight perspective.
- 8.29 The Internal Daylight and Sunlight Report prepared by GIA submitted with this application provides an assessment of daylight quantity and distribution for all habitable rooms. The assessment confirms that the design of all the residential units has maximised the daylight and sunlight into rooms with full height windows across the scheme, and with taller ground to floor heights where the

daylight and sunlight may typically be more restricted. The assessment confirms that the development results in good daylight and sunlight amenity for the enjoyment of future occupants and complies with the BRE Guidance.

- 8.30 Policy CL5 of the Local Plan also requires that there is a reasonable visual privacy for occupants of the new development and for occupants of the existing properties affected by the new development.
- 8.31 The design and layout of all the proposed buildings have taken this policy into account. For example, the ground floor residential units along Pelham Street have been designed as duplex apartments to protect privacy at the ground floor level. The upper floor of the building is also set back with privacy planting along the perimeter. The Bullnose building has been designed with cladding over the glass to protect privacy for people both within the building and for people who will look into the building. The proposed development is therefore consistent with Policy CL5 of the Local Plan.
- 8.32 Overall, the proposed development will provide 50 new homes, in accordance with both the London Plan and the Local Plan policy guidance. All three policy documents promote maximum growth, on brownfields sites, in accordance with the housing design standards, while taking into account the local context. The scheme could be more ambitious in this regard and be more consistent with this policy aim but the applicant has chosen to take into account the views of local residents instead and thus are promoting a more conservative scheme.

#### Affordable Housing

- 8.33 The Intend to Publish London Plan and the RBKC Local Plan 2019 seek the 'maximum reasonable' provision of affordable housing with a minimum 'target' of 35% by reference to habitable room. The London Plan and the Intend to Publish London Plan seek a higher 50% provision on 'public land'

under which TfL-owned land would typically fall. (Policy H4(4) and Paragraph 4.4.7 of the Intend to Publish London Plan).

- 8.34 Given the size of the TfL development portfolio, the Mayor of London has incorporated into the London Plan policy and issued a Direction to the effect that the 50% target can apply on an annual basis over the whole of the portfolio and TfL does not require 50% for each and every site. In the specific case of South Kensington, the Mayor of London has confirmed through another Direction that in view of the complexities of developing this site a 35% (by habitable room) contribution towards affordable housing is acceptable.
- 8.35 Local Plan Policy CH2 requires two viability assessments comparing the residual land values, one reflecting the maximum reasonable amount of affordable housing provision on-site and the second with 100% private housing, for developments that does not provide for 35% affordable housing. Local Plan Policy CH2 also seeks supporting evidence for the exceptional site circumstances or other public benefits to justify the reduced affordable housing provision such as the conservation of listed buildings and unlisted buildings in a Conservation Area.
- 8.36 A total of 35% (based on habitable room) of the residential units will be provided as affordable housing within the site. The accompanying Viability Assessment addresses these two policies and confirms that the proposed development is providing more than the maximum reasonable affordable housing. This has been reviewed by the Council's viability advisors, BNPP prior to the submission of this application.

### Retail

- 8.37 Policy E9 of the Intend to Publish London Plan outlines that a competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported.

- 8.38 In accordance with Policy CK2 of the Local Plan, retail A1 Use classes will be protected. Local Plan Policy CF2 aims to protect all A1 ground floor uses within South Kensington.
- 8.39 Two existing retail units will be lost as a result of the proposed development to provide for access to the new residential apartments within Thurloe Street and to provide for step-free access to the District and Circle Lines within South Kensington Station. As a result, there is a slight reduction in overall retail floorspace although this includes the loss of some basement retail storage areas under Thurloe Street and the Bullnose. The slight loss on overall retail floor space is considered to necessary to enable other elements of the proposed development to be achieved, including providing for step-free access.
- 8.40 New retail floorspace (Class A) will be provided along Pelham Street and additional retail floor space will be provided within the Bullnose due to the addition of the mezzanine floor. The provision of new high-quality retail units throughout the site will improve the retail offer and protect and enhance South Kensington's status as a District Centre in the Local Plan.
- 8.41 Policy CL10 of the Local Plan requires shopfronts to relate to the buildings above and to either side to provide an attractive setting for the display of goods and to drive up the quality of the area. This policy includes requiring alterations to existing shopfronts to preserve those elements that contribute to their traditional character and requires new alterations to respect the buildings' original framework.
- 8.42 The works to the shopfronts on Thurloe Street and within the Arcade have been designed by Julian Harrap Architects who are a leading historical architectural practice. The Heritage Assessment by Alan Baxter confirms that the proposals are sensitive to the character and historic nature of the site and will ultimately enhance the ground floor spaces. The new units provided within

the Bullnose and Pelham Street follow a contemporary design approach whilst still picking up on the character of the local area. This is wholly consistent with the requirements of Policy CL5 of the Local Plan.

- 8.43 The proposed development will meet the expectations of the Local Plan through the enhanced retail provision.

Office

- 8.44 Policy E1 of the Intend to Publish London Plan states that increases to the current stock of office use should be supported. The provision of the proposed office use is supported by its location, being in the heart of South Kensington and adjacent to the station itself. Policy E1 also requires new developments to take into account the need for a range of workspaces, including lower cost affordable space.
- 8.45 Policy C02 of the Local Plan encourages a wide range of uses to foster the Borough's residential and commercial development. Policy CF5 of the Local Plan aims to ensure that there is a range of business premises within the Borough. To do so, the policy notes that the Council will permit small and medium sized offices located within the Borough except for ground level B class use within Town Centres.
- 8.46 All new B class uses providing floor space of over 100sqm is required to be flexible and capable of accommodating a range of unit sizes in accordance with Policy CF5.
- 8.47 The proposed development will result in an additional 3,247m<sup>2</sup> of office space, which will increase employment opportunities within the Borough and within a locality than benefits from the highest PTAL rating. Given this, the location of

the development is considered to be suitable for office use given its central location and close proximity to South Kensington Station.

- 8.48 The proposed development is consistent with Local Plan Policy E1 and CF5 as the office space is designed to be flexible, sized for SME occupiers and able to be sub-divided, if necessary.

Step-Free Access

- 8.49 Local Plan Policy CT1.k aims to ensure that Step-Free Access (SFA) is delivered at all underground stations within the Borough where there is a development opportunity. The proposed development, which has been designed with award winning station architects, Weston Williamson, will allow for the completion of the Step-Free programme to the District and Circle Line platforms from Thurloe Street with the next stage of the programme (not subject to this approval) extending provision to the Piccadilly Line, in accordance with Local Policy CT1.k.
- 8.50 The provision of the step free access is not only consistent with the Local Policy, it is consistent with TfL's objectives for increasing accessibility to the Underground network. The proposed SFA will provide the facilities for people of all abilities to access South Kensington having significant positive effects for the wider community and local businesses but specifically for those with disabilities that affect their mobility. This latter point is considered to be important in relation the proximity of the major cultural institutions, a world leading university and two important hospitals to whom this is the main public transport facility

Design

- 8.51 The Intend to Publish London Plan defines a ‘Tall Building’ as one of more than 30m in height (policy D4). The London Plan Policy 7.7 defines Tall Buildings as those substantially taller than their surroundings. As such, the proposed development is not defined as a “Tall Building.”
- 8.52 Policy CL12 of the Local Plan requires new developments to reflect the prevailing building height within the context, provide, for larger developments, a roofscape that reflects the context of the site. It also requires that development should seldom use height to express local landmarks, ensuring that the prevailing building height is maintained. Part b of the Policy also resists buildings that are significantly taller than the surrounding townscape.
- 8.53 Policy D3 of the Intend to Publish London Plan relates to all development and seeks to make the best use of land by following a design-led approach that optimises the capacity of sites. This policy notes that the design -led approach requires consideration of design options to determine the most appropriate form of development that responds to the site context and capacity for growth. As detailed throughout the DAS, the proposed development of the site has been through a very detailed design-led approach to bring forward a development that takes into consideration the most appropriate form, scale and massing in response to the site’s context. Policy D3 of the Intend to Publish London Plan lists a number of material considerations for proposed development. The detail listed within this Policy are outlined throughout the DAS.
- 8.54 Policy D4 of the Intend to Publish London Plan outlines that Design and Access Statements submitted with development proposals should demonstrate that the design meets the requirements of the London Plan.



- 8.55 The proposed design has been developed in consultation with RBKC's planning officers and developed through a series of pre-application meetings on design over the last 18 months as documented in the DAS. The scheme has also been presented to the Council's Design Review Panel as well as the design reviews conducted by the Mayor's Design Advocates. Both panels praised the approach taken by the architects in relation to the character and contextual nature of the scheme. The AAP commented that height of the Bullnose element of the scheme could be higher to maximise its potential and bring it into alignment with policies described above. However, this invitation was resisted by the applicant in response to the opposition from some local resident's groups. The design presented within the DAS is considered to adopt a balanced approach taking into account the feedback received from the community engagement.
- 8.56 The DAS provides a fully detailed analysis and description of the proposed development as required by Policy D4 to ensure that an adequate assessment of the proposed design can be undertaken during the determination period for the planning application.
- 8.57 Policy CL1 of the Local Plan requires all development to respect the existing context, character and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive for all.
- 8.58 Policy CO5 of the Local Plan aims to ensure that new development conserves, maintains and enhances the built heritage within the Borough. The area around the site contains a number of listed buildings, including the South Kensington Station itself and it sits within a Conservation Area. Full details of the existing historical context of the site and the buildings that surround are contained in both the Heritage Assessment and the DAS.
- 8.59 Policy CL2 of the Local Plan requires development to be of the highest architectural design quality, taking opportunities to improve the quality and

character of the buildings. The design of all the proposed buildings have been informed by the form and scale of the surrounding buildings. Every element of the proposed design has been carefully considered with regards to the existing historical context and subject to independent review from the two panels of experts referred to above.

- 8.60 An assessment of the policies listed above is provided for within the following paragraphs. The DAS should be referred to for full details of the development of the design, the rationale for building designs and details of materiality.
- 8.61 The design of the proposed Pelham Street building takes into account the context of the south side of the street and its increase in scale towards its western end and the Old Brompton Road. The proposed top floor has been set back along the length of Pelham Street and treated in a slightly different tone, reflecting the treatment of the upper floor of buildings in the local area.
- 8.62 The design of the Bullnose has been informed by the form and scale of the surrounding Victorian terraces although the height of the Bullnose is lower than those in its immediate surroundings. The height of the building has been tested throughout the design development stage. The proposed massing is assessed to be appropriate given the context of this environment.
- 8.63 The DAS details the design development and the rationale behind the proposed materials to be used on this building. The proposed Bullnose building will act as a marker and provide a greater sense of presence befitting an important transport node such as South Kensington Station, helping increase the sense of presence within the existing environment. Although the building is lower than the prevailing building heights of surrounding buildings, it is still considered to be in accordance with Local Plan Policy CL12.
- 8.64 The design of Thurloe Square is a direct response to lost historic fabric and heritage context caused by the intervention of the railway in the 19<sup>th</sup> century. This has never been properly reconciled, as mentioned in the Heritage

Statement. The building has been carefully designed to draw from its historic content and sit sympathetically alongside the Thurloe Street terrace. The ground floor units on Thurloe Square will access the Thurloe Square through separate entranceways, to reflect the existing context of the surrounding residential dwellings. The DAS details the materials to be used for this building and the design evolution of the façade.

- 8.65 The emergency fire escape exit, which forms part of this building in Thurloe Square, has been carefully designed into the ground floor façade to ensure that there are no detrimental visual effects impacting Thurloe Square and the Conservation Area.
- 8.66 In Thurloe Street, the redevelopment behind the building's façade has been designed to reflect the character of the uses behind it, while providing new good quality housing in keeping with the required standards. This is a considerable improvement on the quality of the accommodation that currently exists. The retail facades are proposed to be restored in accordance with best practice design, as detailed within the DAS. The additional mansard storey on Thurloe Street has been carefully designed and set back from the front of the façade to minimise any intrusive visual impact onto the street. The additional mansard roof is considered to be an acceptable design response and is a typical feature in this local context. The additional storey also has the benefit of providing more much needed housing for the Borough.
- 8.67 Careful design considerations have been given to the Station facing elevations which, unlike normal rear facades, will be seen from the station platforms. The DAS provides a full summary of the development of the design of these rear elevations and the materials that are proposed to be used.
- 8.68 The proposed development meets or exceeds the expectations of the Local Plan design policies. The restoration of the Thurloe Street building (including the retention of the façade) will provide for *fit for purpose*, better quality

residential accommodation. The restoration of the retail facades will restore the character of the area and maintain the historic fabric. While the proposed Pelham Street and Thurloe Square Buildings are of a contemporary design, elements of the façades have been influenced by the immediate local context. For example, the red panelling along the Pelham Street building is inspired by the façade of the oxblood building within South Kensington Station and the façade of Thurloe Square building has been inspired by the terrace of buildings within Thurloe Square itself.

#### Townscape and Visual Assessment

- 8.69 Townscape, Built Heritage and Visual Assessment (TBHVA) provides a summary of the townscape and visual impacts of the proposal on the local environment. The assessment describes the relationship of the proposed development with the surrounding environment, taking into account the setting of the Conservation Area.
- 8.70 Policy CL1a of the Local Plan requires development to contribute positively to the townscape through architecture and urban form, addressing matters such as scale, height, bulk, mass, proportion, plot width, building lines, street form, roofscape, materials and historic fabric as well as vistas, views, gaps and open space.
- 8.71 Policy CL11 of the Local Plan requires all development to protect and enhance views, vistas, gaps and the skyline that contribute to the character and quality of the area.
- 8.72 The generated views of the proposed development within the DAS have been taken from points agreed with RBKC. The Conservation Area Appraisal identifies the view towards the Bullnose, along Old Brompton Road looking west, the view towards Thurloe Street looking south down Exhibition Road as well as the view along Thurloe Square from Pelham Street looking north, all as

important views. The view of the proposed development from these points are shown within the DAS.

- 8.73 Table 6-1 and Table 6-1 of the TBHVA provides a full assessment of the likely effects of the proposed development on the townscape character, noting that the proposed development will make a major, noticeable change to the South Kensington Character Area. However, the TBHVA demonstrates that while the scale of the effect would be major, the outcome on townscape would be wholly beneficial.
- 8.74 The TBHVA concludes that while the development will have some impacts on the townscape of the Conservation Area, these impacts have been assessed to either have a minor impact or be positively beneficial. The proposed development has a distinctive character and sense of place, drawn from an analysis of the specific characteristics of the surrounding environment of the site. There would be no harmful effect on the strategic or local views, the character and quality of the townscape or the settings or appreciation of the heritage significance of the designated assets in the area. Indeed, as indicated in the DAS, the ASD can be said to repair the unfortunate effect of the railway's intervention into the historic street fabric, as further illustrated in the next section
- 8.75 Policy CL12 of the Local Plan has been described above, the policy aims to resist development that is significantly taller than the surrounding townscape which is patently not the case here.
- 8.76 All the elements of the design have been carefully considered and informed by the surrounding context. The heights of the four elements of the proposed development have been determined taking into account the important characteristics of immediate surrounding context which have been agreed at each stage with RBKC Design and Conservation Officers as well as the applicants' consultant team. Full details of the design evolution are contained

within the DAS and TBHVA. The building height is not significantly higher and indeed, is considerably lower in places, than the surrounding context and therefore is consistent with Policy CL11 and CL12 of the Local Plan.

### Heritage

- 8.77 Policy HC1 of the Intend to Publish London Plan notes that development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets significance and appreciation within their surroundings and should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the process. Policy 7.8 of the London Plan notes that developments should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate.
- 8.78 Careful consideration has been given to the context of the Conservation Area within the design of the proposals and details of the design development are contained within the DAS. The overall aim of the development is to enhance the values to the conservation area. Retaining the unlisted Thurloe Street façade and the restoration of the shop fronts will protect and enhance the character of Thurloe Street. The other elements of the proposal have been carefully considered the context of the existing architectural features of existing surrounding buildings and at every stage each element has been agreed by RBKC Design and Conservation Officers as explained throughout the DAS.
- 8.79 Policy CL3 of the Local Plan requires development to preserve and to take opportunities to enhance the cherished and familiar local scene. In doing so, Policy CL3 notes that Councils will:
- Require development to preserve and enhance the character of the Conservation Area and protect special interests within the area
  - Resist the change of use of buildings that contribute to the character of the surrounding area

- Resist substantial demolition in Conservation Areas unless -
  - i. *in the case of substantial harm or loss to the significance of a heritage asset it is necessary to achieve substantial public benefits that outweigh that harm or loss;*
  - ii. *in the case of less than substantial harm to the significance of a heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm;*
  - iii. *the building or part of the building or structure makes no positive contribution to the character or appearance of the area;*

8.80 The Thurloe Estate and Smiths Charity Conservation Area Appraisal (the Conservation Area Appraisal) notes that the South Kensington Station was developed in 1868. The residential buildings along Thurloe Street were constructed from 1845 to 1847 and the Bullnose was constructed in 1907. The Conservation Area is centred around South Kensington Station. Section 2.17 of the Conservation Area Appraisal notes that the high timber fencing along Pelham Street detracts from the values of the Conservation Area.

8.81 The buildings within the site along Thurloe Street are identified as having a positive contribution to the character and appearance of the Conservation Area. The proposal to retain the façade of this building and to restore the character of the retail shop fronts along Thurloe Street will enhance the values of the Conservation Area, being consistent with Local Plan Policy CL3.

8.82 The Bullnose is also identified to have a positive contribution to the character and appearance of the Conservation Area. The Heritage Statement notes that with the Bullnose, while the building will be demolished, the loss of the existing building will have minimal impacts on the significance of the listed station. The replacement building is built to a higher quality of architecture, design and responsiveness to its location and existing context. The Heritage Statement also notes that overall, the loss of the existing building and the replacement with the proposed building will result in an enhancement to the Conservation

Area. As such, the demolition of the Bullnose is consistent with Local Plan Policy CL3 in that the *substantial public benefits that outweigh that harm or loss* (in accordance with the NPPF).

- 8.83 The rear elevations of buildings make an important contribution here to the historic and architectural character of the Conservation Area. Careful consideration has been given to the development of the rear of both the new building along Pelham Street and the refurbished building along Thurloe Street as well as the rear of the Bullnose. Full details of the proposed materials to be use on the façade and the proposed massing are contained within the DAS.
- 8.84 The roof lines of all the buildings within the site have been carefully considered in relation to the existing local context. The DAS outlines how the height of the proposed buildings have been determined based on an assessment of the existing context, particularly in relation to the Bullnose and Pelham Street.
- 8.85 With regards to the retail units on Thurloe Street and the Arcade, three of the retail facades are original (no's 20 Thurloe Street and no's 4 and 6 South Kensington Station). Specialist heritage architects, Julian Harrap Architects LLP, have been engaged to provide the specific architectural design of the restoration of the shopfronts along Thurloe Street and within the Arcade. Their design is presented within the DAS. The result of their work is that the shopfronts are protected and restored in accordance with their historic associations and best practice.
- 8.86 The proposed restoration is consistent with Policy CL3 as the proposed restoration will preserve and enhance the character of both the listed and non-listed retail frontages.
- 8.87 The Conservation Area appraisal notes that the oxblood tiled building and the arcade were constructed following the completion of the District Line Connection at the Station (1905/6) and the accommodation of the Piccadilly Line. The proposed development restores the facades within the Arcade and



retains the original ox-blood façade. The iron signage above both entranceways to the station will also remain.

- 8.88 The Heritage Statement provides an assessment of the likely impact of the proposed works on the heritage assets within the site boundaries and in the immediate area. Full details of the heritage impacts can be found within the Heritage Assessment.
- 8.89 In summary, the Heritage Statement notes that the proposed development is a contemporary scheme where each element of the development has been thought about in response to the existing historical context, as well as the surrounding environment. The refurbishment of the Station Arcade and the retail frontages along Thurloe Street as well as the retainment of the Thurloe Street façade have significant positive benefits in regard to preserving the heritage of the area. It also notes that the careful and consistent detailing within the design enhance the sense of place in and around the Station in a way that will enhance the setting of many of the adjacent listed buildings and historic streetscapes, while enhancing the Thurloe and Smith Charity Conservation Area.
- 8.90 The proposed development has been the subject of consultation with Historic England who have supported the principles of the development and welcomed the approach taken and the enhancement of the heritage elements of the scheme. Historic England confirmed that that the proposed works have clearly been through an extensive period of review already and that there is a commitment to provide a high degree of design quality, developed with consideration given to the historic environment locally. It is worth noting that the pre-application consultation was undertaken prior to further revisions being made to the scheme including the reduction in the height of the bullnose and the design improvements to the Thurloe Street mansard extension.

- 8.91 The proposed South Kensington ASD provides a contextual design solution which complements and enhances the character and appearance of the listed Station.
- 8.92 The proposed development is consistent with the London Plan, the Intend to Publish London Plan and the Local Plan, by enhancing the character and values of the Conservation Area.
- 8.93 In terms of consistency with the NPPF and both strategic and local plan policies, the proposed ASD will lead to a less than substantial harm to the significance of the listed buildings. The public benefits of the proposed development are significant (as noted in the Socio-Economic Benefits Statement). These are associated with the delivery of step free access, additional residential accommodation (including affordable homes), new retail and commercial space, benefits to townscape and the enhancement of the character of the area, consistent with the provisions of the NPPF<sup>4</sup> and other related planning and conservation policies.

#### Archaeology

- 8.94 Policy HC1D of the Intend to Publish London Plan outlines that developments should identify assets of archaeological significance and use this information to avoid harm or minimise it through appropriate mitigation.
- 8.95 Policy CL4 of the Local Plan requires a desktop Archaeological Assessment to be undertaken for all major developments within Archaeological Priority Areas.
- 8.96 While the site is not within an Archaeological Priority Area, given that the proposed works involve some excavations, an Historic Environment Assessment (HEA) is submitted with this planning application.

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<sup>4</sup> Paragraph 196 of the NPPF

- 8.97 The HEA concludes that the site has very limited potential of finding archaeological remains of significance. The report recommends that a watching brief is in place for the management of the site during construction. This measure will ensure that if an item of archaeological significance is found during any excavation works, the appropriate mitigation can be applied in accordance with Policy HC1D of the Intend to Publish London Plan.

Landscaping/Public Realm

- 8.98 Local Plan Policy CO4 aims to provide for an engaging public realm. Given the ownership of the public realm, there is limited ability for the applicant to directly enhance the public realm around the South Kensington Station. However, discussions have commenced with RBKC with regards to potential improvements that could be made to the piazza at the southern entrance to the South Kensington Station and within the pedestrian subway connecting the station to the cultural institutions This will be the subject of continued discussions with the Council.

Basements

- 8.99 Policy CL7 of the Local Plan notes that among other things, basements may not comprise more than one storey, not involve excavation under listed buildings, not introduce a light well, include a sustainable drainage system and be protected from flooding. The retail use within the basement of the Thurloe Street building is existing. The proposed development will result in changes to the layout and access points to the basement. As such, the proposed changes to the basement are consistent with the requirements of Policy CL7.

Accessibility

- 8.100 Policy D7 of the Intend to Publish London Plan requires developments to provide suitable housing and genuine choice for London's diverse population,

including disabled people, older people and families with younger children. At least 10% of dwellings are required to meet the M4(3) standards for wheel chair user dwellings. All other dwellings are required to be M4(2) adaptable dwellings.

- 8.101 A summary of the access arrangements for each part of the proposed development is contained within the DAS. The summary includes how the proposed development meets the accessibility requirements and where areas of the proposed development can be adapted in the future.
- 8.102 Section 8.2 of the DAS outlines how the proposed development will meet the London Plan (2016) requirements to provide for 10% of new dwellings to meet the Building Regulation requirement M4(3) 'wheel chair user dwellings.' 90% of the proposed dwellings will be designed to meet the building regulations requirement M4(2) 'accessible and adaptable dwellings.' The wheelchair user dwellings will be distributed throughout the development. Further details of the proposed distribution within the development is contained within the DAS. Providing additional accessible dwellings within the proposed development will ensure that people of all abilities are able to live, work and play within the Borough.
- 8.103 The proposed cycle storage facilities provided within all the buildings will have step-free access. 5% of cycle parking spaces will be easily accessible and larger to accommodate larger adapted cycles or bicycles.
- 8.104 The proposed development therefore meets the requirements of the London Plan with regards to accessible buildings.

#### Parking and Transport

- 8.105 A Transport Assessment is submitted with this application. It outlines the existing environment in terms of transport and parking as well as an

assessment of the proposed development. This document should be referred to for a more detailed assessment of the impact of the development with regards to transport.

- 8.106 The proposed development has excellent public transport accessibility and its improvement as secured through this scheme will encourage the wider and more comfortable use of these public transport facilities. This will apply for the future residents and future occupiers of the office building. As the proposed development has the highest PTAL level possible, a car-free development is proposed which is completely consistent with the policy direction outlined in Policy C03 of the Local Plan. No parking on the site or on-street for any of the uses is proposed due to the close proximity to the South Kensington Station.
- 8.107 Policy T6 of the Intend to Publish version of the London Plan promotes car free development, noting that car-free should be the starting point for all development proposals in place that are well connected to public transport. The site has the highest possible PTAL rating. The future occupiers of the ASD will have step free access to the District and Circle Lines within less than one minutes' walk. Therefore, the development is consistent with both Policy T6 A and B.
- 8.108 No accessible parking is provided within the development. This is due to the high PTAL rating for the site and the installation of step free access. People who live within the development in the future will have the best possible access to public transport. For this reason, it is not considered necessary that accessible parking is provided within the development.
- 8.109 Policy CT1 of the Local Plan aims to improve alternatives to car use, requiring all new developments to be permit-free and require car parking to be at or below the car parking standards. Guidance note 20.3.5 of the Local Plan states that low or zero car parking is encouraged.

- 8.110 The proposed development is consistent with Policy GG2 of the Intend to Publish London Plan as it encourages 100% of all trips to be sustainable, providing for a car-free development.

Cycle Facilities

- 8.111 The Intend to Publish London Plan notes that cycling facilities should be designed in accordance with the London Cycling Design Standards. Table 10.2 sets out the minimum cycle parking standards. The Royal Borough of Kensington has been identified as an area where higher cycle parking standards apply. An assessment of the proposed ASD against the Intend to Publish London Plan requirements is outlined below. While it is noted that the Intend to Publish version of the London Plan is not yet adopted, this plan presents the most up to date guidance, which is why these standards form the basis for this assessment.
- 8.112 Policy CT1 of the Local Plan requires cycle parking and showering facilities in new developments.
- 8.113 Table 4.1 of the Transport Assessment outlines the cycle parking numbers for each of the different land uses within the proposed development as well as the proposed shower facilities and lockers. The development will result in a total of 157 long term cycle parking spaces and 110 short term cycle parking spaces. This is compliant with the London Plan Standards.
- 8.114 A total of 36 cycle parking spaces will be provided within Thurloe Street for residential use. An additional 5 spaces will need to be provided within the street to service the A Class use. One shower and four lockers will be provided for those who are cycling to work.
- 8.115 A total of 23 long stay cycle parking spots will be provided within Thurloe Square building for residential use.

- 8.116 A total of 67 long stay cycle parks will be provided within Pelham Street. 33 are for residential use and 34 for commercial use. The two areas will be separated. Five showers and 24 lockers will also be provided within the commercial facilities.
- 8.117 A total of 26 long stay cycle parking spots will be provided for the Bullnose, within Pelham Street. This will be accessed via Pelham Street. Four showers and 19 lockers are proposed to be provided within the Pelham Street Building.
- 8.118 A total of 110 short stay cycle parking for the proposed development will be provided in the form of tubular racks on the street as shown on the site location plan.
- 8.119 The proposed cycle parking facilities for the development is consistent with the requirements of both the Intend to Publish London Plan and the Local Plan.

#### Servicing

- 8.120 Policy CE3 of the Local Plan requires developments to provide for innovative well-designed, functional and accessible refuse and recycling storage spaces which allow for the ease of collection.
- 8.121 Policy CR7 of the Local Plan requires servicing facilities to be well designed that are sensitively integrated into the development. As such, servicing activities that do not give rise to congestion are encouraged. The policy notes that:
- Developments should require sufficient onsite parking to accommodate the number and type of vehicles likely to be generated without manoeuvring on the highway
  - Require a Servicing Management Plan
  - Where developments cannot provide on-site servicing, demonstrate that the proposal can function satisfactorily without giving rise to adverse impacts on traffic congestion, pedestrian safety, amenity or impact to bus routes.

- 8.122 The Transport Assessment (TA) submitted with this application details the proposed servicing requirements for the development. A loading bay will be provided for the development along Pelham Street to mitigate the effects of the servicing of the Bullnose and the new office and retail uses within the proposed Pelham Street Building. The loading bay would be accessible from Old Brompton Road with an egress via Pelham Street, in an eastbound direction.
- 8.123 The servicing facilities for the Bullnose are provided within the Pelham Street building and this is considered to be the most efficient use of space given the limited ground floor of the Bullnose and the desire to maximise active retail frontages. Providing for a consolidated waste collection point on Pelham Street, reduces possible congestion during waste 'pick up' hours.
- 8.124 The proposed loading bay on Pelham Street will meet the requirements of Policy CR7 of the Local Plan in that it will minimise impacts on traffic congestion and pedestrian safety.
- 8.125 A Framework Delivery and Servicing Plan (FDSP) is also submitted with the Planning Application. This assessment will guide the development of a full detailed servicing plan that will be secured via a planning condition should the application be granted.
- 8.126 Servicing of the residential properties on Thurloe Square and Pelham Street is anticipated to be minimal and is proposed to take place on single yellow lines as per the arrangements for the existing properties on these streets. Servicing arrangements for the Thurloe Street residents will remain unchanged.



Sustainability

- 8.127 Policy CE1 of the Local Plan outlines the requirements to address climate change by reducing carbon dioxide emissions. Local Policy CE1 also requires BREEAM to demonstrate that non-residential development of 1000m<sup>2</sup> or more meets BREEAM *Very Good* standards.
- 8.128 The Intend to Publish London Plan sets the vision for a zero-carbon City.
- 8.129 An Energy and Sustainability Strategy is submitted with this application. It outlines the energy savings and provides an assessment against BREEAM. Section 3.5 of the Energy and Sustainability Strategy outlines the proposed development's compliance with National, Local and Regional Policy. The Proposed Development will achieve significant carbon reductions of 65.2% in the residential areas of Pelham Street, Thurloe Square and Thurloe Street buildings, and 44.6% reduction in the domestic areas in the Bullnose, Pelham Street and Thurloe Street.
- 8.130 The Arcade retail units are exempt from the requirements due to the Grade II listing as are the Thurloe Street retail units given the difficulties with bringing these buildings up to the minimum standards while maintaining the historic fabric.
- 8.131 The Energy and Sustainability Strategy requires that the proposed development is consistent with the Policy Framework. A Carbon Offset payment towards zero carbon buildings will be required to achieve consistency with policy guidance given the number of historic buildings contained within the application site.

Air Quality

- 8.132 The Intend to Publish London Plan Policy SI1 aims to improve air quality. Development proposals must be at least air quality neutral.
- 8.133 The entire RBKC boundary is designated as an Air Quality Management Area. Accordingly, an Air Quality Assessment has been submitted with this planning statement as per the requirements of Policy CE5 of the Local Plan. This provides an assessment which is in accordance with the Local Plan and the NPPF requirements.
- 8.134 The Air Quality Impact Assessment prepared by SWECO provides an assessment of the potential impacts on air quality during the construction of the proposed development as well as an assessment of the anticipated air quality once the proposed development is complete.
- 8.135 The aim of the study was to assess the suitability of the application site for residential accommodation and to determine the potential impact from the proposed development on the surrounding area. The assessment considers existing road traffic emissions and road traffic emission from the proposed development.
- 8.136 In summary, the assessment notes that during construction, dust mitigation measures should be used in accordance with a Construction Management Plan. The recommended dust control measures within the Air Quality Impact Assessment will, in the opinion of SWECO, sufficiently control the dust generated during the construction programme to an acceptable level.
- 8.137 The proposed development does not include any on-site energy generation which has associated NOx emissions, therefore no building emissions have been considered in the assessment. With regards to the Air Quality neutral assessment, it was concluded that the transport emissions were significantly

below the benchmark emissions and therefore no mitigation is assessed to be required.

- 8.138 Therefore, the proposed development is considered to be consistent with Policy S11 of the Intend to Publish London Plan Policy S11 as the proposed development has been assessed to be air quality neutral.

Flood Risk

- 8.139 Policy SI 12 of the Intend to Publish London Plan aims to ensure that flood risk is minimised and mitigated within development proposals and that the residual risk is assessed. Policy CE2 of the Local plan requires developments to address and reduce flood risk and its impacts.

- 8.140 The Flood Risk Assessment (FRA) submitted with this application confirms that the site is within Flood Zone 1 (less than a 1 in 1000 annual probability of river or sea flooding). As such the FRA concludes that the site has a very low probability of flooding from fluvial and tidal sources. The FRA also notes that the proposed land uses at the site are acceptable in terms of the NPPF policy guidance and that the *Sequential Test* as set out in the policy has been passed.

- 8.141 The FRA also provides a desk top based assessment of the capacity of the drainage network and the risk of flooding from sources other than fluvial or tidal sources. There are no artificial sources of flooding within the immediate vicinity of the site. This assessment notes that the site does lie in an area that is susceptible to ground water flooding. However, through reviewing historic boreholes, no groundwater has been found at the site. The assessment concludes by noting that while the risk of flooding from groundwater is low, it recommends that all basements are adequately waterproofed.

- 8.142 With regards to surface water runoff and the associated flood risk, the FRA notes that the lower underground station and the main entrance to the station

from Pelham Street have a high risk of surface water flooding. The FRA provides details of how this risk can be mitigated through the proposed design to ensure that the risk is reduced to a low level.

- 8.143 Therefore, as there are no additional impacts on flooding as a result of the proposed development, the scheme is consistent with the requirements of Policy CE2 of the Local Plan.

#### Noise and Vibration

- 8.144 Policy D3 of the Intend to Publish London Plan and Policy 7.15 of the London Plan note that development proposals should help prevent or mitigate the impacts of noise and poor air quality.

- 8.145 The Noise and Vibration assessment submitted with the application provides an assessment of the noise and vibration impacts generated by the proposed development following occupation. The assessment does not consider the noise and vibration levels generated during construction. It is noted within the assessment that there is no requirement to present a construction noise and vibration assessment at the planning stage as this will be controlled by conditions and agreed with the Council's EHO team.

#### Construction Effects

- 8.146 Policy CE6 of the Local Plan notes that both during construction and operation, Council will carefully control the impact of noise and vibration that has an impact on amenity.

- 8.147 A Construction Environmental Management Plan (CEMP) is submitted with the application. It forms the basis for the assessment of the construction impacts. This document refers to the RBKC Code of Practice for Construction. The CEMP

will be updated prior to the commencement of construction once the Contractor has been appointed.

- 8.148 The CEMP submitted with the application outlines how the construction of the proposed development will be managed over the construction period, including how the buildings will be demolished, how the site will be serviced during construction and how noise and dust effects of construction will be mitigated.
- 8.149 A number of Construction Traffic Management Plans (CTMP's) are submitted with this application. They provide details of the proposed development 'sites', construction phasing, proposed site deliveries, temporary loading and unloading bays during construction and proposed construction traffic routes to access the site. The provision of a series of CTMPs was agreed with the Council as part of the pre-application process and they reflect the different nature of the sites within the application boundary and specific constraints and measures proposed therein. These documents should be referred to for further details regarding the management of traffic during construction.
- 8.150 Where possible, works will be restricted to certain time periods. Due to the proximity of working near active rail lines, a number of key activities will need to be delivered to the site during the London Underground engineering hours (i.e. during the piling works to construct the Pelham Street and Thurloe Square podiums). It is acknowledged that these types of works can be noisy. The CEMP outlines methods to mitigate noise generated during these works.
- 8.151 The construction site office will be based at track level near 68 Pelham Street, which is a TfL site. The CEMP contains the full address. A dedicated and separate access to this building will be provided as agreed with TfL. Locating the site office here will minimise the noise generated from the use of the site office in comparison to locating the site office at street level.

- 8.152 Policy CE3(h) of the Local Plan requires the preparation of a Site Waste Management Plan for demolition, excavation and construction waste.
- 8.153 The demolition of the Bullnose and the building behind the façade along Thurloe Street will require demolition. The CEMP outlines the principles for the demolition of both the Bullnose and the Thurloe Street Building and notes that the contractor will prepare specific method statement. Should Planning Permission be granted, the submission of a detailed Site Demolition/Site Waste Management Plan will be secured via a planning condition.
- 8.154 The proposed works, as detailed within the CEMP, will be undertaken in such a way to minimise the impacts of the construction activity on amenity, while noting that there will be times (such as during night works) where construction activities will occur and will need to be mitigated as much as possible to ensure that the effects on the local residents are minimised.
- 8.155 The CEMP outlines methods for communicating with neighbours and local residents. These methods will help to ensure that the local residents are notified of noisy activities, such as night works.
- 8.156 A final CEMP, CTMP and SWMP (amongst other standard pre-commencement condition requirements) will need to be submitted prior to the commencement of works should planning permission be granted for this development.

#### Contaminated Land

- 8.157 Policy CE7 requires the potential risks associated with contaminated land to be adequately mitigated before development proceeds. This includes a requirement to submit a desk top study and preliminary risk assessment and remediation strategy where relevant.

- 8.158 A desk top study is submitted with the Planning Application. The desk top assessment concludes by assessing the risk of finding contamination at the site is low and it is not anticipated that remediation will be required. However, the report does recommend that a ground investigation is undertaken to allow for the risks associated with any potential past activities to be determined. Measures to contain any contamination found on the site can then be determined.

Ecology

- 8.159 Policy CE4 requires developments to create opportunities for attracting biodiversity and habitat. Submitted with this application is a Bat Roost Assessment. This notes that an assessment of the buildings on the site was carried out and that no roosts were identified, or bat activity recorded. The report concludes that the site is not considered to be an important site for the bat population. The Report recommends that no further surveys are to be carried out.
- 8.160 Policy G7 of the Intend to Publish London Plan notes that developments should protect existing trees, while noting that if it is proposed to remove a tree, an adequate replacement shall be planted.
- 8.161 The proposed development will result in the loss of two trees as a result of the proposed location of the servicing bay. These two trees will be replaced, with the exact location of the replacement trees will be agreed with RBKC.

## 9. LISTED BUILDING CONSENT ASSESSMENT

9.1 Section 7 of the Planning (Listed Building and Conservation Areas) Act 1990 (LBCA Act) provides that, subject to the following provisions of the Act, no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.

9.2 Section 10 of the LBCA Act notes that a statement about the design principles and concepts that have been applied to the works as well as a statement about how issues relating to access of the buildings have been dealt with must be submitted with the Listed Building Consent.

9.3 The proposed development impacts upon two listed buildings being, South Kensington Station and the Subway. Alterations to the listed aspects of the South Kensington Station include:

- Restoration of the original retail facades (Nos 4, 6 and 10) within The Arcade.
- Alterations to the Ticket Hall to provide for Step-Free Access.
- Refurbishment of the non-original retail frontages within Arcade, including the replacement of the glazing.
- Realignment of the glass barrier separating the unpaid and paid ticket hall to the north of the ticket hall
- Extension of the sealed balustrade against the revetment wall on the north of the unpaid ticket hall.

9.4 A full description of the proposed works within the remaining areas of the South Kensington Station that are not noted to be of significance are described within the DAS.



- 9.5 The proposed development under the Thurloe Street building, will result in the creation of two new retail units at the basement level that will face into the subway. The retail units are proposed to be accessed via the subway. This change will result in two new retail facades within the subway and the removal of some of the tiling within the subway. Other minor changes to the subway include changes to the entrance to the subway at the Ticket Hall. Full details of the proposed development work to the subway are detailed within the DAS.

*Assessment*

- 9.6 The Heritage Statement submitted with the application provides an assessment of the significance of the proposed works on the Heritage Assets in accordance with the NPPF guidance. The Heritage Statement has assessed each element in terms of its significance followed by an assessment of the significance of the proposed modifications on each of the heritage assets. Reference should be made to the Heritage Statement for full details of the Heritage Impact Assessment.
- 9.7 With regards to the Arcade shopfronts, only nos 4, 6 and some aspects of 10 have survived relatively intact since their construction in 1097. The other shopfronts have undergone significant modifications. The proposed restoration seeks to achieve uniformity of architectural composition in the individual shopfronts modelled off the remaining original shopfront, no 6. Each shopfront will have a single glazed entrance door set back from the shopfront and defined by curved glazing to either side. The shopfronts will need to be significantly modified to restore the character of each to its original condition.
- 9.8 As noted previously within this document, specialist heritage architects, Julian Harrap Architects LLP, have been appointed to provide the comprehensive design for the restoration of the shopfronts. This was to ensure that the design of the restoration was researched and undertaken with the utmost care so that

the original design features and character of the facades could be respected insofar as it is possible.

- 9.9 The Heritage Statement notes that replacement of the existing modern and mid-twentieth-century shopfront units with historically appropriate timber and bronze framed shopfronts as per the Julian Harrap design, is a heritage benefit, constituting a significant enhancement to the significance of the listed station Arcade.
- 9.10 With regards to the modifications to the subway, the Heritage Statement notes that the new retail units will result in the loss of a small amount of fabric from the subway walls. However, in the context of the 480m long tunnel, this loss will be negligible.
- 9.11 The proposed works associated with the Listed Building Consent will result in the enhancement and restoration of the key items of significance within the South Kensington Station and the subway, resulting in a positive impact on the character of the buildings.

## 10. SUMMARY OF COMMUNITY CONSULTATION

- 10.1 A number of meetings have been held with the Community Working Group (CWG) and other residents' groups through the development of the design. Four public exhibitions have been held to discuss the design as it developed and were attended by over 1,000 people.
- 10.2 Meetings have also been held with a number of museum groups including the Goethe Institute, the Royal Commission Imperial College, the Natural History Museum and the Victoria and Albert Museum. Full details of the consultation that has been undertaken is presented in the SCI.
- 10.3 The SCI confirms that responses to the consultation have been varied, with reservations largely focusing on the architectural style, height, scale, management and traffic. However, the SCI confirms that there is wide support for the delivery step-free access, the delivery on affordable housing, enhancements to the heritage elements of the scheme and the resulting improvements and enhancements to the local area.
- 10.4 Consultation has been extensive on this application and the breadth and depth of the local community engagement has been welcomed by officers and members at RBKC. Revisions have been made to the scheme as a result of this consultation process and it is therefore considered to have been an informative and positive process resulting in a scheme that is supported by the Planning Officers.

## **11. PLANNING OBLIGATIONS & SECTION 106**

- 11.1 Discussions are ongoing with officers at the Council regarding the nature of the obligations associated with the proposed development. The applicant is exploring the opportunity to work with the Council and other landowners to deliver enhancements to the public realm on the south side of the station which is currently hard landscaped with limited planting. Additionally, the potential improvements to the subway that links the station to the institutions to the north is also being explored and an agreement to undertake a review with the Council will be contained within the Section 106 Agreement.

## 12. CONCLUSIONS AND RECOMMENDATIONS

- Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals for development to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- This Statement has assessed the development against the Development Plan and all other material considerations, and it is considered the proposals subject to this application fully accord with planning policy.
- The proposed development has been progressed through extensive discussions with stakeholders including the RBKC, LUL, and Historic England. The design has been endorsed by these bodies as well as two independent architectural design panels who have both supported the scheme design.
- The proposals have also been subject to extensive public consultation as detailed within the accompanying SCI supporting this application. The proposed development has been amended and adapted to reflect this consultation process.
- The proposed redevelopment of the site will deliver a new mixed-use development of strategic importance to this part of London. The proposed land uses reflect regional and local policy and will result in significant retail and commercial improvements within the South Kensington District Centre.
- The proposed development facilitates the delivery of the step free access from the District and Circle line bring with it significant social, economic and cultural benefits given the site's proximity to the world-famous institutions, museums, university and important local hospitals which the station serves.

- In terms of residential floorspace, the proposal will deliver a range of high-quality new homes of with a variety of unit size and tenure. The delivery of 35% on-site affordable housing within South Kensington represents an acknowledgement of the pressure on social housing with the Borough.
- The proposed development has been designed to a very high quality by three award winning architects. The design complements, reflects and has been informed by the historical character of the local area. Existing buildings and heritage fabric will be retained and enhanced to the fullest extent possible to fully comply with the requirements of planning and conservation policy. In addition, the retention and restoration of the historic features will enhance the sense of arrival at this important public transport facility.
- In terms of consistency with the policies that relate to Conservation and Listed Buildings it is concluded that the proposed development will lead to a less than substantial harm to the significance of the listed buildings and historic fabric. However, the public benefits that flow from this scheme are significant and more than significant to outweigh any harm to heritage fabric.
- Furthermore, the enhancement of the townscape enhancement to the character of the area are consistent with the provisions of the NPPF<sup>5</sup> and other related planning and conservation policies.
- In summary, it is considered that this planning application accords with the adopted planning policies at the national, regional and local level and permission ought to be granted.

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<sup>5</sup> Paragraph 196 of the NPPF

**Appendix**

TfL Correspondence - 10 August 2019

**From:** Craig Graeme  
**Sent:** 10 August 2019 19:12  
**To:** Nicholas Gould <[nicholas@nicholasgould.com](mailto:nicholas@nicholasgould.com)>; Amanda Frame <[amandaframe@outlook.com](mailto:amandaframe@outlook.com)>; Sophie Blain <[sophieandreae@btinternet.com](mailto:sophieandreae@btinternet.com)>; Laura Mosedale <[lpmosedale@me.com](mailto:lpmosedale@me.com)>; Caryl Harris <[caryl@creativeinterpartners.co.uk](mailto:caryl@creativeinterpartners.co.uk)>; [guy@bondonneau.com](mailto:guy@bondonneau.com); [michael@goar.net](mailto:michael@goar.net); [michaeledickinson\\_uk@yahoo.co.uk](mailto:michaeledickinson_uk@yahoo.co.uk)  
**Cc:** Anderson Scott <[ScottAnderson1@tfl.gov.uk](mailto:ScottAnderson1@tfl.gov.uk)>; Thompson Amy <[AmyThompson@tfl.gov.uk](mailto:AmyThompson@tfl.gov.uk)>; Patel Kumud <[KumudPatel@tfl.gov.uk](mailto:KumudPatel@tfl.gov.uk)>; Claire Brisby <[claire.brisby@gmail.com](mailto:claire.brisby@gmail.com)>  
**Subject:** RE: South Kensington Around Station Development

Dear Mr Gould, Mrs Frame, Ms Andreae, Ms Mosedale, Mrs Harris, Mr Bondonneau, Mr Goar and Mr Dickinson,

Thank you for taking the time to write again to express your views and raise some questions, I very much appreciate the time you all are investing and your feedback is valuable. I unfortunately arrived at the public exhibition after many of you had visited. Thank you to those that came along. For those of you who were unable to attend the exhibition the boards are available on the project website [www.southkensingtonstation.co.uk](http://www.southkensingtonstation.co.uk).

I can assure you that neither we nor Native Land have abandoned the commitment to work with the local community. We and Native Land most certainly do not regard the local community as a problem to be overcome as you suggest in your letter. I have always been clear that we need to work with and involve the community in our plans, and that remains the case.

The 2016 development brief provides a framework of principles for the Around Station Development (ASD) and is a mechanism for providing guidance to future developers. Its purpose is to establish a set of broad parameters for the ASD whilst not unduly fettering the design process and enabling future proposals to take account of planning policies and process, including further community consultation. As you know, the brief was not a final planning application and was not adopted by RBKC as a supplementary planning document.

As I have said previously, the brief was always intended to set the scene for the development, describe the history and context, and capture the key stakeholders' priorities and objectives for the station. It did not go into detailed design.

We and Native Land are using the brief in the manner we said we would. Our proposals are informed by the Brief and the principles described within it. In so doing our proposals include the provision of the homes and workspaces that London needs, respond to planning policies, and fit the context and quality of the local area, including the station. We are consulting widely with the local community on our initial proposals informed by the Brief.

We will reinvest our share of any development profits and associated revenues into the wider transport network, keeping it safe, reliable and affordable. Native Land's profits will be returned to its shareholders. In partnership, we and Native Land intend to retain



long-term ownership of parts of the finished development, so some of the returns that we will receive from the development will be in the form of rental revenues. Our long-term focus is, I believe, a very positive element of the development.

As you know, since 2016 we have been consistent in our approach that the Circle and District line step-free-access and the new station entrance will be delivered together with, and as part of, the ASD. Our joint venture will deliver these works in partnership, and we will apply for permission for all these in one application. Following your feedback, we took the opportunity to set this distinction out more clearly in the recent public exhibition, so thank you for your response on this.

By agreement between ourselves, TfL and Native Land together have appointed different architects for different parts. Rogers Stirk Harbour + Partners is the architect for the development works part of the ASD. Weston Williamson is the architect for the step-free-access and the new station entrance part of the ASD. The reason for this selection is to ensure that each element of the scheme benefits from the input of architects with the requisite specialist expertise.

These ASD works are separate but co-ordinated with the capacity upgrade works that TfL (London Underground) is already planning to undertake. As you are aware, the capacity upgrade works have already received Listed Building Consent and include a ticket hall extension, platform reinstatement, and two lift shafts that link the ticket hall to the platforms.

Thank you for reiterating and clarifying your observations about the architectural proposals. I know the team has discussed some of these with you already, however you are rightly challenging us on our rationale. Some of these matters have been responded to in our meetings and at our recent public exhibition, but nonetheless the team will further review these matters and respond to you and to the wider community.

We look forward to continuing to work with you to repair the station and its surrounding streets, and improving the experience for the people that use the station. I also look forward to seeing you again at future meetings and events.

Regards,

Graeme

**Graeme Craig**

Director of Commercial Development | Transport for London

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