



INQUIRY STATEMENT

**Appeal reference: APP/K5600/W/22/3300872 in relation to:
Amended Planning and Listed Building Consent Applications: PP/20/03216 &
LB/20/03217 | Mixed use development of the land around South Kensington Station. South
Kensington Underground Station; 20-48 (even) and 36-46 (odd) Thurloe Street; 1-9 (odd)
Pelham Street; 20-34 Thurloe Square, London SW7 2NA.**

My name is Benedict Dewfield-Oakley and I am conservation officer for SAVE Britain's Heritage, a national heritage charity which fights for historic buildings and sustainable reuses. SAVE is here today as an interested party to the inquiry and I will now read the statement we submitted to the planning inspectorate on 20th December 2022 ahead of the inquiry.

SAVE Britain's Heritage objected to this planning application and its amendments in its letter of 10th September 2020 in relation to the original application, and 26th March 2021, 24th September 2021 and 12th November 2021 in relation to the subsequent amendments. Royal Borough of Kensington and Chelsea Council (**RBKC**) refused the application on 13th December 2021. We now write as an Interested Party in relation to the appeal to reiterate our strong objection to the scheme.

RBKC's refusal of the above planning application was based on three grounds. The first related to the level of harm that the height, massing and architectural design of the proposals would have on the Thurloe and Smith's Charity Conservation Area (TSCCA), Grade II listed South Kensington Underground Station and the settings of Grade II*listed Pelham Place and Grade II listed Thurloe Square which would fail to preserve the character and appearance of the Conservation Area and special architectural interest of the listed buildings. This harm was considered not to be outweighed by public benefits. These outcomes are all contrary to the adopted RBKC Local Plan and the National Planning Policy Framework.

SAVE Britain's Heritage has objected in each of its letters of objection on the basis of the scale of development and extensive demolition proposed, which have remained fundamental elements of the scheme through all its iterations. We therefore remain of the view that the proposed scheme would substantially harm the fabric and setting of the Thurloe and Smith's Charity Conservation Area, the Grade II listed station and the historic character of South Kensington itself.

In reiterating our objection to the scheme, we offer the following summary of our views.

Substantial harm to the Conservation Area

SAVE has objected to all three iterations of this scheme on the basis that the degree of demolition and scale and uniform design of new development proposed will be substantially harmful to the Thurloe and Smith's Charity Conservation Area.

The demolition of the Grade II curtilage listed bullnose, the gutting and facading of the locally listed Thurloe Street terrace and the erection of large scale and uniformly designed buildings in the immediate settings of multiple listed buildings will see the rich architectural character and historic significance of the conservation area and Grade II listed South Kensington station itself substantially and irreversibly harmed. As prescribed under Paragraph 18 of the government's NPPG, we consider this degree of harm is derived from the substantial impacts of the proposals on the fabric and setting of these heritage assets and their special architectural and historic interest.

Furthermore, contrary to assertions made in these applications, we do not consider the low-rise nature of the station and the railway cutting to be an urban planning mistake, but rather a beneficial aspect which contributes to the area's historic significance and is fundamental to its character. The council's refusal of the scheme is in our view entirely justified in exercise of its duty to protect and enhance this significance and the conservation area that is designated to protect it under Section 72 of the Planning (LBs and CAs) Act 1990.

Contextual Design

Failure to respond to the context and character of the area was noted repeatedly in the council's planning officer's assessment of the scheme. Its uniformity and scale were noted as being at odds with the variety and particularity of each of the surrounding areas. In its second ground for the refusal, the Council cites this essential flaw in the proposal and, in our view, rightly bases this separate reason for refusal on it.

Public Benefits and Step Free Access

SAVE considers the public benefits identified by the applicant, including much-vaunted step-free access to the station, to be insufficient to outweigh the cumulative heritage harms of the scheme, as required by the National Planning Policy Framework (2021).

SAVE believes that step-free access could and should be achieved by a scheme whose viability does not depend on the extensive demolition of designated and non-designated heritage assets and harmfully scaled new buildings, whose design officers acknowledge relates poorly with their setting at the heart of a conservation area. It is illogical to argue that step free access can only be delivered by larger scale office buildings, a point we note was emphasised in the Local Planning Authority's opening statement to this inquiry.

Serious doubts remain over the delivery of genuine step-free access to the station since the announcement in July 2020 that TfL was putting its planned Station Capacity Upgrade permanently on hold. This included reviving the station's disused north-side platform and expanding the existing ticket hall. Without these key elements of the overall project, and no step-free access proposed to the Piccadilly Line platforms, we consider this benefit to be overexaggerated and far from deliverable in its entirety. In short, we consider this application does not by itself deliver in totality the principle public benefit stated as a key justification for the scheme.

Conclusion

For the reasons outlined above, and those stated consistently in all our previous responses during the planning process, we support RBKC's clear and justified grounds for refusing planning and listed building consent on heritage and other grounds and call on the Inspector and Secretary of State to reject this appeal.

Benedict Oakley

Conservation Officer