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**PROOF OF EVIDENCE OF PAUL VELLUET ON BEHALF OF THE PELHAM STREET
RESIDENTS' ASSOCIATION, PELHAM RESIDENTS' ASSOCIATION AND ONSLOW
NEIGHBOURHOOD ASSOCIATION**

SOUTH KENSINGTON UNDERGROUND STATION (including nos. 1 to 13 (odd) and nos. 2 to 12 (even), South Kensington Station Arcade); nos. 36 to 46 (even), THURLOE STREET, nos. 1 to 9 (odd), PELHAM STREET, nos. 20 to 34 (even), THURLOE STREET and SITES FRONTING PELHAM STREET and THURLOE SQUARE, SOUTH KENSINGTON, LONDON, S.W.7.

**APPEALS BY NATIVE LAND (KENSINGTON) LTD, SOUTH KENSINGTON PROPERTIES
LTD AND LONDON UNDERGROUND LTD**

Application references: PP/20/03216 and LB/20/03217

Appeal references: APP/K5600/W/22/3300872 and APP/K5600/Y/22/3301446

PART ONE OF TWO PARTS

(including Appendices A to D)

NOTE: Historic photographs of South Kensington Station used in this Proof of Evidence courtesy of the London Transport Museum Collection. Other photographs – not to be construed as technically verified images - by Paul Velluet, except where stated otherwise.

SUMMARY

1. This Proof of Evidence has been prepared by chartered architect Paul Velluet on behalf of The Pelham Street Residents' Association, the Pelham Residents' Association and The Onslow Neighbourhood Association.
2. My evidence on behalf of the Residents' Associations focuses on three key issues:
 - Firstly, the heights and massing of the proposals – to which specific reference is made in the Council's grounds of refusal - and their effects on the special architectural and historic interest, setting and significance of the listed station complex - specifically in relation to the surface-level and sub-surface buildings and structures, and the space above the station;
 - Secondly, the heights and massing of the proposals – to which specific reference is made in the Council's grounds of refusal - and their effects on the settings and significance of nearby statutorily listed properties and on nearby unlisted buildings identified by the Council as making a positive contribution to the historic and architectural character and appearance of the conservation area*; and
 - Thirdly, the heights and massing of the proposals – to which specific reference is made in the Council's grounds of refusal - and their effects on the character, appearance and significance of the Thurloe Estate and Smith's Charity Conservation Area.
3. In my evidence, I demonstrate that:
 - The heights and massing of the appeal proposals will fail to preserve the special architectural or historic interest and setting of the listed station and will cause substantial harm to the particular significance of the station as a designated heritage asset;
 - The heights and massing of the proposed buildings will fail to either preserve or enhance the character or appearance of the Thurloe Estate and Smith's Charity Conservation Area, and will cause substantial harm to the particular significance of the Thurloe Estate and Smith's Charity Conservation Area as a designated heritage asset;
 - The heights and massing of the proposed buildings will fail to preserve the immediate settings of the grade II and grade II* listed houses at the northern end of Pelham Place adjacent to or close to the junction with Pelham Street; the listed properties at the south-western corner of Thurloe Square; and the listed terrace at nos.15 to 18 (consec.), Cromwell Place; and
 - The heights and massing of the proposed buildings will cause harm to the particular significance of the unlisted terraces of houses on the southern side of Pelham Street; on the unlisted no. 49, Pelham Street and no. 5, Thurloe Square; on the unlisted terrace of houses, apartments and shops at nos. 25 to 45 (odd), Thurloe Street; and on the unlisted blocks of shops and apartments at nos. 23 to 25 (consec.) Cromwell

Place and at nos. 20 to 34 (even), Thurloe Street, as non-designated heritage assets – as identified by the Council as making a positive contribution to the historic and architectural character of the conservation area.

4. Through my evidence, I also demonstrate that:
 - The heights and massing of the proposed buildings will be in conflict with the relevant guidance contained in in the *National Design Guide* of January, 2021; the Council's *Building Heights in the Royal Borough Supplementary Planning Document* of July, 2021; and key aspects of the development envisaged in TfL and Deloitte Real Estate's *South Kensington Station – Around Station Development - Development Brief* of December, 2016.
5. In Section 2 of my evidence I identify the particular special architectural and historic interest of the existing, listed station complex and its setting, its significance, and its contribution and that of other buildings to the character, appearance and significance of the Thurloe Estate and Smith's Charity Conservation Area
6. In Section 3 of my evidence I identify and discuss the impacts of the proposed development on the particular special architectural and historic interest and setting of the listed station complex, on its significance, and on the character, appearance and significance of the Thurloe Estate and Smith's Charity Conservation Area
7. In this section I also refer to the development options usefully explored in the development envisaged in TfL and Deloitte Real Estate's *South Kensington Station – Around Station Development – Development Brief* of December, 2016, and specifically to those key aspects of which attracted qualified support from the local community at the time and to the failure of the proposals to adhere to most of those principles.
8. In reaching judgements on the heights and massing of the proposed buildings and their potential impacts on the existing buildings around the Appeal site and on the conservation area, I have relied substantially on the architects' finally revised, 1:200 scale sections and elevations which usefully show the relationships with the existing buildings around the site.
9. In my judgement, these sections and elevations demonstrate very clearly the excessive heights and massing of the various parts of the proposed development in relation to their respective settings and their wider context and the failure to preserve the settings of the listed station and other listed buildings in the vicinity, or to either preserve or enhance the character or appearance of the conservation area. They also demonstrate the overall substantial harm of that such development will cause to the special interest and significance of the listed station and its setting and to the character, appearance and significance of the conservation area; and the harm caused to other designated and non-designated heritage assets in the vicinity of the station.
10. In my judgement, mindful of the relevant guidance contained in paragraph 18 of *National Planning Practice Guidance*, the level of potential harm to both the character, appearance and significance of the conservation area and the special

architectural and historic interest and significance of the listed station complex is of a 'substantial' order.

11. My significant concerns about the excessive heights and massing of the proposed new development above and around the listed station and their potentially harmful effects have been reinforced by reference to the 'as existing' and 'as proposed' verified views of the proposed developments in their settings submitted by the applicants in Tavernor Consultancy's *South Kensington Around Station - Addendum to the Townscape, Built Heritage and Visual Assessment* of August, 2021 in support of their proposals – a number which were included in the officer's report to the Planning Committee.
12. My concerns are also reinforced by reference to the series of 'as existing' and 'as proposed' verified views of the proposed developments in their settings commissioned by objectors – based on the proposals as originally submitted - prepared by Rendered Image Ltd in November, 2021 on behalf of the Brompton Association, the Onslow Neighbourhood Association and the Pelham Residents Association.
13. In Section 4, I conclude that the failure to secure effective integration of new and old development in this sensitive site within the Thurloe Estate and Smith's Charity Conservation Area is reflected in:
 - The significant disparity between the height and massing of the proposed building extending around the 'bullnose' curve between Thurloe Street and Pelham Street and the height and massing of the existing, adjacent, listed station buildings and other nearby buildings of recognized value;
 - The significant disparity between the height and massing of the proposed buildings along the northern side of Pelham Street and the height and massing of the existing houses of recognized value along the southern side of the street, directly opposite;
 - The significant disparity between the height and massing of the proposed building at the corner of Pelham Street and the road leading to the south-western corner of Thurloe Square and the height and massing of the listed houses in Pelham Place, directly opposite and the height and bulk of the building of recognized value on the opposite corner; and
 - The significant disparity between the height and massing of the proposed building and the height and massing of the listed houses at the south-western corner of Thurloe Square.

And that in my judgement, these deficiencies will fail to ensure the effective preservation or enhancement of the conservation area but will also substantially harm its significance as a designated heritage asset.

14. I firmly believe that as rightly stated in the Council's reasons for refusal, the proposals are contrary to policies CL1, CL2, CL3 and CL4 of *the Kensington and Chelsea Local Plan* of September, 2029 and policies HC 1 and D3 of the *London Plan*, of March, 2021 and the relevant provisions of the *National Planning Policy Framework*. Indeed, I

consider that the proposals are also contrary to policies CL8, CL9, CL11 and CL12 of the *Kensington and Chelsea Local Plan*. I also consider that the proposals fail to have full regard to the relevant provisions relating to Context, Identity and Built Form contained in the *National Design Guide* of January, 2021.

15. Finally the proposals depart significantly from key principles contained in TfL's *Development Brief for the Around Station Development* published with substantial from the local community in 2016.

Paul Velluet

21st December, 2022.

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I. INTRODUCTION AND SUMMARY

- I.1 My name is Paul Velluet and I appear at this Inquiry on behalf of The Pelham Street Residents' Association, the Pelham Residents' Association and The Onslow Neighbourhood Association (together, 'The Residents' Associations).
- I.2 I am a chartered architect, a member of the Royal Institute of British Architects since 1975, the Institute of Historic Building Conservation since its founding in 1997, and the Society of Architectural Historians of Great Britain since 1972. I have worked in both private architectural practice and the public sector since 1973, including 14 years as a Principal Urban Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation and 13 years as Regional Architect and Assistant Regional Director in the London Region of English Heritage. Since qualification as a registered architect in 1974 my work has focused on the design of new development in historic areas and the repair, alteration and extension of historic buildings.
- I.3 In past years, I have served on both the RIBA's Planning Group and its National Awards Group – from 2013 to 2017. In my time at English Heritage, amongst other roles, I led co-ordination with London Underground in relation to the modernisation of its 'Heritage Stations'; served as the lead in London on the provision of equal access for those with disabilities within and to historic buildings and sites; chaired the Working Group for the preparation of *The Palace of Westminster - Westminster Abbey World Heritage Site Management Plan*. Amongst other roles, I currently serve as a member of the Guildford Cathedral Development Advisory Board. Full particulars of my qualifications and experience are contained in Appendix A attached at the end of this proof.
- I.4 My evidence on behalf of the Residents' Associations focuses on three key issues:
- Firstly, the heights and massing of the proposals – to which specific reference is made in the Council's grounds of refusal - and their effects on the special architectural and historic interest, setting and significance of the listed station complex - specifically in relation to the surface-level and sub-surface buildings and structures, and the space above the station;
 - Secondly, the heights and massing of the proposals – to which specific reference is made in the Council's grounds of refusal - and their effects on the settings and significance of nearby statutorily listed properties and on nearby unlisted buildings identified as making a positive contribution to the historic and architectural character and appearance of the conservation area*; and
 - Thirdly, the heights and massing of the proposals – to which specific reference is made in the Council's grounds of refusal - and their effects on the character, appearance and significance of the Thurloe Estate and Smith's Charity Conservation Area.

* As identified in Figure 2.8 – Buildings Audit in the Council’s *Thurloe Estate and Smith’s Charity Conservation Area Appraisal* of October, 2016.

1.5 My evidence is intended to complement the evidence on conservation-related issues being presented to the Inquiry by Robert Ward-Booth on behalf of the Residents’ Associations, and will refer in part to the assessments contained in that evidence. My evidence will also refer to the Council’s *Thurloe Estate and Smith’s Charity Conservation Area Appraisal* of October, 2016.

1.6 Through my evidence, I seek to demonstrate that:

- The heights and massing of the appeal proposals will fail to preserve the special architectural or historic interest and setting of the listed station contrary to the provisions of Sections 16 (2) and 66 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and Policies CL1, CL2 and CL4 of the *Royal Borough of Kensington and Chelsea Local Plan* of September, 2019, and will cause substantial harm to the particular significance of the station as a designated heritage asset contrary to the provisions of paragraphs 199 and 200 of the *National Planning Policy Framework* and Policies CL1, CL2, CL4 and CL9 of the *Local Plan* and Policy HCI of *The London Plan* of March, 2016.
- The heights and massing of the proposed buildings will fail to either preserve or enhance the character or appearance of the Thurloe Estate and Smith’s Charity Conservation Area contrary to the provisions of Section 72 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and Policies CL1, CL2, CL3, and CL9 of the *Local Plan*, and will cause substantial harm to the particular significance of the Thurloe Estate and Smith’s Charity Conservation Area as a designated heritage asset contrary to the provisions of paragraphs 199, 200 and 201 of the *National Planning Policy Framework*, Policies CL1, CL2, CL3 and CL9 of the *Local Plan* and Policies D3.D(1) and (11) and HCI.C of *The London Plan*.
- The heights and massing of the proposed buildings will fail to preserve the immediate settings of the grade II and grade II* listed houses at the northern end of Pelham Place adjacent to or close to the junction with Pelham Street; the listed properties at the south-western corner of Thurloe Square; and the listed terrace at nos.15 to 18 (consec), Cromwell Place, contrary to the provisions of Section 66 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and will cause harm to their significance as designated heritage assets contrary to the provisions of paragraphs 199, 200 and 201 of the *National Planning Policy Framework* and Policies D.3.D(1) and (11) and HCI.C of *The London Plan*. And
- The heights and massing of the proposed buildings will cause harm to the particular significance of the unlisted terraces of houses on the southern side of Pelham Street; on the unlisted no. 49, Pelham Street and no. 5, Thurloe Square; on the unlisted terrace of houses, apartments and shops at nos. 25 to 45 (odd), Thurloe Street; and on the unlisted blocks of shops and apartments at nos. 23 to 25 (consec.) Cromwell Place and at nos. 20 to 34 (even), Thurloe Street, as non-designated heritage assets – as identified by the Council as making a positive contribution to the historic and architectural character of the conservation area - contrary to the provisions of

paragraph 203 of the *National Planning Policy Framework* and Policies D.3.D(1) and (11) and HCl.C of *The London Plan*.

1.12 Through my evidence, I demonstrate that:

- The heights and massing of the proposed buildings will also be in conflict with the relevant guidance contained in in the *National Design Guide* of January, 2021; the Council's *Building Heights in the Royal Borough Supplementary Planning Document* of July, 2021; and key aspects of the development envisaged in TfL and Deloitte Real Estate's *South Kensington Station – Around Station Development - Development Brief* of December, 2016.

2. THE PARTICULAR SPECIAL INTEREST AND SETTING OF THE STATION, ITS SIGNIFICANCE, AND ITS CONTRIBUTION AND THAT OF OTHER BUILDINGS TO THE CHARACTER, APPEARANCE AND SIGNIFICANCE OF THE THURLOE ESTATE AND SMITH'S CHARITY CONSERVATION AREA

2.1 The existing South Kensington Station complex and the adjacent streets and spaces occupies a highly significant location within the Thurloe Estate and Smith's Charity Conservation Area and plays a major role in shaping its character, appearance and significance. Not only does the site serve the needs of the adjacent residential areas and local businesses, but importantly, it serves the needs of the nationally significant cultural and educational quarter to the north. The future conservation and development of the station complex are clearly of particular importance to the effective functioning of this part of the capital and to effective public transport links to other parts of the capital.

2.2 The listed status of the station complex and its significant location within the conservation area mean that proposals for development in and around the complex need to be shaped with regard to the particular special architectural and historic interest and significance of the complex and its setting and the particular character, appearance and significance of the conservation area. In this, the heights and massing of proposals for development and the way in which they may affect the particular special architectural and historic interest and significance of the complex and its setting and the particular character, appearance and significance of the conservation area are of the greatest relevance – not least, given the ways in which they may serve to preserve the special interest and setting of the listed complex and sustain its significance, and to preserve or enhance the character and appearance of the conservation area and sustain its significance.

THE SPECIAL INTEREST AND SIGNIFICANCE OF THE LISTED STATION COMPLEX

2.3 The history and development of South Kensington Station is complex. I set this out in detail in Appendix B – The History and development of the station to the present.

2.4 The entire South Kensington Station complex was added to the *National Heritage List for England* in August, 2004. I attach a copy of the listing-entry and the accompanying text in Appendix C.

2.5 Quite rightly, the text accompanying the formal listing-entry under the heading of 'Assessment of importance', states that:

'The special interest of South Kensington Station' resides in the survival of the arcaded 1867-68 revetments, which belong to the first generation of underground architecture anywhere on the world. Sherrin's arcade possesses special interest as a fine survivor of Edwardian retail architecture....'

However, the text continues:

'The rest of the station is not regarded as possessing special interest, although the 1907 Leslie Green-designed frontage on Pelham Street clearly makes a positive contribution to the conservation area....'

2.6 I consider that such an under-recognition of the special interest of the remaining parts of the station complex is particularly regrettable, given the considerable architectural and historic interest and significance of the early-20th century, classically-detailed, Portland Stone entrance-facades to the station and arcade fronting Thurloe Street and Pelham Street; Leslie Green's early-20th century, surface-level station building fronting Pelham Street; the surviving, early-20th century platform-canopies at sub-surface level; and the ten, surviving, cast-iron columns and beams along the southern side of the station at sub-surface-level which once carried nine of the sixteen bays of the southern edge of the former, elliptically-arched, glazed roof. In my judgement, not only do these key parts of the station complex contribute to its own significance, but also to the character, appearance and significance of the Thurloe Estate and Smith's Charity Conservation Area.

2.7 Like Robert Ward-Booth, I consider that of considerable significance, too, in relation to both the listed station complex and the conservation area, is the survival of the essentially open character of the sub-surface part of the station and, to a lesser extent, in my view, the open space between the eastern end of the surviving platforms and the bridge (Bridge D 106) carrying the road that links Pelham Street to the south-western corner of Thurloe Square.

2.8 Like Robert Ward-Booth, in my judgement of considerable significance in relation to both the listed station complex and the conservation area, is the essentially 'low profile' of the entire group of buildings comprising the surface-level station buildings and the parade of shops and restaurants extending around the 'bullnose' curve between Thurloe Street and Pelham Street – nos. 36 to 46 (even), Thurloe Street and nos. 1 to 9 (odd), Pelham Street. Importantly, whilst of only modest height, the entrances to the station and the arcade from Thurloe Street and Pelham Street provide a clear and distinctive 'street-presence' given that the adjacent the parade of shops and restaurants extending around the 'bullnose' curve rises no higher.

- 2.9 In my judgement, whilst the loss of the two, elliptically-arched, glazed roofs and the shallow-pitched, glazed roof that once covered the entire, sub-surface station is particularly regrettable, they have long been lost, and the provision of the individual, glazed, timber platform-canopies with decorative, timber valances along the length of the wide, island-platform and the adjacent open areas extending to the boundaries of the station to north and south are of particular value and are in marked contrast to the unfortunate outcome of the decking-over of the entire sub-surface station as at Gloucester Road Station and the existing, decidedly, poorly-lit and unattractive covered areas below the surface-level and intermediate level buildings and structures at the western end of the main platform.

THE SETTING OF THE LISTED STATION COMPLEX IN THE CONSERVATION AREA

- 2.10 The setting of the listed station within the Thurloe Estate and Smith's Charity Conservation Area embraces a number of buildings and spaces of diverse scale and character in the immediate vicinity of the station.
- 2.11 This scale and character is well described in Sections 1, 2, 3 and 4 of the Council's *Thurloe Estate and Smith's Charity Conservation Area Appraisal* of October, 2016, and is also identified in the evidence of Robert Ward-Booth. The paragraphs in the Appraisal covering the early-Victorian houses in Pelham Crescent, Pelham Place and Pelham Street (paragraphs 3.19 and 3.27 to 3.31); the Victorian Italianate properties in Thurloe Square, Thurloe Place and Thurloe Street (paragraphs 3.46 and 3.47 to 3.56) and in Cromwell Road and Cromwell Place (paragraphs 3.82 to 3.87), are particularly relevant.
- 2.12 Also highly relevant are the specific paragraphs describing the shops in Cromwell Place, Exhibition Road, Old Brompton Road, the South Kensington Station, Thurloe Place and Thurloe Street (paragraphs 3.187; 3.192 to 3.197; 3.198; 3.199 and 3.200; 3.201 to 3.206; and 3.207 and 3.208); the specific paragraphs describing artists' studios and Thurloe Studios at no. 5, Thurloe Square in particular (paragraphs 3.223 and 3.224); and most importantly, the paragraph describing South Kensington Station itself (paragraph 3.257).
- 2.13 Of particular relevance in relation to the Appeal proposals are the paragraphs relating to views within the conservation area – paragraphs 4.13 to 4.19. Importantly, significant views around the station are identified in Figure 4.1 – Views.
- 2.14 All these paragraphs are highly relevant in securing a full understanding and appreciation of the character and appearance of the conservation area and informing any proper consideration of proposals for development and other change within the area.
- 2.15 Whilst there are buildings of substantial height and massing within the immediate vicinity of the station, such as the eight/nine-storey inter-War shops and flats at nos. 1 to 41 (odd), Old Brompton Road (Melton Court) to the south, the eight-storey inter-War flats at the corner of Pelham Street and Onslow Square (Malvern Court) to the south and south-east; the six-storey, 19th century, stucco-faced, block of shops and

flats at nos. 2 to 12 (even), Old Brompton Road at the junction with Harrington Road (Egerton Court) to the south-west all these buildings fall outside the boundary of the Thurloe Estate and Smith's Charity Conservation Area. Rather, it is the buildings within the immediate vicinity of the station that fall within the conservation area that not only contribute to the character and appearance of the conservation area – as identified in the Council's *Thurloe Estate and Smith's Charity Conservation Area Appraisal* - but also shape and inform the setting of the listed station.

- 2.16 Many such buildings within the immediate vicinity of the listed station that also fall within the conservation area, particularly those of early-to-mid-19th century origin, are of relatively modest height and massing, such as the houses in the listed terraces comprising nos. 1 to 13 (odd) and nos. 2 to 18 (even), Thurloe Street – the rear gardens of the latter extending south-eastwards to the northern boundary of the station; the houses in the terraces comprising nos. 6 to 10 (even) and 20 to 24 (even), Pelham Street; the listed pair of houses at 16-18, Pelham Place; and the houses in the grade II* listed terraces comprising nos. 1 to 29 (odd) and nos. 2 to 14 (even), Pelham Place. I consider that it is buildings such as these which contribute most positively to the particular character, appearance and significance of the conservation area and also shape and inform the setting of the listed station. See photographs of the properties today attached in Appendix F.
- 2.17 I also consider that other and generally larger, early-to-mid-19th century and mid-to-late-19th buildings within the immediate vicinity of the listed station which also fall within the conservation area such as the listed nos. 6 to 12 (consec.), nos. 45 to 51 (consec.), no. 52, Thurloe Square, and nos. 15 to 18 (consec.), Cromwell Place; the unlisted no. 5, Thurloe Square and no. 49, Pelham Street; the unlisted terrace of houses, apartments and shops at nos. 25 to 45 (odd), Thurloe Street and the unlisted blocks of shops and apartments at nos. 23 to 25 (consec.) Cromwell Place and at nos. 20 to 34 (even), Thurloe Street, contribute positively to the particular character, appearance and significance of the conservation area and also shape and inform the setting of the listed station.
- 2.18 All these buildings are highly relevant in shaping the immediate context of the Appeal site and their respective scales and character taken into account in the consideration of the proposals and their potential impact.
- 2.19 Importantly, I note that the listed houses in the terrace comprising nos. 2 to 18 (even), Thurloe Street, developed before the construction of the station, are separated from the top of the original, northern revetment of the sub-surface station by gardens of varying length – many containing mature trees. In contrast, I note that the rear walls of the unlisted block of shops and apartments comprising nos. 20 to 34 (even), Thurloe Street rest upon or extend very closely to the top of the northern revetment of the sub-surface station and the flank of the later, surface-level station building. However, I note that even here, there is a series of narrow recesses between the pairs of projecting wings of varying depth.
- 2.20 Of the buildings to the north of the station complex which contribute positively to the setting of the listed station complex and to the character, appearance and significance of the conservation area, I note the particular relevance of the two, listed terraces of

early-to-mid-19th century, stucco-faced, classically detailed houses fronting Thurloe Street - nos. 1 to 13 (odd) and nos. 2 to 18 (even) - each comprising three storeys and basement – those on the northern side with traditionally proportioned mansard roofs and those on the southern side without mansard roofs on the southern side. Through their scale and character, these listed properties play an essential role in shaping the setting of the Appeal site and the adjacent part of the conservation area.

- 2.21 Of the buildings to the north of the station complex which contribute positively to the setting of the listed station complex and to the character, appearance and significance of the conservation area, I also note the relevance of the unlisted, mid-to-late-19th century terrace of brick-faced houses and apartments at nos. 25 to 39 (odd), Thurloe Street comprising four-storeys and basement - some with mansard roofs - and the western end of the same terrace comprising stucco-faced shops and apartments at nos. 41 to 45 (odd), Thurloe Street, on the northern side of the street, and the unlisted part-brick – part-stucco-faced, four-storey block of shops and apartments at nos. 20 to 34 (even), Thurloe Street on the southern side – the absence of an attic-storey, unlike the terraces on the opposite side of the street, emphasizing the sheer height of the block – particularly in relation to the earlier, listed terrace at nos. 2 to 18 (even), Thurloe Street. See the photograph of the gap between the two in Appendix F. Like the listed properties nearby, these buildings, through their scale and character, play a positive part in shaping the setting of the Appeal site and the adjacent part of the conservation area.
- 2.22 Of the buildings to the south of the station complex which contribute positively to the setting of the listed station complex and to the character, appearance and significance of the conservation area, I note the particular relevance of the two terraces of early-to-mid-19th century, stucco-faced, classically detailed houses of modest height and massing extending along a significant part of the southern side of Pelham Street – nos. 6 to 10 (even) and nos. 20 to 24 (even) – each comprising two storeys and basement with traditionally proportioned mansard roofs – and a single, 20th century house of similar character and scale – no. 4, and, between the two terraces, the terrace of taller, mid-to-late-19th century, red-brick houses – nos. 12 to 18 (even) – each comprising three storeys and basement with traditional mansard roofs. Like the listed properties nearby in Pelham Place, these buildings, through their scale and character, play an essential role in shaping the setting of the Appeal site and the adjacent part of the conservation area.
- 2.23 Of the buildings to the south of the station complex which contribute positively to the setting of the listed station complex and to the character, appearance and significance of the conservation area, I also note the particular relevance of the raised return (flank) elevation of no. 29, Pelham Place, marking the western corner of the junction of Pelham Street and Pelham Place - the northern end-house of the grade II* terrace of stucco-faced, classically detailed properties – nos. 1 to 29 (odd), Pelham Place - each comprising three storeys and basement. I further note the particular relevance of the pair of listed stucco-faced villas – nos. 16 and 18, Pelham Place - located on the opposite, eastern, corner of the junction with Pelham Place - each comprising two storeys and basement with hipped roofs – beyond which extends the grade II* terrace of stucco-faced, classically detailed houses - nos. 2 to 14 (even), Pelham Place – each comprising three storeys and basement. See photographs of the properties today

attached in Appendix F. Through their scale and character, these listed properties play an essential role in shaping the setting of the Appeal site and the adjacent part of the conservation area.

- 2.24 Of particular townscape significance at the western end of the Appeal site is the parade of shops and restaurants extending around the 'bullnose' curve between Thurloe Street and Pelham Street – nos. 36 to 46 (even), Thurloe Street and nos. 1 to 9 (odd), Pelham Street. The modest height of this parade of shops – the same as the two, adjoining Portland Stone entrances to the station and arcade - and its curving form, play an essential role in resolving the complex townscape geometry of this part of South Kensington, where no less than six significant roads meet-up in a series of irregular junctions, allowing the distinctive, 'Flat-iron' western end of no. 34, Thurloe Street, to read clearly - rising above the Thurloe Street station-entrance, and allowing the similarly distinctive, Leslie Green designed surface-level station building serving the deep-level platforms to read clearly – rising above the Pelham Street station-entrance. I would observe that in this connection, the present and long-running absence of buildings along the northern side of Pelham Street - particularly adjacent to Leslie Green's surface-level station building, where the original exit-wing has been lost in recent years, allows this most important building to be read clearly and its architectural and townscape interest and significance to be readily appreciated.
- 2.25 At the eastern end of the Appeal site, I note that whilst the long under-used and unresolved, open area at the corner of Pelham Street and the roadway leading northwards to the south-western corner of Thurloe Square provides opportunities for viewing the sub-surface station from street level, it also facilitates views above the terraces on the southern side of Pelham Street towards the substantial massing and unattractive rear elevations of the eight-storey, inter-War flats at the corner of Pelham Street and Onslow Square (Malvern Court).
- 2.26 Similarly, I consider that the long unresolved, open area at the south-western corner of Thurloe Square seriously detracts from the townscape coherence and sense of enclosure of this part of the square and the southern and western ends of the terraces on the western and southern sides of the square respectively, detracting from the integrity of the square as first built before the demolitions required for the construction of the station in the 1860s.
- 2.27 With the exception of the spaces referred to in paragraphs 2.21 and 2.22 above, all these buildings not only contribute to the setting and significance of the listed station complex and to the character, appearance and significance of the conservation area, but possess varying degrees of significance in their own right as both designated and non-designated heritage assets.
- 2.28 As noted in paragraph 2.18 above, all the buildings referred to above are highly relevant in shaping the immediate context of the Appeal site and their respective scales and character taken into account in the consideration of the proposals and their potential impact.

3. THE IMPACTS OF THE PROPOSED DEVELOPMENT ON THE PARTICULAR SPECIAL INTEREST AND SETTING OF THE STATION, ON ITS SIGNIFICANCE, AND ON THE CHARACTER, APPEARANCE AND SIGNIFICANCE OF THE THURLOE ESTATE AND SMITH'S CHARITY CONSERVATION AREA

- 3.1 The basis for my concerns about the potential effects of the proposed development draws upon a number of factors; firstly, my long familiarity with this part of South Kensington and South Kensington Station as a regular visitor and user of the area since the early-1960s; secondly, on a detailed reconnaissance and study of the area and the station over recent months on both foot and the top-deck of buses; thirdly, on an inspection and assessment of the architects' drawings submitted in support of the applications; and finally on viewing the verified images submitted in support of the applications and those prepared on behalf of the objectors. I have also read carefully the relevant reports submitted in support of the applications and have read and had full regard to the Council's formally adopted *Thurloe Estate and Smith's Charity Conservation Area Appraisal* of October, 2016.
- 3.2 In my judgement, subject to satisfactory height, massing and external design, the redevelopment of the parade of shops and restaurants extending around the 'bullnose' curve between Thurloe Street and Pelham Street – nos. 36 to 46 (even), Thurloe Street and nos. 1 to 9 (odd), Pelham Street - may be acceptable in principle, were the case for retention and refurbishment to be found to be unsustainable. Such an approach was usefully explored in the development envisaged in TfL and Deloitte Real Estate's *South Kensington Station – Around Station Development – Development Brief* of December, 2016 – key aspects of which attracted qualified support from the local community at the time.
- 3.3 Those key aspects were limiting the scale of the proposed development around the 'bullnose' curve between Thurloe Street and Pelham Street to that of the existing building with only a modestly scaled, additional storey at roof-level, set back from the edge of the base-storey; limiting development along the northern side of Pelham Street to only three storeys except at the eastern end where it would rise to four storeys; introducing a single-storey element between the eastern flank of Leslie Green's surface-level station building fronting Pelham Street and the western flank of the proposed, new three-storey building fronting Pelham Street; retaining and refurbishing nos. 20 to 34 (even), Thurloe Street, rather than demolishing and reconstructing the building behind a retained façade; and avoiding built development above the tracks at the eastern end of the Appeal site.
- 3.6 Regrettably, the Appeal proposals set aside such principles:
- By proposing development around the 'bullnose' curve between Thurloe Street and Pelham Street rising up sheer to four 'commercial' storeys (plus plant-enclosure) in overall height;
 - By proposing development along the northern side of Pelham Street rising up to four and five storeys (plus plant-enclosures) along the greater part of the street;
 - By demolishing and reconstructing 20 to 34 (even), Thurloe Street behind a retained façade; and

- By extending built development rising to five storeys (plus plant-enclosure) above the tracks at the eastern end of the site.
- 3.7 In reaching judgements on the heights and massing of the proposed buildings and their potential impacts on the existing buildings around the Appeal site and on the conservation area, I have relied substantially on the architects' finally revised, 1:200 scale sections and elevations which usefully show the relationships with the existing buildings around the site, are also annotated with levels. I set out my detailed comments on each of these sections and elevations in paragraphs 3.16 to 3.38 below, and attach copies of enlarged extracts of those drawings in Appendix G, given that the lengths of the original drawings would not fit on to A.4-format sheets unless reduced down to an indecipherable scale.
- 3.8 At the outset, I would stress that my comments relate primarily to the highly significant issues of heights and massing of the proposed buildings. However, this is not to suggest that the detailed elevational design of the buildings is not an important issue. In this connection, I would refer to the evidence of Robert Ward-Booth for comment whilst stressing the relevance of issues such as the choice of facing and roofing materials and the sizes and proportions of fenestration and other openings to reaching the fullest views on the acceptability or unacceptability of development proposals in historic settings.
- 3.9 In relation to the proposed redevelopment of the shops and restaurants around the 'bullnose' curve between Thurloe Street and Pelham Street, the proposed development of a new building following the same curve but rising to four, full storeys in height with a flat, rear elevation, rising three full storeys above the level of the classically-detailed, Portland Stone entrances to Station Arcade and the station from Thurloe Street and Pelham Street, will, by virtue of its proposed height and massing, fail to preserve the particular special interest and setting of the listed, surface-level buildings of the station or sustain their significance; fail to either preserve or enhance character or appearance of the conservation area or sustain its significance; and, indeed, will cause considerable harm to both the significance of the station and the conservation area.
- 3.10 Similarly, I consider that given the significant heights and massing, the proposed development along the northern side of Pelham Street will cause considerable harm to the settings and significance of the three terraces of houses, directly opposite on the southern side of the street; the setting and significance of Leslie Green's, listed, surface-level building serving the deep-level station; and character of the conservation area – failing to either preserve or enhance its character or appearance, or sustain its significance.
- 3.11 In my judgement, the proposed development of buildings of significant height and massing along the northern side of Pelham Street directly above the full length of the southern part of the sub-surface station and extending northwards beyond the line of the surviving cast-iron columns that originally supported the former, glazed roofs above the southern part of the station – leaving what appears to be a deep, unused void - will fail to preserve the particular special interest and setting of the listed sub-surface listed station or sustain its significance; fail to either preserve or enhance

the character or appearance of the conservation area or sustain its significance; and, indeed, will cause considerable harm to the significance of both the station and the conservation area.

- 3.12 In my judgement, whilst subject to satisfactory height, massing and external design, the development of the long under-used and unresolved, open area at the corner of Pelham Street and the roadway leading northwards to the south-western corner of Thurloe Square may be acceptable in principle. However, given its significant height and massing, the proposed development will fail to preserve the settings of the grade II* listed no. 29, Pelham Place on the western corner of the junction of Pelham Street and Pelham Place and the terrace beyond; the listed pair of listed villas at the eastern corner of the junction of Pelham Street and Pelham Place (nos. 16 and 18, Pelham Place) and the grade II* listed terrace beyond. The proposed development will also harm their settings and significance and those of the unlisted of no. 49, Pelham Street on the eastern corner of the junction of Pelham Street and the roadway leading northwards to the south-western corner of Thurloe Square. In addition, the proposed development will fail to either preserve or enhance the character or appearance of the conservation area or sustain its significance, and cause considerable harm to its significance.
- 3.13 Similarly, in my judgement, given its height and massing, the proposed development on the western side of the road and bridge leading from Pelham Street to the south-western corner of Thurloe Square, will fail to preserve the settings of the listed houses at the southern end of the terrace comprising nos. 45 to 51 (consec.) and 52, Thurloe Square and at the western end of the terrace comprising nos. 5 to 12 (consec.) Thurloe Square. The proposed development will also harm their settings and significance and those of the unlisted Thurloe Studios at no. 6, Thurloe Square. In addition, the proposed development will fail to either preserve or enhance the character or appearance of the conservation area or sustain its significance, and cause considerable harm to its significance.
- 3.14 Finally, in addition to the highly contentious proposal to demolish and redevelop the four-storey block of shops and apartments comprising nos. 20 to 34 (even), Thurloe Street behind a retained street facade, I consider that the proposed imposition of an additional storey at roof-level will exacerbate and further emphasize the sheer height of the block – particularly in relation to the earlier, listed terrace at nos. 2 to 18 (even), Thurloe Street immediately adjacent to the east. In my judgement, such a disparity in heights will harm the established townscape character and appearance of this part of the conservation area - failing to either preserve or enhance its character or appearance, or sustain its significance.

THE PROPOSALS AS DEFINED IN THE ARCHITECTS' PLANS, SECTIONS AND ELEVATIONS

- 3.15 Despite the questionable omission of parallel 'as existing' elevations and sections, careful consideration of the architects' 'as proposed' elevations and sections of the proposed 'Around Station Development' – the relevant extracts of which are set out in Appendix G – are of particular significance in identifying and assessing the scale and nature of the proposals and their potential effects on the listed station complex, its

setting and the wider urban context. In my judgement, these sections and elevations demonstrate very clearly the excessive heights and massing of the various parts of the proposed development in relation to their respective settings and their wider context and the failure to preserve the settings of the listed station and other listed buildings in the vicinity, or to either preserve or enhance the character or appearance of the conservation area. They also demonstrate the overall substantial harm that such development will cause to the special interest and significance of the listed station and its setting and to the character, appearance and significance of the conservation area; and the harm caused to other designated and non-designated heritage assets in the vicinity of the station;

References to 'AOD' relate to the levels Above Ordnance Datum annotated on the architects' sections and elevations.

Please see Part 2 of my Proof, Appendix G for the below drawings.

SECTION A-A – Drawing RSHP-A-02000-S-AA, rev. P2

- 3.16 The long, east-west section looking northwards through both the surface-level and sub-surface parts of the station and the proposed new buildings at the western and eastern ends of the site is most useful in demonstrating the very substantial sheer height of both proposed buildings, and the increased height of the reconstructed block at nos. 20 to 34 (even), Thurloe Street in relation to existing buildings in the vicinity, and their potentially harmful effects on the settings and significance of those buildings.
- 3.17 The proposed redevelopment of the existing, single-storey parade of shops and restaurants that extend around the 'bullnose' curve between Thurloe Street and Pelham Street – nos. 36 to 46 (even), Thurloe Street and nos. 1 to 9 (odd), Pelham Street - as a four-storey block rising up sheer to 25.66 m. AOD (with the plant-enclosure rising to 27.52 m. AOD) is clearly excessive when compared with the 13.74 m. AOD level of the roof-parapets of the adjacent entrances to the station and arcade and the existing parade of shops and restaurants.
- 3.18 Importantly, too, the proposed new building rises to a level over two metres higher than the 23.41m. AOD level of the primary cornice of the substantially scaled, listed terrace at nos 15 to 18 (consec.), Cromwell Place directly opposite at the junction with Harrington Road, and to a level above the 24.08 m. AOD level of the roof-parapet of the similarly substantially scaled, mid-to-late-19th century terrace directly opposite on the northern side of Thurloe Street (nos. 25 to 45, Thurloe Street).
- 3.19 In my judgement, such disparities in building heights will result in considerable harm to the settings and significance of both listed and non-listed buildings, and to the character, appearance and significance of the conservation area.
- 3.20 In addition, the proposed increase in height of the already substantially scaled block comprising nos. 20 to 34 (even), Thurloe Street will exacerbate the already existing disparity in heights between nos. 20 to 34 (even) – as proposed for demolition and reconstruction behind a retained street façade - and the roof-tops of the adjacent,

listed terrace at nos. 2 to 18 (even), Thurloe Street to the immediate east, and will result in harm to the setting and significance of the terrace and the character, appearance and significance of the conservation area.

SECTION B-B – Drawing RSHP-A-02001-S-BB, rev. P2

- 3.21 The long, east-west section looking southwards through both the surface-level and sub-surface parts of the station and the proposed new buildings at the eastern and western ends of the site is also useful in demonstrating the very substantial sheer height of both proposed buildings, and the substantial scale and massing of the proposed four-storey, residential block and the proposed five-storey, commercial block along the northern side of Pelham Street, directly above the presently open, southern part of the sub-surface station.
- 3.22 At the eastern end of the site, the height of the proposed five-storey, residential block spanning over the tracks rising to 23.94 m. AOD (with the stair/lift enclosure rising to 26.89 m. AOD, and a modest set back at 20.94 m. AOD) is wholly excessive in relation to the height of the existing, grade II* listed terrace of houses on the western side of Pelham Place shown beyond the junction with Pelham Street, and to the height of no. 49, Pelham Street, on the eastern corner of the junction of Pelham Street and the road extending northwards to the south-western corner of Thurloe Square, resulting in considerable harm to their settings and significance.
- 3.23 At the western end of the site, the proposed redevelopment of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street as a four-storey block rising up sheer to 25.66 m. AOD (with the plant enclosure rising to 27.52 m. AOD) is wholly excessive when compared with the 13.74 m. AOD level of the roof-parapets of the adjacent entrances to the station and arcade and the existing parade of shops and restaurants; with the 16.2 m. AOD level of the roof-parapets of Leslie Green’s UERL surface-level station building fronting Pelham Street.
- 3.24 Importantly, too, the proposed new building rises to a level well above the 23.93 m. AOD level of the primary cornice of the very substantially scaled, unlisted building at the junction of Old Brompton Road and Harrington Road which falls outside the conservation area.
- 3.25 I consider that the disparities in building heights between the proposed new building and the surface-level station buildings will result in substantial harm to the settings and significance of the surface-level station buildings and to the character, appearance and significance of the conservation area.

SECTION C-C – Drawing RSHP-A-02002-S-CC, rev. P2

- 3.26 The north-south cross-section looking eastwards through the sub-surface part of the station and the proposed new, four-storey, residential building fronting Pelham Street is most useful in demonstrating the excessive height of the proposed five-storey residential block spanning over the tracks at the eastern end of the site (rising to 23.94 m. AOD, with the plant-enclosure rising to 26.89 m. AOD, and a modest set back at

20.94 m. AOD) in relation to the height of the grade II* listed terrace of houses on the western side of Pelham Place to the south, and to the height of no. 49, Pelham Street, on the eastern corner of the junction of Pelham Street and the road extending northwards to the south-western corner of Thurloe Square to the east which rises to 20.42 m. AOD.

- 3.27 I consider that the disparity between building heights will result in considerable harm to the settings and significance of the both the listed and the unlisted buildings and to the character, appearance and significance of the conservation area.
- 3.28 The cross-section is also useful in demonstrating the excessive height of the proposed, four-storey, residential building on the northern side of Pelham Street, rising to 19.76/19.34 m. AOD (with a modest set-back at 16.43 m. AOD) in relation to the mid-to-late-19th century, two-storey (with mansard roof-storey and basement) terrace of houses on the southern side of the street.
- 3.29 I consider that the disparity between building heights will result in considerable harm to the settings and significance of the terrace and to the character, appearance and significance of the conservation area.
- 3.30 The cross-section is most useful in demonstrating the proposal to extend the new development along the northern side of Pelham Street northwards, well beyond the line of surviving, original, cast-iron columns that run along the southern side of the sub-surface station – seemingly supported on what appear to be two, new rows of concrete or steel columns, the detailed design of which does not appear to be provided in the documentation supporting the overall applications. Similarly, no proposals appear to be provided in the documentation supporting the overall proposals clarifying the proposed treatment of the cavernous void beneath the proposed new buildings along the northern side of Pelham Street.
- 3.31 In my judgement, the proposal will have a substantially harmful impact on the special interest and significance of the listed station.

SECTION DD - Drawing RSHP-A-02003-S-DD, rev. P2

- 3.32 The north-south cross-section looking westwards through the sub-surface part of the station and the proposed new, five-storey, stair-link fronting Pelham Street is most useful in demonstrating the considerable height of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street at the western end of the site. which rises to 25.66 m. AOD.
- 3.33 Importantly, the section shows the excessive height of the proposed access-link on the northern side of Pelham Street, which rises to 22.86 m. AOD (with the offices beyond rising to 23.12 m. AOD (with a modest set-back at 20.27 m. AOD) and the lift-motor enclosure beyond rising to 26.17 m. AOD) in relation to the modest, domestic scale of the existing, early-to-mid-19th century, two-storey (with mansard roof-storey and basement) terrace of houses on the southern side of the street, resulting in considerable harm to the setting and significance of the terrace.

- 3.34 I consider that the disparity between building heights will result in considerable harm to the setting and significance of the terrace and to the character, appearance and significance of the conservation area.
- 3.35 As with Section CC, the cross-section is also most useful in demonstrating the proposal to extend the new development along the northern side of Pelham Street northwards, well beyond the line of surviving, original, cast-iron columns that run along the southern side of the sub-surface station – seemingly supported on what appear to be two, new rows of concrete or steel columns, the detailed design of which does not appear to be provided in the documentation supporting the overall applications. Similarly, no proposals appear to be provided in the documentation supporting the overall proposals clarifying the proposed treatment of the cavernous void beneath the proposed new buildings along the northern side of Pelham Street.
- 3.36 In my judgement, the proposal will have a substantially harmful impact on the special interest and significance of the listed station.
- 3.37 Finally, the cross-section is also useful in showing the bland, five-storey, end-wall of the rebuilt of nos. 20 to 34 (even), Thurloe Street, directly facing the flank wall of the listed no. 18, Thurloe Street.

SECTION EE – Drawing RSHP-A-02004-S-EE, rev. P2

- 3.38 The north-south cross-section looking eastwards through the sub-surface part of the station and the proposed new, five-storey, commercial building fronting Pelham Street is also useful in demonstrating the considerable height of the proposed four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street at the western end of the site. which rises to 25.66 m. AOD.
- 3.39 The cross-section, read with Section DD, is also most useful in demonstrating the excessive height of the proposed, five-storey, commercial building on the northern side of Pelham Street, which rises to a level of 23.12 m. AOD (with a modest set-back at 20.17 m. AOD and the plant-enclosure rising to 26.17 m. AOD) in relation to the existing, early-to-mid-19th century, two-storey (with mansard roof-storey and basement) terrace of houses on the southern side of the street,
- 3.40 I consider that the disparity between building heights will result in considerable harm to the setting and significance of the terrace, and to the character, appearance and significance of the conservation area.
- 3.41 As with Sections CC and DD, the cross-section is also most useful in demonstrating the proposal to extend the new development along the northern side of Pelham Street northwards, well beyond the line of surviving, original, cast-iron columns that run along the southern side of the sub-surface station – seemingly supported on what appear to be two, new rows of concrete or steel columns, the detailed design of which does not appear to be provided in the documentation supporting the overall applications. Similarly, no proposals appear to be provided in the documentation

supporting the overall proposals clarifying the proposed treatment of the cavernous void beneath the proposed new buildings along the northern side of Pelham Street.

- 3.42 In my judgement, the proposal will have a substantially harmful impact on the special interest and significance of the listed station.

SECTION FF – Drawing RSHP-A-02005-S-FF, rev. P2

- 3.43 The north-south cross-section looking westwards along the length of Station Arcade is also useful in demonstrating the considerable height of the proposed four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street at the western end of the site. which rises to 25.66 m. AOD, not only in relation the 13.74 m. AOD level of the roof-parapets of the adjacent entrances to the station and Station Arcade and the existing parade of shops and restaurants.

- 3.44 It also demonstrates that the proposed new building rises to a level over two metres higher than the 23.41m. AOD level of the primary cornice of the substantially scaled, listed terrace at nos 15 to 18 (consec.), Cromwell Place directly opposite at the junction with Harrington Road, and to a level above the 24.08 AOD level of the roof-parapet of the similarly substantially scaled, mid-to-late-19th century terrace directly opposite on the northern side of Thurloe Street (nos. 25 to 45, Thurloe Street).

- 3.45 It also new building rises to a level well above the 23.93 m. AOD level of the primary cornice of the very substantially scaled, unlisted building at the junction of Old Brompton Road and Harrington Road which falls outside the conservation area.

- 3.46 In my judgement, such disparities in building heights will result in substantial harm to the special interest and significance of the listed station and Station Arcade and to the character, appearance and significance of the conservation area, and considerable harm to the settings and significance of both listed and non-listed buildings within the conservation area.

ELEVATION – NORTH - THURLOE STREET – Drawing RSHP-A-03000-E-N, rev. P2

- 3.47 The east-west elevation along Thurloe Street is useful in demonstrating that the proposed increase in height of the already substantially scaled block comprising nos. 20 to 34 (even), Thurloe Street will exacerbate the already existing disparity in heights between nos. 20 to 34 (even) – as proposed for demolition and reconstruction behind a retained street façade - and the roof-tops of the adjacent, listed terrace at nos. 2 to 18 (even), Thurloe Street to the immediate east, and will result in harm to the setting and significance of the terrace and to the character, appearance and significance of the conservation area.

- 3.48 The elevation also demonstrates that the proposed redevelopment of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street as a four-storey block rising up sheer to 25.66 m. AOD (with the plant-enclosure rising to 27.52 m. AOD) is clearly excessive when compared with the 13.74 m. AOD level of the roof-parapet of the adjacent

Thurloe Street entrance to the station and Station Arcade, reducing its presence in the street - substantially harming its setting and significance.

- 3.49 In addition, the elevation also demonstrates that the proposed new building rises to a level well above the 23.93 m. AOD level of the primary cornice of the very substantially scaled, unlisted building at the junction of Old Brompton Road and Harrington Road which falls outside the conservation area.

ELEVATION – SOUTH – PELHAM STREET – Drawing RSHP-A-03010-E-S, rev. P2

- 3.50 The west-east elevation along Pelham Street is not only useful in demonstrating the excessive height of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street in relation to the height of George Sherrin’s listed entrance to Station Arcade and the station from Pelham Street and the 16.2 m. AOD height of Leslie Green’s listed UERL surface-level station building, reducing their presence in the street. It also shows that proposed new building rises well above the primary cornice which runs at a level of 23.93 m. AOD of the substantially scaled, unlisted building at the junction of Old Brompton Road and Harrington Road to the west which falls outside the conservation area.

- 3.51 In my judgement, such disparities in building heights will result in substantial harm to the special interest and significance of the listed station and Station Arcade and to the character, appearance and significance of the conservation area.

- 3.52 The west-east elevation also demonstrates the excessive 23.94 m. AOD height of the proposed residential building on the western corner of the junction of Pelham Street with the road leading northwards to the south-western corner of Thurloe Street (with the stair/lift rising to in relation to the 20.42 m. AOD height of the unlisted building at no. 49, Pelham Street), and its considerably harmful effect on the setting and significance of the property, on the settings and significance of the grade II and grade II* listed terraces building in Pelham Street to the south, and on the character, appearance and significance on the character, appearance and significance of the conservation area.

ELEVATION – EAST – THURLOE SQUARE – Drawing RSHP-A-03020-E-E, rev. P2

- 3.53 The south-north elevation showing the east-facing elevation of the grade II* listed houses on the western side of Pelham Place, the proposed new residential building spanning the tracks to the east of the sub-surface station rising to 23.94 m. AOD (and the plant-room rising to 26.89 m. AOD), and the listed houses on the western side of Thurloe Square at its southern end usefully demonstrates the excessive height of the proposed new, residential building in relation to the much lower grade II* listed terrace on the western side of Pelham Street to the south, and the very much lower, parapet height of the listed no. 52, Thurloe Square, and the principal cornice height of the listed terrace to the immediate north, harming their significance and setting.

ELEVATION – WEST – CROMWELL PLACE – Drawing RSHP-A-03030-E-W, rev. P2

- 3.54 The north-south elevation along Cromwell Place to the south usefully shows the excessive height of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street in relation to the 24.08 m. AOD parapet height of nos. 41 to 45 (odd), Thurloe Street to the north; the 23.49 m. AOD parapet height of the block at nos. 20 to 34 (even), Thurloe Street to the east, as proposed for reconstruction; and the 13.74 m. AOD height of the listed entrance to Station Arcade and the station from Pelham Street to the south-east.
- 3.55 In my judgement, the proposed new development will substantially harm the setting and significance of the listed station and the character, appearance and significance of the conservation area, and considerably harm the settings and significance of nearby unlisted buildings.
- 3.56 As noted in paragraph 3.15 above, I consider that the ‘as proposed’ elevations and sections are of particular significance in identifying and assessing the scale and nature of the proposals and their potential effects on the listed station complex, its setting and the wider urban context. In my judgement, they demonstrate very clearly the excessive heights and massing of the various parts of the proposed development in relation to their respective settings and their wider context; their failure to preserve the settings of the listed station and other listed buildings in the vicinity, or to either preserve or enhance the character or appearance of the conservation area; and the overall substantial harm that such development will cause to the special interest and significance of the listed station and its setting and to the character, appearance and significance of the conservation area.

THE APPLICANTS’ VERIFIED VIEWS AS INCLUDED IN THE COMMITTEE REPORT

Please see Part 2 of my Proof, Appendix H for the below images.

- 3.57 My significant concerns about the excessive heights and massing of the proposed new development above and around the listed station and their potentially harmful effects on the special architectural and historic interest and significance of the listed station complex and its setting; on the settings and significance of nearby listed and other buildings; and on the character, appearance and significance of the conservation area, have been reinforced by reference to the ‘as existing’ and ‘as proposed’ verified views (using a 24 mm. FL lens) of the proposed developments in their settings submitted by the applicants in Tavernor Consultancy’s *South Kensington Around Station – Addendum to the Townscape, Built Heritage and Visual Assessment* of August, 2021 in support of their proposals – a number which were included in the officer’s report to the Planning Committee - as reproduced in Appendix H.
- 3.58 The view north-eastwards from the south-eastern side of Old Brompton Road – **View 05** - demonstrates very clearly the highly intrusive and harmful effect of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street on the immediate setting and significance of George Sherrin’s listed entrance to Station Arcade and the station from Pelham Street, and the similarly intrusive and potentially harmful effect of the five-storey, commercial block fronting

Pelham Street on the immediate setting and significance of Leslie Green's listed UERL surface-level station building. The view also demonstrates the near total loss from view of the upper storeys of the terrace at nos. 25 to 39 (odd), Thurloe Street from this particular position.

- 3.59 The view north-westwards from the corner of Pelham Street and Pelham Place towards the proposed five-storey residential development at the western corner of the junction of Pelham Street and the road leading northwards to the south-western corner of Thurloe Square – **View 12** - demonstrates very clearly the excessive height and harmful impact of the proposed development in relation that of the grade II* listed no. 20, Pelham Place (even with its added attic storey) and the failure to recover the scale of the terrace of early-to-mid-19th century houses on the western side of that part of Pelham Place which extended to the north of Pelham Street before its demolition resulting from the development of the southern part of the sub-surface station and the tracks to the east.
- 3.60 The view westwards along Harrington Road – **View 02** - usefully demonstrates the unduly dominant and potentially harmful effect of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the 'bullnose' curve between Thurloe Street and Pelham Street in views from the west, giving substantial visual emphasis to the proposed commercial use of the site and massively understating its major public transport role.
- 3.61 The view northwards from the south-western side of the road from Onslow Square - **View 09** - usefully demonstrates the unduly dominant and potentially harmful impact of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the 'bullnose' curve between Thurloe Street and Pelham Street on the immediate setting and significance of George Sherrin's listed entrance to Station Arcade and the station from Pelham Street, and the similarly unduly dominant and harmful impact of the proposed, five-storey, commercial block fronting Pelham Street on the immediate setting and significance of Leslie Green's listed UERL surface-level station building, and the substantial reduction in their presence in the street-scene.
- 3.62 The view looking north-westwards from the north-eastern side of the road from Onslow Square – **View 08** – helpfully shows the unduly dominant and potentially harmful impact of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the 'bullnose' curve between Thurloe Street and Pelham Street on the immediate settings and significance of both George Sherrin's listed entrance to Station Arcade and the station from Pelham Street and Leslie Green's listed UERL surface-level station building, and the substantial reduction in their presence in the street-scene. The view also demonstrate the substantial loss from view of the listed terraces at nos, 15 to 18 (consec.) and nos. 9 to 14 (consec.), Cromwell Place and total loss from view of the central towers of the grade I listed Natural History Museum from this particular position – contrary to the protection of this view under LV8 of the Council's *Building Height in the Royal Borough – A Supplementary Planning Document*.

- 3.63 The view looking southwards from the south-western corner of Thurloe Square – **View 15** – usefully demonstrates the excessive height and potentially harmful impact of the proposed residential development at the corner of Pelham Street and the road leading to the south-western corner of the square on the immediate setting and significance of the listed no. 52, Thurloe Square to the north, and the grade II* listed terrace of houses on the south-western side of Pelham Place to the south.
- 3.64 The view looking eastwards along Thurloe Street from the southern end of Cromwell Place – **View 20** – usefully demonstrates the unduly dominant and potentially harmful impact of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street on the immediate setting and significance of George Sherrin’s listed entrance to Station Arcade and the station from Thurloe Street immediately to the east; on the setting and significance of nos. 20 to 34 (even), further to the east and on the western end of the terrace comprising nos. 25 to 45 (odd), Thurloe Street.

THE OBJECTORS’ VERIFIED VIEWS

- 3.65 The five ‘before’ and ‘after’, Level 3, A3 landscape format, verified views (using a 50 mm. FL lens for Views A to D and a 24 mm. FL lens for Views E) commissioned by objectors – based on the proposals as originally submitted - are also set out in Appendix H. These were prepared by Rendered Image Ltd in November, 2021 on behalf of the Brompton Association, the Onslow Neighbourhood Association and the Pelham Residents Association. My comments take account of the subsequent adjustments made to the original proposals.
- 3.66 The ‘before’ and ‘after’ views looking north-westwards from the north-eastern side of the road from Onslow Square - **Views A** - usefully demonstrate the unduly dominant and potentially harmful impact of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street on the immediate settings and significance of both George Sherrin’s listed entrance to Station Arcade and the station from Pelham Street and Leslie Green’s listed UERL surface-level station building, and the substantial reduction in their presence in the street-scene. The views also demonstrate the substantial loss from view of the listed terraces at nos, 15 to 18 (consec.) and nos. 9 to 14 (consec.), Cromwell Place and total loss from view of the central towers of the grade I listed Natural History Museum from this particular position – contrary to the protection of this view under LV8 of the Council’s *Building Height in the Royal Borough – A Supplementary Planning Document*.
- 3.67 The ‘before’ and ‘after’ views looking eastwards along Harrington Road - **Views B** - helpfully show the unduly dominant and harmful effect of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the ‘bullnose’ curve between Thurloe Street and Pelham Street in views from the west, giving substantial visual emphasis to the proposed commercial use of the site and massively understating its major public transport role.

- 3.68 The 'before' and 'after' views westwards along Pelham Street - **Views C** - usefully demonstrate the considerable height and bulk of the proposed five-storey commercial and four-storey residential development along the northern side of the street. However, comparison with the lesser heights and bulk of the early-to-mid-19th century and mid-to-late-19th century terraces of houses on the southern side of the street is precluded as they are not shown in the views. The views also demonstrate the complete loss from view of the listed terrace at nos. 15 to 18 (consec.), Cromwell Place from this particular position.
- 3.69 The 'before' and 'after' views north-eastwards along Old Brompton Road - **Views D** - demonstrate very clearly the highly intrusive and harmful effect of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the 'bullnose' curve between Thurloe Street and Pelham Street on the immediate setting and significance of George Sherrin's listed entrance to Station Arcade and the station from Pelham Street. The views also demonstrate the near total loss from view of the upper storeys of the terrace at nos. 25 to 39 (odd), Thurloe Street from this particular position.
- 3.70 The 'before' and 'after' views south-westwards from the northern side of Thurloe Street almost directly opposite the entrance to Station Arcade and the station - **Views E** - usefully demonstrate the very substantial harmful impact of the proposed, four-storey replacement development of the existing, single-storey parade of shops and restaurants that extend around the 'bullnose' curve between Thurloe Street and Pelham Street on the immediate setting and significance of George Sherrin's listed entrance to Station Arcade and the station from Thurloe Street. (Views E have been taken with a 24 mm. FL lens in order to capture the setting and so under-represents the full potential impact of the proposed new building as would be seen by the viewer).

4. CONCLUSION

THE EFFECTS OF THE PROPOSED DEVELOPMENT

- 4.1 The failure of the proposed development to secure effective integration of new and old development in this sensitive site within the Thurloe Estate and Smith's Charity Conservation Area is reflected in:
- The significant disparity between the height and massing of the proposed building extending around the 'bullnose' curve between Thurloe Street and Pelham Street and the height and massing of the existing, adjacent, listed station buildings and other nearby buildings of recognized value;
 - The significant disparity between the height and massing of the proposed buildings along the northern side of Pelham Street and the height and massing of the existing houses of recognized value along the southern side of the street, directly opposite;
 - The significant disparity between the height and massing of the proposed building at the corner of Pelham Street and the road leading to the south-western corner of

Thurloe Square and the height and massing of the listed houses in Pelham Place, directly opposite and the height and bulk of the building of recognized value on the opposite corner; and

- The significant disparity between the height and massing of the proposed building and the height and massing of the listed houses at the south-western corner of Thurloe Square.
- 4.2 In my judgement, these deficiencies will fail to ensure the effective preservation or enhancement of the conservation area but will also substantially harm its significance as a designated heritage asset.
- 4.3 In addition and importantly, the proposed extension of new development along the northern side of Pelham Street northwards, well beyond the line of surviving, original, cast-iron columns that run along the southern side of the sub-surface station – seemingly supported on what appear to be two, new rows of concrete or steel columns, the detailed design of which does not appear to be provided in the documentation supporting the overall applications, raises serious issues for the sub-surface part of the station and for travellers, in particular, those waiting on the island platform for westbound trains.
- 4.4 Extraordinarily, no definitive proposals appear to be provided in the documentation supporting the overall proposals clarifying the proposed treatment of the cavernous void beneath the proposed new buildings along the northern side of Pelham Street. The proposal will clearly have a substantially harmful impact on the special interest and significance of the sub-surface part of the station, reducing its distinctive ‘open’ character.
- 4.5 In my judgement, mindful of the relevant guidance contained in paragraph 18 of *National Planning Practice Guidance*, the level of harm to both the character, appearance and significance of the conservation area and the special architectural and historic interest and significance of the listed station complex would be of a substantial order should the proposed development be carried out.
- 4.6 From a careful assessment of the proposals for development directly affecting the listed station complex, including the parade of shops and restaurants extending around the ‘bullnose’ curve between Thurloe Street and Pelham Street – nos. 36 to 46 (even), Thurloe Street and nos. 1 to 9 (odd), Pelham Street, I consider that the heights and massing of the proposed buildings will fail to preserve the special architectural or historic interest and setting of the listed station contrary to the provisions of Sections 16 (2) and 66 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and Policies CL1, CL2 and CL4 of the *Royal Borough of Kensington and Chelsea Local Plan* of September, 2019 and will have a substantially harmful impact on the particular significance of the station as a designated heritage asset contrary to the provisions of paragraphs 199 and 200 of the *National Planning Policy Framework* and Policies CL1, CL2, CL4 and CL9 of the *Local Plan* and Policy HCI of *The London Plan* of March, 2016.

- 4.7 I also consider that the heights and massing of the proposed buildings will fail to either preserve or enhance the character or appearance of the Thurloe Estate and Smith's Charity Conservation Area contrary to the provisions of Section 66 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and Policies CL1, CL2, CL3, and CL9 of the *Local Plan*, and will have a substantially harmful impact on the particular significance of the Thurloe Estate and Smith's Charity Conservation Area as a designated heritage asset contrary to the provisions of paragraphs 199, 200 and 201 of the *National Planning Policy Framework*, Policies CL1, CL2, CL3 and CL9 of the *Local Plan* and Policies D3.D(1) and (11) and HC1.C of *The London Plan*.
- 4.8 I further consider that the heights and massing of the proposed buildings will fail to preserve the immediate settings of the grade II and grade II* listed houses at the northern end of Pelham Place adjacent to or close to the junction with Pelham Street; the listed properties at the south-western corner of Thurloe Square; and the listed terrace at nos.15 to 18 (consec), Cromwell Place, contrary to the provisions of Section 66 (1) of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and will have a harmful impact on their significance as designated heritage assets contrary to the provisions of paragraphs 199, 200 and 201 of the *National Planning Policy Framework* and Policies D.3.D(1) and (11) and HC1.C of *The London Plan*.
- 4.9 Finally, I consider that the heights and massing of the proposed buildings will have a harmful impact on the particular significance of the unlisted terraces of houses on the southern side of Pelham Street; on the unlisted no. 49, Pelham Street and no. 5, Thurloe Square; on the unlisted terrace of houses, apartments and shops at nos. 25 to 45 (odd), Thurloe Street; and on the unlisted blocks of shops and apartments at nos. 23 to 25 (consec.) Cromwell Place and at nos. 20 to 34 (even), Thurloe Street, as non-designated heritage assets contrary to the provisions of paragraph 203 of the *National Planning Policy Framework* and Policies D.3.D(1) and (11) and HC1.C of *The London Plan*.
- 4.10 In addition, in my assessment of the proposals, I have had regard to the relevant provisions of the *National Design Guide* of January, 2021, in particular, three of the ten 'characteristics' – namely Context, Identity and Built Form. Under 'Context', I have assessed the proposals against the need for development to 'understand and relate well to the site, its local and wider context' and to 'value heritage, local history and culture'. Under 'Identity', I have assessed the proposals against the need to 'respond to existing local character and identity; to provide 'well-designed, high quality and attractive places and buildings'; and to 'create character and identity'. And under 'Built form', I have assessed the proposals against the need for 'appropriate building forms'. In my judgement, the heights and massing of the proposals are inconsistent with these principles.
- 4.11 In his evidence, Robert Ward-Booth refers in detail to the character, appearance and significance of both the relevant part of the *Thurloe Estate and Smith's Charity Conservation Area* and to the special architectural and historic interest and significance of the listed and other historic buildings of recognized value within the area, and the potential effects of the proposals on the conservation area and such heritage assets.

- 4.12 For my part, I have focused on the heights and massing, of the existing listed station complex and other historic buildings of recognized value in the vicinity of the station; the heights and massing of the proposed buildings; the relationship between the two; and the potential effects of the proposals on the special architectural and historic interest and significance of the listed station complex and its setting; on the settings and significance of nearby listed and other historic buildings of value; and on the character, appearance and significance of the conservation area.

Paul Velluet

21st December, 2022.

APPENDIX A PAUL VELLUET - QUALIFICATIONS AND EXPERIENCE

Academic and professional qualifications

- Awarded B.A. Hons and B. Arch. Hons degrees by the University of Newcastle-upon-Tyne, 1970 and 1973;
- Awarded a Master of Letters degree by the University of Newcastle-upon-Tyne for a thesis on the life and work of the distinguished cathedral and church architect Stephen Dykes Bower, Surveyor Emeritus of Westminster Abbey, 1981;
- A registered architect under the Architects' Registration Council (formerly the Architects' Registration Council of the United Kingdom) since 1974; an elected Corporate Member of the Royal Institute of British Architects since 1975;
- An elected full member of the Institute of Historic Building Conservation since 1998; and
- A member of both the Franco-British Union of Architects and the Worshipful Company of Chartered Architects;

Professional experience

- Over forty years working in both private practice and the public sector specialising in building conservation and development in historic areas:

Project architect with architects Manning Clamp + Partners, Richmond, Surrey, 1972-1976; Principal Urban and Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation (formerly Department Architecture and Planning), 1976-1991; Regional Architect and Assistant Regional Director, English Heritage London Region, 1991-2004; Senior Associate, Conservation and Planning, with the major Central London commercial practice HOK Architects, 2005-2011; and full-time independent consultancy, 2012 to the present. In addition to private and commercial clients, recent and current clients include:

Imperial College; Bath City Council; The City of London Corporation; the Royal Borough of Kensington and Chelsea Council; Westminster City Council; the Honourable Society of Gray's Inn; the Bedford Estate; the Grosvenor Estate; the Covent Garden Area Trust; the Hampstead Garden Suburb Trust; the Seven Dials Trust; the Environment Trust for Richmond-upon-Thames; the Brompton Association; and the Knightsbridge Association.

- Consultant architect for major re-ordering schemes at Holy Trinity Church, Eltham and St Peter's Church, Petersfield, and major works of conservation at St Paul's Church, Wimbledon Park, London, S.W.19; and
- Formerly Inspecting Architect for St Matthias' Church, Richmond, Surrey; Holy Trinity Church, Eltham, London, S.E.9.; St Peter's Church, Petersfield, Hampshire; and St Paul's Church, Wimbledon Park, London, S.W.19.

Awards and exhibitions

- Project architect (with Manning Clamp + Partners) for the repair and restoration of no. 4, The Terrace, Richmond, Surrey - a scheme awarded *European Architectural Heritage Year (Civic Trust) Award* in 1975;
- Project architect (with Manning Clamp + Partners) for the planning and design stages for the repair of Decimus Burton's Temperate House in the Royal Botanic Gardens, Kew, Surrey - a scheme awarded a *R.I.B.A. Awards commendation* in 1983;
- Architect for projects in Richmond that have received awards and commendations under local awards schemes; and
- Exhibitor in the Architecture Room of the Royal Academy of Arts Annual Summer Exhibitions, 1975 and 1981.

Other professional engagement

Current roles include membership of:

- The Trustee Board of the Covent Garden Area Trust;
- The Trustee Board of the Garrick's Temple Trust (Acting-Chair from 2021);
- The Archdiocese of Westminster Historic Churches Committee;
- The Guildford Cathedral Fabric Advisory Committee (Chair from 2019); and
- The Guildford Cathedral Development Advisory Board.

Past roles include membership of:

- The RIBA's National Awards and Planning Groups;
- The Thames Landscape Strategy Panel of the Royal Fine Art Commission;
- The Cathedrals Fabric Commission for England;
- The Cathedrals Fabric Commission's Technical Group;
- The Board of the Museum of Richmond; and
- Service as an assessor for the RIBA/Crown Estate's Annual Conservation Awards.

Academic engagement

- Former member of the Executive Committee of the Society of Architectural Historians of Great Britain;
- Current and past lecturing commitments and presentation of conference papers on listed building, conservation and access law and practice, conservation and development in Central London, church and liturgical planning, and local history, to universities and other institutions including:

The University of Cambridge; the University of Newcastle-upon-Tyne, The University of Northumbria, the University of Oxford's Department of Continuing Education; the University of Portsmouth; The Institute of Advanced Architectural Studies in the University of York; the Association for Studies in the Conservation of Historic Buildings; the Society for the Protection of Ancient Buildings; the Ancient Monuments Society; the Royal Institution of Chartered Surveyors; the First International Institute American Institute of Architects; the British Property Association; the Diocese of London, the Diocese of Southwark; the Diocese of Truro; the Disability Rights Commission; The Centre for Accessible Environments; Disability North; The Covent

Garden Area Trust; The London Society; Cambridge City Council; the Corporation of the City of London; Greenwich Borough Council; the Cross River Partnership; Urban Design London; and New London Architecture.

Contributor to various publications, journals and guidance including:

- *The Buildings of England, London 2: South* (Penguin Books, 1983); *Context: New buildings in historic settings* (The Architectural Press, 1998); *The Buildings of London, London 6: Westminster* (Yale University Press, 2003); *The RIBA National Award Winners, 2018* (RIBA Architecture and Artifice, 2018); and *100 Churches - 100 Years* (The Twentieth Century Society – Batsford, 2019).
- *The Architects' Journal*, *Building Design*, *Planning in London*, *Urban Design Quarterly*, English Heritage's *Conservation Bulletin*, *Church Building and Heritage Review*, *The Victorian – The magazine of the Victorian Society*, and *Ecclesiology Today*; and
- Diverse policy and guidance documents for Westminster City Council and English Heritage.

The consultancy

PAUL VELLUET - CHARTERED ARCHITECT is an independent consultancy specialising in the provision of professional and technical advice to property owners, prospective developers and other planning and building professionals on projects involving new development in historic areas and the conservation, alteration and extension of historic buildings, particularly at the critical pre-planning and planning stages.

Established at the beginning of 2005, the consultancy undertakes work for commercial, educational, residential, cultural, diplomatic, church, health-sector, hospitality-sector and local authority clients together with the historic London estates, historic building trusts, and local amenity and community groups.

Work undertaken by the consultancy includes:

- Research and the preparation of assessments of the architectural and historic interest and significance of historic buildings and sites;
- The drafting and submission of documentation supporting proposed development and works in relation to national, London-wide and local planning and conservation policies and guidance;
- Support for appellants and local planning authorities in Written Appeals, Informal Hearings and Public Inquiries and for property owners at Lands Tribunal Hearings; and
- Collaborative and creative engagement with local authority planning and conservation officers.

APPENDIX B THE HISTORY AND DEVELOPMENT OF THE STATION TO THE PRESENT

B.1 The history and development of South Kensington Station is complex.

THE ORIGINAL STATION

B.2 First known as Brompton Exchange Station, South Kensington Station formed part of the extensive and coherent series of works undertaken between 1865 and 1870 comprising the excavation and construction of the 25 feet wide sub-surface tunnels (and 50 feet wide cuttings for stations) and tracks for an extension of the Metropolitan Railway (now the Circle Line) from Edgware Road Station via Paddington, Bayswater, Notting Hill Gate, Kensington (High Street) – now High Street Kensington - and Brompton (Gloucester Road) – now Gloucester Road - Stations terminating at South Kensington Station, and the sub-surface tunnels, cuttings and tracks from West Brompton Station via Gloucester Road Station through South Kensington Station onwards via Sloane Square, Victoria and St James's Park Stations to Westminster Bridge Station (now Westminster Station) for a new Metropolitan District Railway; the construction of substantially scaled, arcaded revetments serving the ventilation-openings above the tracks between stations, and the sub-service platforms at the stations; the construction of surface-level station buildings and wide-span, elliptically-arched, glazed roofs above the station-platforms, except at Westminster Bridge Station*; sub-surface platforms and staircase connections** between the two; and a considerable number of bridges at surface-level carrying roads across the new sub-surface railway.

* The original, glazed roofs survive at Paddington and Notting Hill Gate Stations.

** Two staircases, one up – one down, serving each platform from a footbridge spanning the tracks at an intermediate level between the surface-level booking-hall and sub-surface-level platforms.

B.3 The works were designed and implemented under the direction of John Fowler (1817-1898), Chief Engineer of both the Metropolitan Railway and the Metropolitan District Railway and his principal assistant, Thomas Marr-Johnson (1826-1874), and Frederick Cooper, the Chief Resident Engineer for the Metropolitan District Railway. In many respects the design, detailing and materials of the stations developed by the two companies in the 1860s and 1870s show a considerable degree of consistency at both surface-level and at sub-surface level, which is still readily discernible at South Kensington and at other stations where the greater part or significant parts of the original stations survive such as those at Paddington and Notting Hill Gate, and in limited part, that at Bayswater.

B.4 The original works at South Kensington completed in December, 1868 comprised the creation of two, approximately 300 feet long, 15 feet wide, timber platforms located on the northern side of the present station site, serving the tracks for eastbound and westbound trains, covered by an approximately 45 feet span, elliptically-arched glazed roof, springing from decorative, iron brackets located at high level along the steeply sloping, deep-set, semi-circular-arcaded revetment along the northern platform and on

a line of seventeen, freestanding, cast-iron columns, located at approximately 22 feet centres along the southern platform. In anticipation of expansion southwards to accommodate future separate platforms for the Metropolitan District Railway, a temporary, concrete retaining-wall was located along the back of the southern platform. A station building was provided at surface-level extending across the tracks and the original platforms on the northern side of the present station site carried on riveted, composite, iron beams at the western end of the present station site. A wide, centrally-aligned, iron staircase led down from the booking-hall to an openwork, iron footbridge at a lower, intermediate level, spanning the tracks from which further iron staircases led down to each platform.

- B.5 The development of the original station required the acquisition from the Alexander Estate and the demolition of half the existing houses along the southern side of Alfred Place West – now Thurloe Street - houses at the western end of the northern side of Pelham Street, and the entirety of Alfred Place Mews that ran between the two streets accessed from Alfred Place West.
- B.6 Metropolitan Railway services from Edgware Road to South Kensington and Metropolitan District Railway services from South Kensington to Westminster Bridge (operated by the Metropolitan Railway until 2nd July, 1871) were commenced on the 24th December, 1868, and Metropolitan District Railway services - from West Brompton to South Kensington via Gloucester Road on 1st August, 1870.
- B.7 By July, 1871, the station had been extended southwards by the creation of separate eastbound and westbound tracks for the use of Metropolitan District Railway trains and three, island platforms; by a single-ended reversing-bay accessed from the west for Metropolitan Railway trains and a single-ended reversing-bay accessed from the east for Metropolitan District Railway trains, located to the south of the original eastbound and westbound tracks for the Metropolitan Railway and to the south of the new eastbound and westbound tracks for the Metropolitan District Railway respectively. The substantial, southern extension to the station required the acquisition from the Henry Smith Charity and the demolition of the remaining, 'valuable and recently-built houses' along the northern side of Pelham Street, including the terrace of houses on the western side of Pelham Place North – now the road and bridge linking Pelham Street to the south-western corner of Thurloe Square. See copies of coloured diagrams showing the configuration of the sub-surface station as first completed in 1868 and as substantially extended by 1871 on pages 49 and 57 of M.A.C. Horne's *London District Railway: A History of the Metropolitan District Railway – Volume One: Nineteenth Century* (Capital Transport, 2018) and copies of extracts of the 60-inch (1: 1056) scale, Ordnance Survey mapping of the area in 1867, 1895 and 1915 attached in Appendix E.
- B.8 All but one of the new tracks and part of one of the new platforms were covered by an approximately 60 feet span, elliptically-arched, glazed roof, springing from the original line of seventeen freestanding, cast-iron columns, located at approximately 22 feet centres along the original platform serving westbound Metropolitan Railway trains and by a parallel line of matching columns located at approximately 22 feet centres along the new platform serving westbound Metropolitan District Railway trains. The southernmost track – serving the single-ended reversing-bay for Metropolitan District

Railway trains – and the southern half of the platform serving westbound Metropolitan District Railway trains was covered by a shallow-pitched, glazed roof supported on iron beams (effectively struts containing the horizontal thrust of the new, elliptically-arched, glazed roof) spanning between decorative, iron brackets located at high level along the steeply sloping, deep-set semi-circular-arcaded revetment along the southern side of the southernmost track – serving the single-ended reversing-bay for Metropolitan District Railway trains, and the line of seventeen, freestanding, cast-iron columns supporting the southern edge of the new elliptically-arched, glazed roof. See copies of photographs of the sub-surface station at platform level looking westwards attached taken in the 1890s attached in Appendix E.

- B.9 Importantly, the steeply sloping, semi-circular-arcaded revetments that extend along the northernmost platform of the station and the southern side of the southernmost track of the extended station of 1871 which still survive substantially not only still define the northern and southern boundaries of the present station - each comprising originally some thirty-four and thirty-one arches respectively - built in white/light cream gault brick matching the facing-brick used for the original surface-level station buildings from the Arlesey brick-fields, but also define the eastern and western limits of the sixteen bays of the two, original and now lost, elliptically-arched, glazed roofs and the now-lost, original, shallow-pitched, glazed roof above the southernmost track as completed in 1871. Between the eastern end of the glazed roofs and platforms and the bridge carrying the surface-level road from Pelham Street into the south-western corner of Thurloe Square, the width of the wide cutting containing the sub-surface station narrows modestly with the revetments built in red brick rather than gault brick and with simpler, segmental-arched recesses rather than more classically detailed semi-circular-arched recesses.
- B.10 Importantly, too, except at the western end of the southern side of the station where the new, Great Northern, Piccadilly and Brompton Railway surface-level station building and the two, wide, circular shafts containing lifts and the staircase leading to the deep-level platforms were constructed between ca 1905 and 1907, and where the new escalator-shaft and escalators linking the enlarged, combined ticket-hall at intermediate level to the lower escalators and stairs leading to the deep-level platforms were constructed between ca 1973 and 1974, the full height of the revetments survive. As shown in the photographs in Appendix E, the piers between each pair of wide, deep-set, segmental-arched recesses correspond to the approximately 22 feet spacing of the trusses of the now-lost, elliptically-arched, glazed roofs and now-lost, original, shallow-pitched, glazed roof along the southern side of the station. Centrally aligned above each pair of arched recesses are groups of three, small, semi-circular arched recesses.
- B.11 The lofty, generously proportioned and day-lit interior of the station as created between 1868 and 1871 is clearly shown in photographs of the station at platform level looking westwards taken in the 1890s – see Appendix E.
- B.12 At surface-level, the original station building spanning the tracks was approached by canopied entrances from Alfred Place West - now Thurloe Street, to the north and from Pelham Street to the south. See copies of original drawings of the building attached in Appendix E showing the Pelham Street entrance and a section-elevation of

the building as seen from the west. It is understood that the original, external western wall of the original booking-hall survives and is embedded in the existing rear (western) wall of the row of shops lining the western side of the arcade – nos. 1 to 13 (odd), South Kensington Station Arcade.

THE STATION AS ALTERED

- B.13 In May, 1885, the then Prince of Wales opened an eighteen-foot wide, pedestrian subway promoted by the Metropolitan District Railway linking the north side of the station at sub-surface level to the northern end of Exhibition Road - just south of the junction with the present Imperial College Road - providing direct access between the station and the former international exhibitions site and the gardens of the Royal Horticultural Society - now the site of the Science Museum and Imperial College – with intermediate access points to the South Kensington Museum – now the Victoria and Albert Museum – and the grounds of the Natural History Society. The subway, built under the direction of Sir John Wolfe Barry with J.S. McCleary was added to the *National Heritage List for England* in April, 2006.
- B.14 In 1903-1904 major changes to the original, sub-surface station were effected – possibly in anticipation of the potential development of a new deep-level station at South Kensington - including the reconfiguration of a number of the tracks and platforms, the complete removal of the two, elliptically-arched, glazed roofs, the provision of individual, glazed, timber platform-canopies with decorative, timber valances located on the mostly, still-surviving pairs of cast-iron columns along the northernmost, double-faced island-platform and on the still-surviving, pairs of cast-iron columns along the central island-platform, and alterations to the surface-level station building. The single columns supporting the canopies along the northernmost platform have long been removed. See photographs of the sub-surface station platforms and platform- canopies today attached in Appendix E.
- B.15 At sub-surface level, the works – possibly under the direction of or in conjunction with Harry Wharton Ford (1875-1947), the Metropolitan District Railway's Architect between 1900 and 1911- included the reconfiguration of the tracks and platforms involved changes to the southern side of the station comprising the removal of the tracks in the southernmost, single-ended reversing-bay and its substitution with a new platform adjacent to the arcaded, southern revetment, serving an additional through-track carrying westbound Metropolitan District Line trains.
- B.16 A similarly significant change to the 1860s station was the construction of a new, deep-level station at South Kensington serving the Underground Electric Railways Company of London's (UERL's) Great Northern, Piccadilly and Brompton Railway between Finsbury Park and Hammersmith – now the Piccadilly Line - on which services began on the 15th December, 1906 – with the new station at South Kensington opening on the 8th January, 1907.
- B.17 The new station, located at the western end of the southern side of the original sub-surface station, comprised a new, two-storey, steel-framed, surface-level building fronting Pelham Street with its own entrance and exit, containing the booking-hall, access to the lifts, staircase and other ancillary accommodation at street-level, and the

lift-winding gear and motors and other ancillary accommodation at first floor level; linked to the three hundred and fifty feet long platforms serving eastbound and westbound trains at two levels at deep-level with a twenty-three feet diameter shaft containing the lifts and an eighteen feet diameter shaft containing the staircase – a standard arrangement, sometimes with an additional shaft for lifts, reflected in other first-generation, UERL stations of the period.

- B.18 Like other such stations, designed by the company's architect, Leslie Green (1875-1908), the street elevation was faced in deep, ruby-red (*sang de boeuf*) faience blocks and shared the same distinctive architectural character of all the new stations, with lettering displayed prominently in a deep band stretching across the full width of the elevation between the upper and lower storeys carrying the wording 'SOUTH KENSINGTON STATION' in black lettering on a white background. Like other stations, too, the internal, steel framework and the flat roof provided for the potential upward extension of the building to provide entirely separate, lettable commercial floor-space. However, like many such stations across London, such additional accommodation was never realized, and the building has remained at the same overall height over the last one hundred and fifteen years. See photograph of the surface-level station building serving the new deep-level platforms soon after completion and opening attached in Appendix E and photographs of the station today attached in Appendix F.
- B.19 At surface level, the Metropolitan Railway and Metropolitan District Railway commissioned George Sherrin (1843-1909), the Metropolitan's company architect - possibly in conjunction with Harry Wharton, the Metropolitan District Railway's Architect between 1900 and 1911 - to create entirely new surface-level entrances to the earlier, sub-surface station, entered from Alfred Place West – now Thurloe Street - from the north, and Pelham Street - from the south, through elegantly proportioned, single-storey, classically detailed Portland Stone facades linked internally by an arcade, lined on each side with shop-units (nos. 1 to 13 (odd) and nos. 2 to 12 (even), South Kensington Station Arcade), with elegantly detailed bronze-framed shop-fronts and top-lit from a delicately detailed, glazed roof extending north to south, all extending over the site of the original, 1860s surface-level station building.
- B.20 Two, symmetrically placed flights of steps ran down from the eastern side of the arcade to a new, generously-proportioned, classically-detailed Booking Hall at intermediate level, top-lit from a centrally placed, hipped lantern-light, from which staircases ran down to the four sub-surface platforms and to the subway leading to Exhibition Road added in 1885. A timber-panelled, semi-circular ticket-office – now removed - projected into the booking-hall on its western side. It is reasonably assumed that the long (ten-bay), two-storey, red-brick staff or administrative building with a slated, hipped roof and tall stacks that rises above the rear of the shops on the eastern side of the arcade at street level and the roof of the western side of the booking hall at lower level was added at this time. The arcade and the booking-hall survive although adversely altered in part. See photographs of the arcade, the booking-hall and other surface-level station buildings today, attached in Appendix F.
- B.21 Key features of the two, new, classically-detailed street-entrances to the station and arcade were finely detailed, decorative ironwork grills of Arts and Crafts character

carrying the words 'SOUTH KENSINGTON STATION' and 'METROPOLITAN AND DISTRICT RAILWAYS' in gilt-letters, located at high level in the spaces between the columns and pilasters, with individual lettering placed in the stone panels directly above, proclaiming 'METROPOLITAN RAILWAY' above the entrance to Alfred Place West and 'DISTRICT RAILWAY' above the entrance from Pelham Street. The decorative grills and gilt lettering survive but the lettering in the stone panels above has long been removed. See photographs of the street-entrances to the arcade and station today, attached in Appendix F.

- B.22 Soon after the completion of the new station early in 1907, the greater part of the original boundary-wall to the station on its southern side was demolished and a row of thirteen, modestly scaled, two-storey shops were built along Pelham Street (Station Buildings at nos. 15 to 39 (odd), Pelham Street) to the immediate east of the new surface-level station directly above the former, single-ended, reversing bay of the sub-surface station supported on the existing ironwork beams spanning between the southern arcaded revetment and the free-standing, cast-iron columns that once supported the thirteen bays of the southern edge of the former, elliptically-arched, glazed roof. The row of shops was demolished in 1973 and replaced by the present approximately 5 feet (1.5 m.) high wall along Pelham Street.
- B.23 Sometime after the completion of the new entrances from Alfred Place West and Pelham Street, the railway companies created further commercial development, by decking over the remaining, northern part of the opening above the tracks to the immediate west of the original, surface-level station building which had originally provided a generously sized outlet for smoke and fumes from the steam locomotives that passed below up until 1905, and by replacing existing modestly sized buildings that had been built over the southern part of the outlet, to provide a parade of single-storey shops – some with mezzanines - extending around the 'bullnose' curve between Alfred Place West and Pelham Street – the present nos. 36 to 46 (even), Thurloe Street and nos. 1 to 9 (odd), Pelham Street. Whilst much simpler in detail than the new, single-storey, classically detailed, Portland Stone entrances to the arcade and the station, the height of the new, curving parade of shops maintained the same height as the entrances and the same cornice-profile along parapet to the extensive, flat roof. See photographs of the parade today, attached in Appendix F.

(In this connection, I consider that in this, the group foreshadows Charles Holden's low-rise, grade II* listed Southgate Station of 1933 – one of the key stations of London Underground's 'classic' period where the station has been successfully integrated with a retail premises, and Brian Lewis and Curtis and Maclver's low-rise, unlisted Hanger Lane Station of 1948. The stations at Southgate and Hanger Lane are both circular on plan and their concourses top-lit, as at South Kensington Station).

- B.24 In 1957, the surviving central, single-ended reversing-bay at sub-surface level was taken out of service, back-filled and landscaped and the two island-platforms to north and south combined to create one, wide, island platform. Between 1967 and 1969, the northernmost and southernmost platforms were taken out of service – in January, 1967 and March, 1969 respectively - and their platform-canopies removed, leaving eastbound trains and westbound trains using only the wide, central, island platform. Around this time, the former Metropolitan and Metropolitan District Railway and

former Great Northern, Piccadilly and Brompton Railway stations were connected directly with a shared booking-hall.

- B.25 Between 1971 and 1974, major works were carried out at the station to provide direct escalator access to the deep-level platforms serving the Piccadilly Line from the booking-hall and from new staircases leading down to connecting passageways from the centre of the widened island-platform, leaving the original lift-shafts disused. The works also involved the complete removal of the redundant, southern island platform, and, most regrettably, the single-storey exit-wing to Leslie Green's surface-level station building on its eastern side and six bays of the original, arcaded revetment on the south side of the station at its western end. The works also involved the creation of a major extension attached to east side of the Booking Hall supported on new concrete columns - its sides and hipped roof-slopes faced in corrugated-metal cladding.
- B.26 In January, 2018, the Council granted 'Prior Approval' and Listed Building Consent (application references PA/17/05372 and LB/17/06308) for a range of works comprising the first phase in a three-phase project for providing improvements to the station including enhanced 'step-free' from street-level and from the subway leading to the museums, to the District Line and Circle Lines sub-surface platforms and to the Piccadilly Line deep-level platforms, via the combined and enhanced ticket-hall.
- B.27 The first phase – the South Kensington Station Capacity Upgrade - comprised the proposed enlargement and reconfiguration of the existing ticket-hall, the provision of lift-shafts – but not lift-cars – linking the extended ticket-hall at intermediate level to the sub-surface platforms, and the bringing back into use and widening of the long redundant, northernmost, sub-surface platform, and its being provided with a new, free-standing platform-canopy, and an emergency exit at its eastern end. The approved works were due to commence in 2018. However, the substantive part of the project remains to be undertaken – TfL having formally 'paused' the works in July, 2020 with no indication of when they will be restarted.

APPENDIX C THE LISTING-ENTRY FOR THE STATION AND THE ACCOMPANYING TEXT FROM THE NATIONAL HERITAGE LIST FOR ENGLAND

Official list entry

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1392067

Date first listed:

27-Aug-2004

Statutory Address 1:

SOUTH KENSINGTON UNDERGROUND STATION

Location

Statutory Address:

SOUTH KENSINGTON UNDERGROUND STATION

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Kensington and Chelsea (London Borough)

Parish:

Non Civil Parish

National Grid Reference:

TQ 26846 78825

Details

249/0/10256 South Kensington Underground Station 27-AUG-04

GV II

South Kensington Underground Station. 1867-68, substantially altered 1907. Original design by Sir John Fowler, engineer to the Metropolitan Line; Edwardian arcade by George Sherrin. EXTERIOR: Arcade at street level, running from Thurlow Street to Pelham Street, with a glazed barrel-vaulted roof above shops on each side. Wrought iron screens at either end inscribed SOUTH KENSINGTON STATION and METROPOLITAN AND DISTRICT RAILWAY. INTERIOR: Arcade is lined with shops: seven on west side, six on the east. Two retain original glazed shop fronts of high quality. Doric pilasters divide the units. At upper platform level, used by the District & Circle Lines, original arcaded revetments of pale yellow brick remain in situ: the lower tier of tall arches has keystones, header arches, imposts and bases while the shorter upper tier has gauged arches with keystones. HISTORY: This station terminated the southward continuation of the world's first underground railway line, and was opened on Christmas Eve, 1868. It was originally called Brompton Exchange. In 1871 the District Railway constructed extra platforms and a separate entrance here, the company having fallen out with the Metropolitan Railway. In 1905-06 a deep-level Piccadilly Line link was constructed: Leslie Green designed a separate entrance on

Pelham Street. At this time too the Metropolitan Railway engaged George Sherrin to remodel the entrance and booking hall, and to lay out a street-level arcade between Thurloe and Pelham Streets. Sherrin was responsible too for replacing Fowler's iron spans over the platforms with the present wood roof carried on iron columns. The booking hall was substantially altered in 1951. ASSESSMENT OF IMPORTANCE. The special interest of South Kensington Station resides in the survival of the arcaded 1867-68 revetments, which belong to the first generation of underground architecture anywhere in the world. Sherrin's arcade possesses special interest as a fine survivor of Edwardian retail architecture. The rest of the station is not regarded as possessing special interest, although the 1907 Leslie Green-designed frontage on Pelham Street clearly makes a positive contribution to the conservation area. The underpass to Exhibition Road is separately listed.

SOURCE: Survey of London vol XLI, 'South Kensington: Brompton' (1983), 79-80 & 117; David Lawrence, 'Underground Architecture'(1994), 13-14, 40.

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

491726

Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

.End of official list entry

APPENDIX D THE PLANNING CONTEXT – POLICIES AND GUIDANCE

The policies to which I have referred in my consideration of the external design of the appeal proposals – specifically in relation to the issues of height and bulk - include the following:

Policies CP2, CP3, CLI, CL2, CL3, CL4, CL8, CL9, CLI0, CLI1 and CLI2 of the *Kensington and Chelsea Local Plan* of September, 2019;

Policies D3, D4, D5 and HC1 of the *London Plan* of March, 2021; and

Paragraphs 130, 197, 199, 200, 201, 202, 203 and 206 of the *National Planning Policy Framework* of July, 2021.

The guidance to which I have referred in my consideration of the external design of the appeal proposals – specifically in relation to the issues of height and bulk - include the following:

Paragraphs 006, 007, 008, 009, 012, 013, 014, 015, 016, 018, 019, 020 and 023 of *National Planning Practice Guidance: Historic Environment* of July, 2019.

Paragraphs 001 and 012 of *National Planning Practice Guidance: Design: Process and Tools* of October, 2019.

The paragraphs relating to Context, Identity and Built Form contained in the *National Design Guide* of January, 2021.

Paragraphs relating to designated and non-designated heritage assets contained in the *National Planning Practice Guidance* of July, 2019 and in Historic England's *Historic Environment Good Practice Advice in Planning: 2, Managing Significance in Decision-taking in the Historic Environment* of July, 2015.

In addition, I have also referred to the Royal Borough of Kensington and Chelsea Council's *Thurloe Estate and Smith's Charity Conservation Area Appraisal* of October, 2016 in my consideration of the external design of the Appeal proposals – specifically in relation to their heights and massing, and to the Council's *Building Heights in the Royal Borough Supplementary Planning Document* of July, 2021, in relation to the protection of views (LV8).