

TOLA OBJECTION TO:

Local Planning Authority Application References: PP/21/00471

TOLA's objection to the Wellcome Trust's application to demolish 63-81 Pelham Street, and to replace it with a new office building, is principally based on concerns referencing:

- Lack of adherence to the new London Plan 2021 as regards sustainability,
- Overdevelopment,
- Adverse impact on the adjoining Conservation Area,
- Inadequate arrangements for servicing and
- Lack of either social or economic benefit.

In support of this objection please find attached the following reports:

- Planning Policy Objection, by DEB Town Planning and Development Ltd,
- Independent Transport Audit, by Paul Mew Associates,
- Assessment Report of Volterra's Economic Benefits Statement, by Pegasus Group
- Verified Views, by Rendered Images

DEMOLITION AND SUSTAINABILITY

We oppose the demolition of this building. The submitted documents do not provide adequate demonstration of a serious initial commitment to retaining or refitting the building. If approved, this will create a dangerous precedent for demolition – particularly in sensitive and vulnerable streets such as Pelham Street which serves as the interstice between two parts of the Thurloe and Smith's Charity Conservation Area.

In light of RBKC's target of net zero carbon by 2030, it is unfortunate that Wellcome has not fully explored the possibility of retaining the current building. It is not evident that the applicant seriously considered a retention option, and it would seem drawings were produced as a pretence without serious consideration given to the possibility of retention.

They have neglected to provide the life cycle analysis required as part of the application in order to validate the demolition of the building. This is especially the case as the applicant has chosen not to conserve the existing building but to demolish the high-quality bottom two floors – without even retaining the façade. The option of retaining the façade is dismissed on the basis of the condition of the existing stone. It should be noted that Wellcome has owned this building for over 25 years; if the façade has deteriorated it is part due to their neglect. A policy of wilful neglect should not be rewarded by permission to demolish.

As is required by the new London Plan 2021, (SI 1 E and SI 2), the embodied carbon loss for demolishing the existing building has not been established, neither has the embodied carbon of the new structure been quantified. There is no evidence that proposals will ensure that emissions will be reduced to meet the requirements of Air Quality Neutral or assessment of proposals to make the impact of development on local air quality acceptable.

Alternatively, the economically attractive possibility of new construction offered Wellcome Trust the opportunity to commission an exemplar, which could have served as a beacon and template for future sustainable architecture in the Borough. Unfortunately, this

opportunity has not been seized, and the resulting proposed building is not aspirational – at least not in terms of sustainability.

The principles of the Circular Economy as set out in the Circular Economy Statement (Policy SI 7) have not been addressed. Following these principles, new materials should be minimised, and waste and flexible use should be maximised. These principles have not been incorporated into the fabric of the design of this new building.

SI 7 also requires that waste reduction is incorporated from project inception to completion, including modular build and re-use of secondary products and materials designed for longevity. The proposed pre-cast concrete building, with extensive glazing and unobscured windows – even when overlooking neighbours to the north and south - does not reflect those aspirations.

It is worth noting that despite concern expressed by many residents during the consultation period about the exposed western gable, the developer has not proposed any mitigation – such as creating a living green wall. No credible landscape strategy – while touted as being fundamental to the ‘green’ design in reference to terraces - exists. In stark comparison to the landscaping strategy for 40 Pelham Street, references to landscaping at 63-81 is unbinding and illusory, ungrounded in detail or commitment.

It is worth noting that the local Residents Associations approached more than 5 environmental/sustainability engineering/architecture firms in order to commission reports examining the applicant’s submissions; not one of them was able to work ‘in opposition’ to The Wellcome Trust as each was conflicted. The question arises as to how broadly the Wellcome Trust diffused its instructions to relevant firms, and to what purpose. The monopolisation of specialist consultants has seriously undermined the Residents’ Association’s ability to retain professional criticism of the applicant’s submissions, as they relate to sustainability.

We are generally supportive of the approach taken by Wellcome on 40 Pelham Street, where the architect has been largely responsive to residents and designed a green and sensitive refurbishment that is appropriate to the site, although there remains a significant issue with overlooking and loss of privacy. We object to the opposite approach having been taken for 63-81 Pelham Street, **where the site has been designed for maximum capacity rather than optimum capacity**, This is important in light of the new London Plan, which states in 3.3.1, *‘The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development.....is the optimum development for the site’*.

OVERDEVELOPMENT

The proposed building is 116% larger than the existing one. The GIA of the existing building is 5,271sqm, while the proposed scheme will measure 11,382sqm. It is in effect 3 storeys higher. The 7th storey is ‘plant’, but at over 2 metres tall it reads as a 7th storey.

There is no space provided at street level. The new building extends beyond the adjoining Georgian terraces to present a monolithic face to the street, crowding the narrow pavement, and exposing an unforgiving and bulky west gable to those traveling eastwards on Pelham Street.

Deliveries

The existing building includes space for vehicular access, for deliveries, and rubbish collection within the footprint of the property. The proposed building provides none of those capacities, the developer clearly preferring to export any non-remunerative uses to the public realm. It is inappropriate to design a new building that does not accommodate obvious needs of servicing, deliveries and rubbish collection. The design does not put forward sustainable design that is responsive to the inherent requirements of the neighbourhood, as well as the building. This is an unacceptable infringement of the public realm for private commercial profit.

Mass

Not only is the new building too large for the site, it is too large contextually. Protruding 18 metres above the adjoining Georgian terrace to the west, and one storey above Crompton Court to the east, it is an inappropriate, incongruous and uncomfortable addition. Neither does the building draw on the vocabulary of the adjoining conservation area which is primarily stucco, brick, and stone. The proposed 'palazzo' would consist of pre-cast concrete and excessive glazing.

We would like to highlight the absurdity of taking Crompton Court, a corner building fronting onto Brompton Road as a reference point for the height of the proposed new building. Quite clearly, Crompton Court sits at the corner with Brompton Road, providing a visual anchor for Pelham Street. It was never intended for the height of the corner building to be continued down the narrow street creating a scale to street ratio contravening Policy CR2.

As the attached planning report details, the proposed building is *"imposed onto, rather than integrated into the street scene"*. This is contrary to numerous policies, such as CL1, CL2 (ii), CL2 (iii), CL11 and most starkly CL12 (1) which references the necessity to *"reflect the prevailing building heights within the context."*

OVERLOOKING

The applicant has indicated that as the 18m distance is met, there is no obligation on their part to shield neighbouring residents from loss of privacy or from a sense of enclosure. The proposed office building is surrounded on 3 sides by much smaller homes which exacerbates the ability to look down from offices into neighbouring homes and gardens. On the fourth side, the proposed building would immediately border flats of Crompton Court. The verified views taken by Rendered Images demonstrate how incredibly intrusive these offices would be. The large windows – which are unobscured - offer unrestricted views into the gardens, living rooms and bedrooms of South Terrace, south side of Thurloe Square, and the Pelhams. The sense of enclosure, lack of privacy and degree of overlooking into west facing flats of Crompton Court would be especially harmful. It is puzzling why the applicant has not chosen to take advantage of any of the many techniques available that would allow light

into offices, without allowing such dramatic loss of privacy to neighbours. The overlooking which would be incurred by the proposed building contravenes many policies, among them Policy CV1 and CL5 of the RBKC Local Plan.

CONSERVATION AREA

Much has been made by the developer of the site's location outside a Conservation Area. 63-81 Pelham Street is directly adjacent to a Grade II listed terrace, overlooking, to the south, the Pelhams which are Grade II, and Grade II* listed, and, overlooking to the north, Thurloe Square and South Terrace which are Grade II listed. 63-81 Pelham is wedged into Thurloe and Smith's Charity Conservation Area. To divorce the site from its location, and to suggest the building would have no impact on the adjacent Conservation Area is disingenuous at best, and patently incorrect.

As the attached planning report by DEB expresses in greater depth, Policy CL1 (b) requires a development to '*respond to the local context*'. This building would replace the austere, restrained stone building of Sir Stanley Peach with a self-aggrandising pre-cast concrete and glass palazzo – complete with double height arches. The proposed building would overwhelm, rather than contribute to and enhance the adjacent Conservation Area, as is required by Policy HC1 (C) of the London Plan.

TRAFFIC

The degree to which the proposed scheme is unsustainable, inappropriate and unsafe becomes apparent when delving into the potential impact of a building more than twice as large as the existing building, attracting approximately 700 plus more people per working day. As the Traffic and Waste report establishes, the applicant has significantly underestimated the amount of waste generated, the number of deliveries incurred, the amount of time each delivery is projected to take, the potential for conflict between buses and construction vehicles during construction, the likelihood of conflict between buses and delivery vehicles after construction, and safety issues for pedestrians (including school children and families) navigating crowded and unusually narrow pavements. The report is a damning indictment of contradictory, sloppy, and misleading information by the applicant to RBKC planners. It is equally concerned by the probable and predictable effects of the imposition of overdevelopment on a narrow, heavily used back street. These ramifications will not be felt only during construction, but will permanently impact South Kensington. The consequences of this proposed development will be the legacy of unmoderated and unrestrained over-development.

The impact of increased traffic is incorrectly and disingenuously assessed by the applicant, as the base line traffic analysis took place in the immediate run up to the Covid-19 lockdown, a time at which schools, restaurants, pubs, gyms, and movie theatres were shut down. It can be fairly surmised there would be less traffic in those circumstances. There is no date given for when the parking survey was made; but as the applicant states that the pay and display bays are not in heavy use, one can assume the survey was made at the same time--any resident or visitor knows that there is no excess of pay and display bays in South Kensington.

The issue of pay-and-display is uniquely complicated in RBKC as there is no zoned residents' parking. This leads to a situation where residents from other parts of the Borough can drive to park in residents' bays which are near their preferred tube stop. Therefore, there is significant demand for residents' parking spaces, particularly in the vicinity of major tube stations such as South Kensington. As new housing no longer comes with residents' parking permits, residents of new-builds use pay and display bays when driving within the Borough. Finally, assuming that some of the visitors to 63-81 Pelham Street will drive, they will need a place to park, and potentially charge their EVs. The pay-and-display bays directly in front of the building would be a logical place for them to do so.

The number of servicing trips has been vastly understated by the applicant, as has the length of time each delivery will take. The precision with which such deliveries can be scheduled has been overestimated – to a somewhat ludicrous degree.

As has been noted in the Paul Mew report, the applicant's consultant selected TRICS sites which the RBKC planners have suggested were unapplicable to the site in question. Using applicable sites, the proposed development could be expected to generate 107 servicing trips per day. This compares to the applicant's significantly lower forecasts of 18 servicing trips per day.

SAFETY ISSUES

Among the disquieting findings of the Paul Mews Traffic and Waste report is the observation that the applicant has not responded to problems raised in the Safety Audit which highlights the issue caused by the applicant proposing deliveries take place at loading bays which were previously pay and display bays. The Audit states: *"The northern footway is being widened to accommodate shared use parking / loading bays. However, the width of the carriageway at this point is being narrowed to 5.5m and there is a two-way local bus service with a frequency of every 12 minutes. Swept paths of buses were provided for assessment, where the margin for error is minimal, which could lead to vehicle incursion into shared use parking / loading bays, the opposing running lane or collisions with pedestrians on the southern footway.*

Large vehicle incursion into shared use parking / loading bays could lead to collisions with parked vehicles or vehicle to pedestrian collisions, whilst incursion into the opposing running lane could lead to side swipe collisions.

It is recommended that the northern footway width should be reduced, allowing the carriageway width to be widened thereby increasing the margin of error for passing buses. "

Pelham Street is widely accepted to be a narrow and busy street accommodating 2 bus lines as well as usual traffic. It is common for even small delivery vans to have to mount the pavement in order to allow passage of oncoming traffic. RBKC may find it worth focussing on safety issues which will be further compounded by workers arriving by bicycle – sharing the street with buses, cars, and delivery vans. As two buses are unable to pass each other, there is also no space for a cycle lane.

It would be unthinkable irresponsible to disregard these legitimate safety concerns; the fundamental catalyst for concern is inappropriate overdevelopment of the site which must be addressed.

It is unclear to residents why the developer should relocate the delivery bays which are currently situated within the existing building, to pay-and-display bays which are forecast to create congestion, collisions, and pedestrian danger. It must be emphasised that Pelham Street is the main street used by school children and families on their way to and from homes south of the Fulham Road, and to and from the Marlborough Primary School on Sloane Avenue. The pavements (approximately 1.5 metres on the southern side) are even now congested with parents having to navigate the exceptionally narrow pavements.

As the applicant has stated, Pelham Street will not be closed during construction, but the northern pavement will be closed, with diversions to the footway on the south side of Pelham Street. It is problematic to imagine how all estimated 1,195 pedestrians (between 8am-9am) will manage to navigate a pavement 1.5 metres wide without stepping into a street which is already so narrow that 2 buses will not be able to pass each other simultaneously. The solid hoarding which will be erected along the northern boundary of the carriageway will further limit the ability of drivers to negotiate the available space.

No information is provided on how or where pedestrians will be diverted to the southern footway. Additionally, there has been no analysis from a road safety perspective.

Policy H2 seeks to *'enhance local context by delivering buildings that....minimise negative impacts on the environment, public realm and vulnerable road users'*

TOLA is concerned by the cumulative effects that increased traffic, increased deliveries, and increased pedestrian footfall will have on the constrained and inflexible space afforded by the street and pavements of Pelham Street. It is apparent to residents that the applicant has significantly underestimated the degree of increase, and the impact that increase will have on the well-being and safety of visitors and residents.

LACK of SOCIAL or ECONOMIC BENEFIT

GYM

In pre-application meeting with residents, and in the application itself, the applicant frequently referred to the major social benefit supplied by the reinstated public gym – a popular amenity. Volterra, in its SEB report refers to *"the replacement"* of the Class D1 gym space. What is not mentioned, is that the 'replaced' gym will be reduced by over 60%, to 39% of its current floor space, from 2,095sqm to 824sqm.

This is odd, as presumably the number of people using the gym will skyrocket given the influx of office workers the building is predicted to attract. As TOLA's SEB consultant Pegasus suggests, it is questionable whether a gym so reduced is even viable. **Clearly a gym which is reduced by over 60% sqm, in a building increased by 116% sqm, represents a dis-benefit.**

DEMAND FOR OFFICE SPACE

The premise for this application is based on the presumption that there is a large and growing need for office space within RBKC. The need for office space is the excuse which the applicant uses to impose a monolithic building on the varied and low built streetscape, to export commercial activities such as deliveries to the public realm, to justify overlooking, to defend the undermining of public safety. The premise is baseless. It is not grounded in fact. There is no current or predicted need for office space such as that provided by 63-81 Pelham Street. Policies E1 and E2 of the London Plan note that the market is restructuring; the need for small offices is in short supply – not expensive open plan offices. *The Plan specifically references that RBKC is noted for its creative industries, not financial services.* It is highly unlikely the proposed scheme will provide the low-cost, flexible, small office spaces required by the creative industries.

Although Wellcome Trust is free to make its own assessments about office space, it is the responsibility of RBKC to determine whether the fulfilment of that fictional need should be imposed on the fabric of South Kensington.

The Pegasus report details *“the more nuanced reality of office-based employment...which shows growth has been far less than imagined, together with the reduction in office based employment among residents, together with changing trends in uses and requirements for office space, it is easy to see that the loss of office floorspace in the Borough is nothing more than a market response to a sustained period of reduced need.”*

In addition, *“RBKC monitoring data ... shows that in recent years planning permissions have exceeded completions. This is clear evidence that there is no issue of planning permissions preventing the development of office floorspace. This shows that permissions have been granted but development has often not gone ahead.”*

The existing building has plenty of capacity to offer low-cost flexible office space, of the type required in RBKC. Unfortunately, the office space which would be delivered by the scheme responds to the developer’s ambition for the greatest possible financial return, rather than RBKC’s objective of achieving sustainable growth which will strengthen the local economy.

EMPLOYMENT

The applicant compares the number of employees working in the existing site, vs the number of employees who would potentially be employed were the scheme to be built. This is misleading, as the current building is very obviously underutilised. The Pegasus report details that contrary to the applicant’s assumptions, the levels of displacement are high, and the number of increased FTEs is low.

In any case, it cannot be demonstrated that this kind of office space would attract employers, as evidence for an unmet need for large, expensive office space in the Borough doesn’t exist.

LACK OF MEANINGFUL ENGAGEMENT

It is with considerable regret that TOLA has felt it necessary to object in such strong terms to this application. The Wellcome Trust engaged Cascade Communications, a public relations firm, to be the interface between the residents and the applicant. It is TOLA’s experience that although Cascade arranged and conducted multiple meetings among residents’ associations, and the architects, and Wellcome, these meetings were window dressing and were arranged to check the ‘community engagement’ box. We were often told that our

concerns were irrelevant because ‘RBKC planners had accepted our plans’ – although we now know that was not necessarily the case. We did not feel a sense of engagement, let alone partnership or respect. Cascade distributed a shameful questionnaire which did not allow the opportunity to oppose the size, mass, or design of 63-81 Pelham Street and then proceeded to advise residents of our wide-spread support for the scheme – on the basis on 56 responses.

CONCLUSION

We believe this scheme should be refused on the basis of excessive size. It is too tall, too wide, and too massive.

- The proposed building would be inappropriate for the narrow street it fronts, which it would visually overwhelm.
- It is an inappropriate addition to the adjacent Conservation Area, to which it is unrelated in terms of materials and form.
- The excessive height and glazing create a lack of privacy and sense of enclosure for neighbours.
- The building would bring no public benefits in terms of demonstrably needed office space or employment to either South Kensington, or to RBKC.
- The cost to the public in terms of a smaller gym, loss of parking, increased congestion, inadequate servicing, and significant threats to public safety are untenable.

We would like to make it clear that TOLA is not opposed to development of this site per se, but feel this scheme is neither sensitive, nor appropriate, nor in any way an improvement over what currently exists.

We, along with the many other local residents’ associations who unanimously oppose this scheme look forward to working in partnership with Wellcome to develop a plan which we can all support, and which would be to the benefit of the applicant, residents, and the visitors to South Kensington.

TOLA respectfully urges the Committee to reject this application.