

# K1 Site bounded by Brompton Road, Sloane Street, Basil Street and Hoopers Court, Knightsbridge SW3

in the Royal Borough of Kensington and Chelsea

planning application no. PP/16/00423

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

### The proposal

Demolition of 33-35 Brompton Road; partial demolition of 4a/5 Sloane Street at basement, ground and first floor level and partial demolition of nos. 1-9 Brompton Road and 1-3 Sloane Street, 13-27 Brompton Road and 2-8 Basil Street, 29-31 Brompton Road and 10-14 Basil Street behind retained facades. Redevelopment of Site to provide retail use, office, residential and restaurant use in a part seven, part eight storey building above three storey basement levels. Relocation of existing London Underground entrance; creation of space to facilitate provision of a new step-free London Underground entrance on Hooper's Court; together with amenity space, public realm enhancements, plant, car parking, servicing and access works, electricity sub-station and other associated works.

### Associated Listed Building Consent application (Ref: LB/16/00424)

Alterations to the ground floor facade to Sloane Street with insertion of new fenestration to the existing window openings. Removal of party wall between 4a and 5 at ground level and basement levels and links made in the party wall to adjacent properties. Lowering of basement floor level and the removal of staircases to basement.

### The applicant

The applicant is **Carraig Investments SARL**, the architect is **Fletcher Priest**, and the agent is **DP9**.

### Strategic issues

The proposed mixed use development within the CAZ and International Retail Centre is strongly supported in strategic planning terms; however issues with respect to **housing; affordable housing; urban design; inclusive design; transport;** and **climate change** should be addressed before the application is referred back to the Mayor at his decision making stage. **Mixed use; retail; air quality;** and **historic environment** policies are also relevant to this application.

### Recommendation

That Royal Borough of Kensington & Chelsea be advised that while the application is supported in strategic planning terms the application does not currently comply with the London Plan, for the reasons set out in paragraph 85 of this report; but that the possible remedies set out in paragraph 85 of this report could address these deficiencies.

## Context

1 On 4 February 2016 the Mayor of London received documents from the Royal Borough of Kensington & Chelsea notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 16 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- 1B 1. (b) *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres" and,*
- 1C 1.(c) *"Development which comprises or includes the erection of a building of one or more of the following descriptions — (c) the building is more than 30 metres high and is outside the City of London."*

3 Once Royal Borough of Kensington & Chelsea has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The site is bound by Brompton Road to the north, Sloane Street to the east, Basil Street to the south and Hooper's Court to the west, which provides a pedestrian cut-through between Basil Street and Brompton Road. The site forms the eastern portion of the Knightsbridge Estate; it is designated as an International Centre with a regional/sub-regional night-time economy within the London Plan and is located within the Central Activities Zone (CAZ) and sits between Harrods about 100 metres to the south with Harvey Nichols, One Hyde Park and the Mandarin Oriental Hotel immediately north and east.

6 The site is located within the Hans Town Conservation Area and one of the buildings on the site (4a/5 Sloane Street) is Grade II Listed. Knightsbridge underground station is located directly beneath the site, with its highly prominent entrance on the corner of Sloane Street and Brompton Road.

7 The site is currently occupied by a mix of land uses, commensurate with land uses in the surrounding area within this CAZ location. The ground floor contains a collection of retail type uses, with offices and some residential apartments on the upper floors. Buildings are generally between five and seven storey with some slightly taller corner elements. Heritage assets, both designated and undesignated are characteristic of the area, which also has a high quality public realm.

8 The site is in a highly accessible location (PTAL 6b) in central London and incorporates an entrance point to Knightsbridge underground station. Aside from Hyde Park Corner (also on the Piccadilly Line), Sloane Street is the only other station within one kilometre of the site.

Eight daytime and four night bus routes to various central and inner London destinations are also available in immediate proximity. The Transport for London Road Network includes Brompton Road (A4) and a red route return occupies the site's frontage onto Sloane Street. Knightsbridge (A315) forms part of the Strategic Road Network, and adjoins Brompton Road immediately to the north-west of the site.

9 TfL property interests, including freehold and licences, exist within, beneath and adjoining the site. The aforementioned stepped Knightsbridge Station entrance lies within the built form at the northern apex of the site.

## **Details of the proposal**

10 The proposal is to demolish the majority of the buildings on the site, but retain all of the facades onto the main external streets (Sloane Street, Brompton Road and Basil Street) and retain the listed building at 4a/5 Sloane Street. 33-35 Brompton Road (a post-war building) will be demolished and replaced.

11 The redevelopment proposals include a mix of uses aimed primarily at improving the quantum, layout and efficiency of the retail floorspace across the ground to second floors, providing up to approximately 9,500 sq.m, representing an uplift of 1,909 sq.m over the existing floorspace.

12 Office floorspace will also be provided, with an increase of 691 sq.m compared to the existing buildings. A rooftop restaurant/bar of circa 1,500 sq.m is proposed on the top two levels above the offices.

13 35 residential units for private rent are proposed in the remainder of the building above the retail and part of the office floors, with a second floor level communal courtyard in the centre of the block providing shared amenity for the occupants.

14 A double car lift is proposed off Basil Street providing access for cars and service vehicles into a three-story basement.

## **Case history**

15 An initial pre-planning application meeting was held on 18 November 2014 and an advice report was issued on 2 December 2014. In summary, the proposals to provide a mix of uses including significant improvement to the retail offer, with offices and an increase in residential units was strongly supported in the Central Activities Zone (CAZ) and International Retail Centre. While the design was broadly welcomed, the architect was asked to revisit certain aspects of the design and extent of demolition of the listed building. Further information was also requested on matters of affordable housing, transport (in particular parking and servicing), inclusive access and energy.

16 A follow-up meeting was held on 6 November 2015 and an advice report was issued on 17 November 2015. The design amendments to the scheme were considered to be positive and the heritage concerns had been addressed. Prior to the submission of the application, the applicant was advised to provide further information with regards to affordable housing, transport, energy and inclusive access.

## Strategic planning issues and relevant policies and guidance

17 The relevant issues and corresponding policies are as follows:

- Central Activities Zone *London Plan; draft Central Activities Zone SPG;*
- World city role *London Plan;*
- Retail *London Plan; Town Centres SPG;*
- Housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG;*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Heritage *London Plan;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable Development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*

18 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Royal Borough of Kensington & Chelsea's Consolidated Local Plan (July 2015) and the London Plan March 2015 (Consolidated with Alterations since 2011).

19 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance; and
- The draft Minor Alterations to the London Plan (MALP) (2015)

## Principle of development

20 As noted above, the site is located within the Central Activities Zone (CAZ) and within an International Retail Centre with a regional/sub-regional night time economy. The proposal seeks the redevelopment of the existing buildings, predominantly behind retained facades, plus extensions to increase floorspace for a number of uses, as set out in Table 1.

Use	Existing (GIA sq.m)	Proposed (GIA sq.m)	Difference (GIA sq.m)
Residential (Class C3)	1,233	7,284	+6,051
Retail (Class A1)	7,609	9,518	+1,909
Office (Class B1)	10,105	10,797	+692
Restaurant (Class A3)	0	1,418	+1,418

Medical (Class D1)	124	0	-124
Health Spa (Class D2)	92	0	-92
London Underground	154	666	512
Substation	186	29	-157
Nil Use (sui generis)	481	0	-481
<b>Total floorspace (GIA) (Sq.m)</b>	<b>19,984</b>	<b>29,712</b>	<b>+9,728</b>

Table 1: Existing and proposed development

21 London Plan Policies 2.1, 2.10 and 2.11 support a mix of uses within the CAZ commensurate with its character clusters to deliver London's World City role. The proposal for increased and enhanced retail, office and residential provision within the CAZ is strongly supported.

## Retail

22 Policy 2.15 (Town Centres), policy 4.7 (retail & town centres) and policy 4.8 (supporting a successful & diverse retail sector), provide the strategic retail policy context in which the applicant's proposals are considered. The site is within Knightsbridge, classified as an International Retail Centre within the London Plan.

23 In this location, and in close proximity to major high-end retailers such as Harrods and Harvey Nichols, it is noted that the current retail accommodation on this site is compromised, with small units and inflexible layouts that limit the capacity for expansion/upgrade in order to realise the International Retail Centre status and meet the demands of existing and would-be occupiers. The proposal to enhance the retail offer in quantitative, but more particularly qualitative terms, is strongly supported in accordance with London Plan Policies 2.10, 2.11 and 2.15.

## Housing

24 The proposal will deliver 35 residential units for the private rented sector (PRS), an uplift of 24 units as set out in Table 2. This is welcomed in line with London Plan policies 3.3 and 3.8.

Unit type	Existing	Proposed	Difference
One-bedroom	0	16	+16
Two-bedroom	7	9	+2
Three-bedroom	4	8	+4
Four-bedroom	0	2	+2
<b>Total units</b>	<b>11</b>	<b>35</b>	<b>+24</b>
<b>Total floorspace (GIA) (Sq.m)</b>	<b>1,233</b>	<b>7,284</b>	<b>+6,051</b>

Table 2: Residential mix

25 The development also includes a generous proportion of family-sized accommodation at 29%, which is particularly welcomed in this central location, in line with London Plan policy 3.8.

## Affordable Housing

26 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites. The tenure split suggested by the London Plan is 60% social/affordable rent and 40% shared ownership. The NPPF, the Mayor's Housing SPG and the London Plan state that to maximise affordable housing in London and provide a more diverse offer for the range of people requiring an affordable home, the affordable rent product should be utilised in the affordable housing offer in residential developments.

27 London Plan policy 3.12C states that affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of other policies of the London Plan, it may be provided off-site. A cash-in-lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies of the London Plan. Any payment should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or part of an agreed programme for the provision of affordable housing.

28 In this case, the applicant is not proposing to provide affordable housing on-site, but has offered a cash-in-lieu contribution. GLA officers accept the difficulties in providing separate residential cores on a complex block site like this, with retail and office uses on lower floors, which is further complicated with the need for servicing and the London Underground station, and this has been demonstrated through a technical exercise undertaken by the scheme architects.

29 The applicant has examined options for off-site delivery and has identified schemes where the Royal Borough of Kensington & Chelsea are looking to bring forward affordable housing on its own land. The applicant argues that affordable housing can be delivered more effectively and in a larger quantity off-site. This is accepted by GLA officers, in this instance.

30 A financial contribution of £12.1million is being offered by the applicant. GLA officers expect the Council to ensure this is the maximum sum which can be delivered. In particular it should be examined as to how the constraints of the site, such as the listed building and heritage issues, the presence of the London underground station etc. have been inputted into the toolkit and how this has impacted on the affordable housing offer. Both the applicant's viability report and the Council's analysis should be shared with the GLA with, or ideally before, any Stage 2 referral.

31 At Stage 2, any draft section 106 agreement should include a memorandum of understanding detailing how any commuted sum will be spent across the borough, including any identified schemes and demonstrating how the payment will be spent, ring-fenced and clearly further the provision of affordable housing, in line with London Plan policy 3.12C.

## Residential quality

32 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. The proposed units will exceed the standards set out within Table 3.3, with the exception of one 3-bed unit within the listed building which falls marginally short by 4sq.m. Given the constraints of the listed building, this is acceptable to GLA officers.

33 The applicant has sought to meet the guidance of the Mayor's Housing SPG, and GLA officers consider the development to provide high quality residential accommodation, with high quality amenity space. GLA officers would also note that the accommodation is much better than that which it is replacing.

#### Residential density

34 This site has a public transport accessibility level of 6B, and GLA officers have classified the setting as central in character. The London Plan density matrix (Table 3.2), therefore, suggests a residential density of between 650 to 1,100 habitable rooms per hectare for this scheme. The planning statement confirms that the density across the scheme as a whole is 597 habitable rooms per hectare. Whilst this falls below the ranges within the London Plan, it is acknowledged this site is not a wholly residential site and is providing a mix of uses commensurate with its CAZ location. GLA officers consider the density to be appropriate.

#### Children's play space

35 Based on the residential mix set out in table 2 above, and applying methodology within the Mayor's Play and Informal Recreation SPG, GLA officers have calculated an expected child yield for the scheme of 4, equating to an overall play space requirement of 37 sq.m. The SPG does not require developments with an estimated child yield of less than 10 children to provide play space on-site.

36 However, the submitted design and access statement sets out the proposed play strategy for the scheme, and demonstrates that the scheme would accommodate space available for children within the development which would include informal and interactive features such as stepping stones and a sandpit. The applicant highlights that there is high quality formal play equipment in Hyde Park and Belgrave Square.

37 Given the proximity to formal play equipment and the informal provision on-site, GLA officers would support the proposed play strategy in accordance with London Plan Policy 3.6 and the SPG.

### **Urban design and heritage**

38 Good design is central to all objectives of the London Plan (2015) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

#### Overview

39 Sections 66 and 72 of the Planning (Conservation Areas and Listed Buildings) Act 1990 requires the decision maker to have "special regard" to the desirability of preserving the listed building or its setting, and pay "special attention" to the desirability of preserving or enhancing the character or appearance of the conservation area. As noted earlier in this report, the site contains listed buildings and is located within a conservation area. In summary, whilst the development would cause less than substantial harm to the Hans Town Conservation Area, this harm, having paid special attention to the desirability of preserving or enhancing the character or appearance of

the Hans Town Conservation Area and giving the harm identified considerable importance and weight, is outweighed by the public benefit of the scheme. Likewise in respect of the listed buildings, whilst the development would cause less than substantial harm to the listed buildings, this harm, having had special regard to the desirability of preserving listed buildings or their setting and giving the harm identified considerable importance and weight, is outweighed by the public benefit of the scheme. Overall, GLA officers conclude that despite the strong presumption against granting planning permission and listed building consent, the harm identified is outweighed by the public benefits. The NPPF also states that substantial harm to listed buildings should be exceptional, and where less than substantial harm will be caused, the harm should be weighed against the public benefits of the proposal.

40 GLA officers are confident that the development proposals will have a positive overall impact on the character of the conservation area, and less than substantial harm would be caused, which would be significantly outweighed by the public benefits that would arise as a result of the mix of uses within the CAZ and improvements to the Underground station access.

41 The proposal to regenerate this prominent historic city block at the gateway to Knightsbridge is broadly welcome. All of the late Victorian and Edwardian buildings on the site make a positive contribution to the character of the Hans Town Conservation Area and the retention and restoration of their facades proposed as part of this scheme, including the reinstatement of missing architectural features, should preserve and enhance this conservation area.

42 The demolition behind the facades of all except parts of the Grade II Listed Building 4a/5 Sloane Street, will not have a significant impact upon the character or appearance of the conservation area given that it is a complete city block with no views into the core of the block from the public realm.

43 The relatively modest additions at roof level (mostly comprising a traditional double-height mansard) will not harm the townscape of this historic quarter or the character of this part of the conservation area, from a strategic perspective. The proposal to widen the footpath outside the relocated Knightsbridge Underground station is strongly supported.

#### Hooper's Court

44 The southern part of the scheme onto Hooper's Court has been the subject of pre-application discussions and whilst the two storey podium clad with ox-blood faience tiles by Leslie Green is to be retained and sensitively adapted to create a more active street frontage, the plain red brick upper elevations are now to be replaced with an innovative grid-design of deeply recessed punched windows and vitreous enamel cladding with a foliage imprint. The loss of the early 20th century red-brick elevations will result in less than substantial harm to the character of this part of the conservation area but on balance, a convincing justification has been made for replacing this element of the block's envelope with an imaginative new design above the retained 1900's Leslie Green frontage. The siting of the step-free entrance into the Underground station on this alley, and the respectful adaption of the Green screen to activate this currently dead-frontage should together greatly enhance the character of this narrow thoroughfare, and is welcomed.

#### Listed Building at 4a/5 Sloane Street

45 The applicant has sought to retain original fabric and historic plan-form and basement and ground floor by creating openings in the internal walls, rather than removing them. The reinstatement of the original plan form on the upper floors, retaining its residential use and restoring key features such as the staircase and stained glass windows to the rear, is also welcome, as is the reinstatement of the shopfront.



46 The external changes to the listed building are considered to be beneficial, with the removal of modern shopfronts and replacement with historical styles which reflect the design of the building. Internal changes to the building would see the basement and ground floor altered, with the removal of a party wall between 4 and 5a and openings within the internal walls related to the larger retail uses, resulting in the loss of some original fabric and original plan-form.

47 Overall, whilst the proposals would lead to some harm to the listed building, this is considered to be less than substantial given the enhancements to its street elevation, securing the long-term viability of the building and the wider benefits accruing from the development including enhanced public realm, new and enhanced underground accesses and the repair and restoration of the street elevations to the unlisted buildings on the site.

#### Knightsbridge underground station

48 Whilst the loss of the Portland stone ground/first floor facade to Knightsbridge underground station designed by the distinguished architect William Curtis Green in the early 1930s is regrettable and would result in less than substantial harm, GLA officers consider the restoration of the pre-1930 shop fronts to this Edwardian building and the reinstatement of the original cupola at the apex of the building, would, on balance, outweigh this loss.

49 The preservation of the historic 1930's roundel at first floor level on the existing Underground station frontage and its relocation on the bulkhead over the staircase within the new station entrance on Brompton Road is welcomed, as is the traditional projecting blue fascia canopy and javelin-style roundel. However, the finishing to the station portal on Hoopers Court should be in keeping with the oxblood / Leslie Green tiles elsewhere on Hoopers Court.

#### Roof additions

50 The proposed mansard roofscape and the traditional design of the new dormers has been the subject of detailed pre-application discussions. The proposals are considered to be an appropriate design response.

#### 33-35 Brompton Road

51 The incorporation of 33-35 Brompton Road into the development site and the replacement of the banal 1950's building with a scholarly replica of the building lost in the Blitz, is an entirely appropriate design solution and will significantly enhance this part of the conservation area.

### **Inclusive design and access**

#### Underground Station

52 The scheme includes an access to facilitate the provision of a new step-free access to Knightsbridge underground station, off Hooper's Court. This is highly welcomed and will help meet the strategic aim of improving access for all across London's transport network. Delivery of the step-free access should be secured through the s106 legal agreement.

#### Residential uses

53 As of 1 October 2015 the Government's technical housing standards came into effect. These standards required that 90% of homes to be built to meet building regulations M4 (2) 'accessible and adaptable dwellings' and 10% to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users to meet building regulation M4(3) 'wheelchair user dwellings'

54 The Mayor is intending to adopt this new technical guidance through the minor alteration to the London Plan (MALP). In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

55 As such, the Design & Access statement identifies that 4 of the 35 proposed units (11%) are designed to be regulation M4 (3), this is welcomed and should be secured by condition. It is noted that 3 of the 4 apartments located within the listed building at 4a/5 Sloane Street will not fully comply with M4 (2), and given the listed status of the building and the constraints this brings, this is accepted.

#### Retail and public realm

56 In accordance with London Plan Policy 7.2, the applicant has demonstrated that the principles of inclusive design have been incorporated throughout the scheme. The applicant's design team have worked hard to respond to the constraints of the retained facades and listed building and this is applauded. The provision of step-free access to Knightsbridge Underground station and the enlargement of the footpath outside the relocated underground entrance on Brompton Road is strongly supported.

### **Climate Change**

#### Energy

57 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery for the dwellings.

58 The applicant has stated that the retained facades limit opportunities for addressing overheating risk via passive means but has stated that the dwellings will be dual aspect allowing for cross ventilation. Further information should be provided on the performance of the dwellings with regards to overheating risk. The applicant should clarify if the dwellings will be provided with active cooling, if not, Part L compliance checklists for the dwellings should be provided to demonstrate that the risk of high temperatures in summer is slight or lower.

59 The development is estimated to achieve a reduction of 186 tonnes per annum (23%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development. The BRUKL sheet and a sample SAP have been provided to support the savings claimed. Further information should be provided on the design measures integrated in the non-domestic building design to achieve such high levels of carbon savings against the Part L baseline.

60 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

61 A site heat network is proposed; however the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. The site heat network will be supplied from a single energy centre. This will be approximately 450sq.m in size and located within the basement.

62 The applicant is proposing to install a 40kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO2 emissions of 98 tonnes per annum (12%) is claimed through this second part of the energy hierarchy. The savings appear high for the engine size proposed. Larger versions of the heat profiles graphs should be provided as the numbers are not readable. Information should also be provided on the expected running hours and the proposed long term management arrangements for the system.

63 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. It is accepted that opportunities for the integration of photovoltaics on the roof are very limited.

64 Based on the energy assessment submitted, a reduction of 284 tonnes of CO2 per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 36%.

65 The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however, the comments above should be addressed before compliance with London Plan energy policy can be verified.

#### Climate change adaptation

66 The Flood Risk Assessment prepared by Waterman confirms that this <1ha site is in Flood Zone 1 and is not at risk from significant surface water flooding. However, the site is located within the Reservoir Flood Zone (if the Serpentine dam were breached or overtopped). Whilst this scenario may be unlikely, the applicant should consider how utility services can be maintained operational during a flood, for example by placing vital services, such as electricity supplies, lift power and control gear, in flood-proof enclosures.

67 The Drainage Management Plan prepared by Waterman proposes a 50% reduction of the existing peak flow rate to 20.6 l/s for the 1 in 100 year storm (plus climate change), via a 128m3 underground geocellular tank.

68 It is also proposed to include a courtyard at second floor level, together with roof gardens and terraces. The courtyard will include a green wall, a rill with associated planting, reflecting pools and a water feature. The applicant should consider how to maximise the stormwater attenuation potential of these proposed water features, rather than relying on mains water supply.

### **Air Quality**

69 The site is within an Air Quality Management Area (AQMA) and the applicant has submitted an Air Quality Assessment (AQA) which is currently being reviewed by GLA officers. An update will be provided at Stage 2.

### **Green Infrastructure**

70 London Plan policy 5.10 seeks to increase the amount of surface area greened within the CAZ by at least 5% by 2030. The landscaping proposals within the courtyard including green walls and planting are welcome and should be secured via an appropriate planning condition.

71 The Design and Access Statement prepared by Fletcher Priest Architects proposes that residents will use the nearby Hyde Park for recreational use. The Ecological Appraisal prepared

by Waterman proposes the creation of nesting opportunities for breeding birds, for example via Schwegler bird boxes / bricks. These should be considered for inclusion by the applicant.

## **Transport**

### Knightsbridge Station

72 The application proposes to relocate an entrance into Knightsbridge station as well as facilitating step free access into the station via Hoopers Court. The development will also make provision for future capacity upgrades on the Piccadilly line through the provision of cooling equipment on the roof of the development. London Underground (LU) has been working with the applicant to agree a proposal which is acceptable in terms of impact upon the existing transport infrastructure and also safeguards the future operation of the Piccadilly Line and Knightsbridge Station.

73 LU is generally supportive of the proposed scheme however suitable provisions must be incorporated into any consent to ensure that LU has the ability to deliver the works to create step free access and improved cooling at Knightsbridge Station to coincide with the completion of the development. Other provisions to ensure the railway infrastructure is safeguarded throughout any works and to ensure the operation of the railway is maintained will be incorporated into LU's detailed response to the planning authority.

### Public realm

74 Pedestrian access to the site will be taken from a number of points from Brompton Road, Sloane Street, Basil Street and Hoopers Court. To facilitate this the application proposes a number of changes to the highway layout including footway widening on Brompton Road and Sloane Street and changes to crossings over Brompton Street both immediately outside the site and at Knightsbridge Green a short distance to the west. The changes to the Brompton Road / Sloane Street junction deliver an improved environment for pedestrians and fit in with wider TfL aspirations for the area although some further work is required to reach agreement on the changes to the pedestrian crossing at Knightsbridge Green. Any highway changes agreed through this application on Brompton Road would need to be delivered through a Section 278 agreement and this would need to be secured through an appropriate condition or planning obligation on any consent.

### Trip Generation

75 Trip generation figures are agreed and it is acknowledged that the additional trips generated as a result of the development will not result in an unacceptable impact on the local transport network.

### Car Parking

76 It is proposed to provide 24 car parking spaces for the 35 residential units, at a ratio of 0.7 spaces per unit. Two of these spaces would be provided for blue badge users, with a further blue badge space provided for the commercial uses on site. Given the excellent public transport accessibility of this location, TfL feel that the site is suitable for a car free development. However, given the improvements proposed to Knightsbridge station as part of the development, it is acknowledged that the proposals would offer substantial benefits towards the use of more efficient forms of transport other than the private car. However, within any parking provision electric vehicle charging points will need to be provided in accordance with London Plan standards.

### Cycle Parking

77 Cycle parking is proposed at basement level, with 310 spaces provided as a mixture of two-tiered parking and Sheffield stands. This cycle parking will also be accessible to the public as short stay parking. Whilst providing public parking at basement level is not ideal, it is accepted that the constraints of the site make providing it within the public realm difficult, and the level of provision is in excess of the minimum standards set out in the London Plan. As such, this provision, along with the provision of showers, changing rooms and lockers for employees, is supported.

### Deliveries & Servicing

78 Servicing is predominantly to take place at basement level. The provision of off-street servicing is supported by TfL, and although it is acknowledged that larger service vehicles will need to continue to service on street from Basil Street it is accepted that the development should result in an overall reduction in the amount of servicing taking place on street. To formalise the servicing regime a Delivery and Servicing Plan (DSP) has been submitted with the application and TfL would request that is secured by condition on any consent.

### Travel Plans

79 A residential Travel Plan statement and a workplace Travel Plan have been submitted with the application and should be secured on any consent for the site. Both documents are well considered and of a good quality.

### Construction Management

80 A Construction Management Plan has also been submitted with the application, which shows a construction access proposed on Brompton Road. In principle this arrangement is acceptable, but there will need to be some further discussion on management, timings and routings of construction vehicles. As a result, a condition requiring submission of a detailed Construction Logistics Plan prior to works commencing on site should be secured on any consent, in line with London Plan policy 6.3.

## **Community Infrastructure Levy**

81 In accordance with London Plan Policy 8.3 the Mayor commenced CIL charging for developments on 1 April 2012. Within Royal Borough of Kensington & Chelsea, the charge is £50 per square metre. This site is also within an area where Section 106 contributions for Crossrail are sought in accordance with London Plan Policy 6.5 and the associated "Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG" (April 2013). In these situations, the Mayoral CIL is to be treated as a credit towards the section 106 Crossrail liability, and this should be reflected in the wording of the Section 106 agreement.

## **Local planning authority's position**

82 Royal Borough of Kensington & Chelsea is expected to take the application to a Planning Committee in April or May.

## **Legal considerations**

83 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

84 There are no financial considerations at this stage.

## Conclusion

85 London Plan policies on Central Activities Zone, retail, housing, urban design and heritage, inclusive access, climate change, green infrastructure, air quality and transport are relevant to this application. Whilst the scheme is strongly supported in principle, the application does not fully comply with the London Plan where flagged below:

- **Principle of development:** The proposed development for an enhanced mix of uses within the CAZ is strongly supported, in line with London Plan policies 2.1, 2.10 and 2.11.
- **Retail:** The proposal for an increased quality and quantity for retail floorspace within the International Retail Centre is strongly supported in line with London Plan policies 2.10, 2.11 and 2.15.
- **Housing:** The proposal for uplift in residential units is welcomed in line with London Plan policy 3.3. Whilst no objection is raised to the proposed provision of affordable housing off-site given the physical constraints of this site and the central location, the Council should ensure that the commuted sum for off-site provision offered is the maximum reasonable amount and provide details as to where this money will be spent within the borough ( and how it will demonstrably deliver more affordable housing) with a memorandum of understanding appended to the section 106 legal agreement, in order to to meet London Plan policy 3.12 C.
- **Urban design and heritage:** The design of the scheme is strongly supported and the applicant should be commended for working with stakeholders at pre-application stage to propose a high-quality and sensitively designed scheme. Accordingly the design is supported in accordance with London Plan Policy 7.1.
- **Inclusive access:** The proposed approach to access and inclusion is supported in accordance with London Plan Policy 7.2
- **Climate Change:** The current proposed energy strategy meets London Plan Policy 5.2 but those further details requested should be provided ahead of Stage 2 to verify the proposed strategy. Opportunities for stormwater attenuation within the proposed water features within the landscaping should be explored.
- **Green Infrastructure:** The landscaping proposals will enhance urban greening within the CAZ and are supported. Opportunities to enhance biodiversity such as bird boxes should be considered.

- **Transport:** Whilst the proposal is broadly acceptable in strategic transport terms, the applicant should address the matters raised in this report with respect to any highway changes for the public realm, electric vehicle car charging, deliveries & servicing and construction logistics to ensure accordance with London Plan policies 6.3, 6.9, 6.10, 6.11, 6.13 and 6.14.

The resolution of the above matters could lead to the application becoming acceptable in strategic planning terms.

---

for further information, contact GLA Planning Unit (Development & Projects Team):

**Colin Wilson, Senior Manager – Development & Projects**

020 7983 4783 email [colin.wilson@london.gov.uk](mailto:colin.wilson@london.gov.uk)

**Justin Carr, Strategic Planning Manager (Development Decisions)**

020 7983 4895 email [justin.carr@london.gov.uk](mailto:justin.carr@london.gov.uk)

**Jon Sheldon, Senior Strategic Planner (Case Officer)**

020 7983 5852 email [jon.sheldon@london.gov.uk](mailto:jon.sheldon@london.gov.uk)

---