

Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Section 9: Rail infrastructure

Issue 1: The Council needs to ensure that the Borough is not left behind as public transport links across London and the capital improve. What policies should the Council adopt to ensure that the future needs of our residents, businesses and visitors are met?

Question: How should the Council address this issue?

Option 1: The Council should continue to encourage new and enhanced rail infrastructure, particularly in poorly connected areas.

Option 2: The Council should seek alternatives to rail-based improvements to address public transport deficiencies in the Borough.

Name	Comment	Selected Option	Council's Response
1 Charles Bezoari Elder		2	The Council considers that seeking enhanced rail infrastructure should be a priority for the Local Plan.
1. Charles Bezoari Elder	High st. Kensington station is unsafe, overcrowded, and not fit for purpose. And why does TfL continue to have Holland Park in zone 2? Holland Park is far closer to Westminster than most of the tube stations far east on the District/Central lines which are in Zone 1, yet it is Zone 2- makes no sense whatsoever, and the council should be pushing TfL to change HP to Zone 1.	0	High Street Kensington station comments noted. The tube station zoning is long standing and was developed by TfL as a fares indication as much as anything. The current zoning arrangements are supported.
2 J Hernandez		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
3 Federico Ghella		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
4 Norland Society (Clive Wilson)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
5 Sonia Richardson	We must have Crossrail 2 in the borough	0	The Council strongly supports a new Crossrail 2 station in Chelsea.
5 Sonia Richardson	Crossrail 2 is strategic-I absolutely believe that we must have a Crossrail 2 station in Chelsea-we will be left behind commercially if we don't. I am less worried about where it is situated than about losing the opportunity to have a station		The Council strongly supports a new Crossrail 2 station in Chelsea.
Sonia Richardson		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
6 J Neville		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.

Name	Comment	Selected Option	Council's Response
7 Roy Burns	These two options are not mutually exclusive. as an advocate of CrossRail2, I would also support improvements to non-rail transport systems.	0	Noted. The Council strongly supports a new Crossrail 2 station in Chelsea.
8 Victoria and Albert Museum (Steve Hyde)	<p>The V&A considers that the Council should encourage new and enhanced rail infrastructure - both by working with TfL and Network Rail - given that the provision of enhanced rail infrastructure is vitality important for increasing visits to the V&A and the South Kensington Strategic Cultural Quarter.</p> <p>The V&A also supports other public transport improvements to its site by enhanced buses to Cromwell Road - and enhanced public realm measures to improve pedestrian access to the V&A from bus and rail interchanges to be delivered by TfL/RBKC, in association with other stakeholders.</p>	0	Noted. The Council strongly supports a new Crossrail 2 station in Chelsea. The Council will continue to work with TfL and the Museums for public transport improvements in the area.
Victoria and Albert Museum (Steve Hyde)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
9 Exhibition Road Cultural Group (Emily Candler)	<p>Improving access to South Kensington should be a priority for rail infrastructure investment. In particular, priority should be given to much needed work to improve South Kensington station, including congestion relief and step-free access throughout, improved wayfinding and upgrade of the fabric of the whole station including pedestrian tunnel.</p> <p>New transport links, such as Crossrail 2 stop at King's Road, that make it easier to reach South Kensington, and extend the area within commuting distance are essential for South Kensington to continue to thrive and should be strongly encouraged.</p> <p>The Council should promote other public transport improvements to South Kensington and further improvements to public realm to improve pedestrian access.</p>	0	<p>The Council has been in extensive discussions with TfL regarding improved station facilities at South Kensington including step free access and applications for planning permission and listed building consent are expected soon.</p> <p>The Council strongly supports a new Crossrail 2 station in Chelsea. The Council will continue to work with TfL and the Museums for public transport improvements in the area.</p>
Exhibition Road Cultural Group (Emily Candler)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
10 Jo Poole	More buses in North Kensington that run east/west.		Noted.
Jo Poole		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
Jo Poole		2	The Council considers that seeking enhanced rail infrastructure should be a priority for the Local Plan.
11 Cheyne Walk Trust (David Waddell)	<p>Section 9 Rail Infrastructure Q1.</p> <p>The Council should continue to encourage new and enhanced rail infrastructure in poorly connected areas. To that end the Council should maintain its extant policy on a possible Crossrail 2 station in the Imperial Wharf/Lots Rd area as stated at Para 9.5.19 and delete the revised policy at Para 9.14.16 which states that the possibility of a CR2 Station in the Imperial Wharf/Lots Rd area has been eliminated on engineering and cost grounds. In the light of the recent correspondence between Greg Hands MP Chief Secretary of HMT and the Mayor for London and further correspondence with the CE of TFL requesting a full review of that option, it has not yet been categorically eliminated. Furthermore, it is understood that Councillors of the LBHF have joined in a bi-party motion supporting the demand of Greg Hands MP that the Imperial Wharf/Lots Rd location be fully re-evaluated under the current TFL CR2 Consultation.</p>		The Council strongly supports a new Crossrail 2 station in Chelsea, but at the junction of King's Road and Sydney Street as this is considered to be a much more central location that will benefit the whole of Chelsea including the western end (Lots Road) area. The Imperial Wharf option has been extensively explored by LBHF but it

Name	Comment	Selected Option	Council's Response
			is understood that there may be engineering difficulties with this location and it has not been included on the TfL list of possible station locations.
Cheyne Walk Trust (David Waddell)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
12 Sainsbury's Supermarkets Ltd (Indigo Planning)	Sainsbury's fully support the provision of the Kensal Portobello Crossrail Station. However, as stated above, it is important that policy is worded to allow the development of the site to come forward independent of the station. This will also help to ensure the deliverability of the site should the station not be provided.		Noted. A Development Infrastructure Funding Study (DIF) has been undertaken to ensure that all infrastructure permutations are considered and this includes developing the Kensal site without a station.
13 Christie's South Kensington (Francesca Filippini Pinto)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
14 Christian Durie		2	The Council considers that seeking enhanced rail infrastructure should be a priority for the Local Plan.
Christian Durie	Crossrail2 - as it only connects Victoria to Clapham Junction is not needed. There are already good connections. Nor would it help enhance the character of Chelsea.		The Council disagrees with this view as a station would bring distinct accessibility advantages, especially for the western end of Chelsea. It is not clear how the character of Chelsea would not be enhanced. Existing townscape should not be harmed and improving accessibility and footfall can only be viewed as a positive move.
15 Kerry Davis-Head	Bus improvements. River improvements. Enhancing existing rail services.		Noted.
Kerry Davis-Head		2	The Council considers that seeking enhanced rail infrastructure should be a priority for the Local Plan.
16 Austin Mackie Associates Limited (Private Clients)	... but so far as possible, enhanced connectivity should not be at the cost of the character, quality or amenity of established residential areas		It is not clear how the character of Chelsea would not be enhanced. Existing townscape should not be harmed and improving accessibility and footfall can only be viewed as a positive move. If there is concern that a Crossrail station may bring more visitors to Chelsea and accessibility to the hospitals will be

Name	Comment	Selected Option	Council's Response
			improved these are viewed by the Council as positive outcomes.
Austin Mackie Associates Limited (Private Clients)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
17 Catalyst Housing (Martyn Freeman)	New and enhanced rail infrastructure will significantly improve connectivity and public transport accessibility in the north of the Borough.		Noted
Catalyst Housing (Martyn Freeman)		1	Policy CT2 continues to encourage new and enhanced rail infrastructure.
19 Barton Willmore (Paul Newton)	<p>Issue 1 (Public Transport Links)</p> <p>21. As set out in respect of Chapters 2 & 4 above, we fully support the proposed Kensal Portobello Crossrail Station. However, given the need to deliver new housing in the Borough as a priority and the importance of the Site in this respect, it is imperative that the development of the Site is not dependent on delivery of the Station and the Policy worded to ensure that it can still come forward should the Station not proceed.</p> <p>22. Clarity is also requested over the timescale for resolution of this matter and, subject to this, the Plan to be worded accordingly in order that it provides a clear framework.</p>		Noted. A Development Infrastructure Funding Study (DIF) has been undertaken to ensure that all infrastructure permutations are considered and this includes developing the Kensal site without a station. As part of this work and for the strategic site allocation the timescale for delivery will be resolved.
20 Kensington Society (Michael Bach)	<p>Section 9: Rail infrastructure</p> <p>The Society strongly supports the use of PTALs, although they have not been adjusted for barriers, such as railway lines, canals, parks, major roads (eg Cromwell Road). TfL's proposal to present them as 100m squares is a backward step.</p> <p>Assessing the impact of new stations needs to be realistic – their impact will be on area covered by 10-minute actual walking distance and will depend on the frequency and capacity of the service.</p> <p>Issue 1: The Council needs to ensure that the Borough is not left behind as public transport links across London and the capital improve. What policies should the Council adopt to ensure that the future needs of our residents, businesses and visitors are met?</p> <p>Option 1 The Council should continue to encourage new and enhanced rail infrastructure, particularly in poorly connected areas. The Society supports Policy CT2 (b) and (e) – not (a), (c) and (d)</p> <p>Option 2 The Council should seek alternatives to rail-based improvements to address public transport deficiencies in the Borough. The Society also supports improved bus services</p>		Noted. The policies are as stated – support for a new Crossrail station at Kensal as part of Crossrail 1 and a new station in Chelsea as part of Crossrail 2. The Council is doing everything it can to ensure that we are not left behind in relation to transport improvements. The Better Travel Choices addresses this concern. The response to Option 1 is noted. The Council finds it surprising that the Kensington Society does not support a new Crossrail station at Kensal, nor it would appear a Crossrail station in Chelsea. Support for improved bus services is noted.
21 London Borough of Hammersmith and Fulham (Trevor Harvey)	On the "rail infrastructure" section, we are not sure what RBKC is proposing to change, or why, but in regarding existing policy, CT2, we support d) promotion of a possible Crossrail 2 station at Imperial Wharf, so would not want that taken out, and on b) West London Line station at North Pole Road, we are not opposed in principle to this but it is not a priority for us; If RBKC commission some studies, we will co-operate as far as reasonably practicable.		Noted.
22 TfL (Lee Campbell)	<p>Rail Infrastructure</p> <p>TfL is continuously looking for new funding sources to bridge the gap created by public subsidy cuts and the need to reinvest into and improve infrastructure to keep a growing London moving.</p> <p>TfL owns around 5,700 acres of land across London, including buildings, land attached to tube stations, railways and highways. TfL is taking an increasingly commercial approach to its assets to deliver investment back into the transport network. This includes the development of vacant or underutilised sites to generate income and deliver new homes and town centre uses. Income from redeveloping assets, in accordance with</p>		Noted, particularly in relation to South Kensington station.

Name	Comment	Selected Option	Council's Response
	<p>the TfL Business Plan, will help to deliver Tube upgrades and modernisation of London's road network. It is TfL's intention to enter into partnerships with developers to deliver schemes across London. TfL confirmed the selection of 13 development partners in February 2016.</p> <p>The Around Station Development site is identified as a development opportunity by TfL and a detailed feasibility study is currently being undertaken in consultation with local stakeholders. This forms the basis of TfL's request that the site is considered for a Site Allocation. All TfL proceeds from the development will be used to deliver investment back into the transport network.</p> <p>Summary TfL would appreciate the above points to be taken into account in the next version of the draft plan. We would also welcome the opportunity to provide further input into the drafting of any relevant policies.</p>		
23 Judith Blakeman	<p>Latimer/Westway The Council should reject TfL's "confirmation" that a station at Westway Circus on the West London railway line is not feasible. It is not infeasible and several studies have demonstrated that. The Notting Dale and St. Helen's wards are particularly badly served by public transport.</p> <p>The Council should therefore continue (as with the TfL-rejected Kensal Portobello Crossrail station) to press for a Westway Circus station linked to the HS2 Crossrail station at Old Oak Common. The Imperial West Innovation Hub, the More West development and the possible regeneration of the Silchester area all indicate a much larger future residential community, with a greater need for a better range of local public transport options.</p> <p>Kensal Portobello Crossrail station We believe that the Council's campaign for a Kensal Portobello Crossrail station is a limited ambition. The Council should be seeking to improve access to public transport for all parts of North Kensington, (including of course Westway Circus).</p> <p>Should the case for Kensal Portobello ultimately fail, the Council should also keep open the Plan B option of a tram or rail link between Kensal Ladbrooke Grove and the HS2 Crossrail station at Old Oak Common. Both this and a Westway Circus station will significantly enhance access to public transport for many more North Kensington residents.</p>		Support for a station at this location is given in the St. Quintin and Woodlands Neighbourhood which is part of the Development Plan for the borough. The Council has not objected to this aspect of the Plan. This is considered to give sufficient support for such a proposal. If a station is not secured at Kensal then other options will be explored such as an enhanced bus service, but these are considered insufficient in themselves to optimise development on the site.
24 Cllr E Dent Coad	We welcome improvements to transport and accessibility, including step-free access, but this must be done in an intelligent way that brings better travel options to the areas currently deficient. Relying on development to pay for it will not bring improvements where most needed.		Noted.
25 The Chelsea Society (Michael Stephen)	<p>RAIL INFRASTRUCTURE The most important issue is Crossrail 2, which has already been dealt with.</p> <p>In addition, there is an urgent need to provide step-free access to both platforms at Sloane Square station. TfL should also restore the distinctive green trellis tiles on the platform walls.</p>		This is a matter for TfL not the Council.
26 St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	<p>Section 9 Rail Infrastructure 9.1 As stated at 9.3.7 of the Partial Review document, the StQW Neighbourhood Plan correctly identifies parts of the North Kensington as suffering from poor public transport accessibility. The Plan proposes that a new station on the Overground network be positioned near the underpass link to Imperial West (a location named by the West London Line Group as 'Westway Circus'). 9.2 The StQW Forum welcomes the Council's continued support for this aspiration, but as the Partial Review document states <i>TfL 'has confirmed that a station near North Pole Road or Westway Circus is not feasible and cannot come forward at present'</i>. 9.3 No reasoned view of this statement by TfL has yet been provided. The proposed new Overground station on the West London Line at Hythe Road is too far away to benefit residents in the St Quintin, Westway, or currently named 'Latimer' areas. It will not improve poor PTAL levels in this part of North Kensington. Given that station spacings on the East London Line are now much closer together in the past, it is not clear why an additional station at Westway Circus is deemed to be 'not feasible' particularly given the scale of development already under construction in the surrounding area (Imperial West, Stanhope/ BBC scheme). Issue 1 Option 1 The Council should continue to encourage new and enhanced rail infrastructure, particularly in poorly connected areas. Yes, the Council should continue to press for an additional station as per current policy CT2 b, while varying the location from North Pole Road to 'Westway Circus' in order to exploit the benefit provided by the Imperial West S106 commitment to construct an pedestrian/cycle underpass at the former location. Option 2</p>		Support for a station at this location is given in the St. Quintin and Woodlands Neighbourhood which is part of the Development Plan for the borough. Reference to a station at this location has been included in CT2(b).

Name	Comment	Selected Option	Council's Response
	The Council should seek alternatives to rail-based improvements to address public transport deficiencies in the Borough. The StQW Forum concurs with the Council's view that bus-based alternatives to improved rail infrastructure will be insufficient.		

Issue 2: West Brompton station

Option 1: The Council should retain this specific reference to West Brompton station within the policy.

Option 2: The Council should seek step-free access at all its stations as per Policy CT1 and move references to West Brompton into the revised site allocation for Earl's Court.

Name	Comment	Selected Option	Council's Response
1 Charles Bezoari Elder		2	Existing Local Plan Policy CT1(k) (which is not part of the scope of the Local Plan Partial Review) already seeks "to ensure that step-free access is delivered at all Underground and rail stations by 2028". The reference to West Brompton has been moved to the Earl's Court site allocation policy.
2 Sonia Richardson		2	See above
3 Roy Burns		2	See above
4 Jo Poole		2	See above
5 Cheyne Walk Trust (David Waddell)	see comment above at Issue 1		See above
6 Austin Mackie Associates Limited (Private Clients)		2	See above
7 Kensington Society (Michael Bach)	The Society strongly supports Policy CT2 (e)		See above
8 Kensington Society (Michael Bach)		1	See above
9 Cllr E Dent Coad		2	See above

Question: Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

Name	Comment	Council's Response
1 Constant Touch Network (Piers Thompson)	I would like to know the details of the new transport links you require. We are served by the 7, 295 and 316 buses. The Hammersmith & City line takes you to Ladbroke Grove and beyond to Baker St, Kings Cross and Liverpool St, or to Shepherds Bush and Hammersmith in the other direction. Beneath the Westway lies an excellent cycleway. You can find the original street plan of the area on the We Love Silchester Estate FB page. You will find it far more confusing than today's and may be amused by the irony of the fact that it was torn up because it was thought to be contributing to the 'deep rooted criminality of the notorious Notting Dale slums'. To get from here to Ladbroke Grove, you either go along Silchester Road, or you take the walkway past the Leisure Centre, and then take Blenheim Crescent.	Noted. New transport links are yet to be defined over and above a new Crossrail station at Kensal with associated link from the site to Scrubs Lane, probably for buses only.

Name	Comment	Council's Response
2 Christie's South Kensington (Francesca Filippini Pinto)	<p>Improving access to South Kensington should be a priority for rail infrastructure investment. In particular, priority should be given to much needed work to improve South Kensington station, including congestion relief and step-free access throughout, improved wayfinding and upgrade of the fabric of the whole station including pedestrian tunnel.</p> <p>New transport links, such as Crossrail 2 stop at King's Road, that make it easier to reach South Kensington, and extend the area within commuting distance are essential for South Kensington to continue to thrive and should be strongly encouraged.</p>	Noted. The Council supports a new station at King's Road as part of Crossrail 2.
3 Brompton Association (Sophie Blain)	<p>TfL have kindly shared with local associations their letter to you of August 27th in which they request pre-planning advice and seek to understand the requirements for an application for listed building consent. Whilst the outline proposals which we have been shown recently represent a significant improvement on all previous schemes, there are nonetheless some serious concerns which we want to share with you and conservation team now in the hope that proper consideration can be given to the importance of protecting historic fabric and the character of the area.</p> <p>South Kensington Underground Station is not only important because it is listed but because it is the gateway to the most important concentration of cultural institutions in Western Europe. The nearest analogue is Museum Island in Berlin. TfL claim that their new proposals are "conservation led" and "in keeping with the local area". However, it is not clear to us what conservation advice TfL has sought in developing its present development proposals. Apart from the capacity upgrade works they appear to us to be essentially development led. Outline advice is being sought on three areas proposed for redevelopment on the basis of a sketch scheme produced two years ago by architects Buckley Gray Yeoman which we advised TfL at the time was not sympathetic to the listed station and associated buildings.</p> <p>As you know, the Brompton Association was instrumental in getting the tube station listed in 2004. The list description issued at the time (when a major redevelopment was still being advanced) was framed in such a way as to focus on the early revetment walls, the George Sherrin arcade and, in terms of the Conservation Area, the ox-blood façade of the former entrance to the Piccadilly Line. To look at the station in this way suggests it is simply a kit of parts rather than an important example of a London Underground station that has had a multi-period and extremely interesting design history. The station needs to be considered as an integral whole.</p> <p>THE BOOKING HALL The top lit Booking Hall was also designed by George Sherrin and should be regarded as architecturally integral to the arcade and thus very much part of the listed station.</p> <p>We understand that TfL are now planning to retain the existing Booking Hall together with its columns and attractive roof. However, their letter to you makes no mention of this. We consider it imperative that RBKC makes it clear to TfL that the Booking Hall is an integral part of the listed station linking the arcade to the separately listed Museum Tunnel.</p> <p>We have consistently argued that it is perfectly feasible to retain the Booking Hall and extend the deck on which it sits to allow capacity upgrade. The sketch proposals we have seen recently indicate that this is what TfL is now proposing - whereas the Buckley Gray Yeoman proposals of two years ago showed the Sherrin Booking Hall completely swept away.</p> <p>The new capacity upgrade proposal to open up the northern platform to the District and Circle Line seems eminently sensible as do the plans, as part of this upgrade, to provide lifts/step-free access to both this new extended platform and the existing central platform (which will be used for westbound trains only). However, we consider the idea that only the lift shafts be constructed as part of the capacity upgrade works with the lifts themselves to follow at some later date to be unacceptable. It is essential that these two lifts are included as part of the present capacity upgrade works. Installing these lifts as an integral part of improving capacity along with the provision of the additional platform and extended booking hall will greatly assist the overall project's acceptance by residents, the institutions and commercial interests and mitigate the inconvenience and hardship caused by the suspension of the Piccadilly Line at the station for more than a year. It will also help rebut the belief, held by many residents, that step free access is not a priority for TfL at South Kensington.</p> <p>In the past, TfL has sought to link the provision of step-free access (a fundamental requirement) with enhanced development opportunity. We have consistently argued that this approach is not acceptable.</p> <p>THE REVETMENT WALLS Clearly, a new canopy is going to be required to cover the new northern platform. Given the listed status of the walls which date from the original construction of the tube station in the 1860s, this will need to be designed with great sensitivity. The sketch proposal we were shown recently (with what appeared to be an iron girder running crudely across the arcaded brick work) fell far short of design quality, skill and need for sensitivity required.</p>	Comments are noted, but they relate to a forthcoming planning application for the station and accompanying application for listed building consent. They are not addressed as part of the Local Plan Partial Review.

Name	Comment	Council's Response
	<p>THE ARCADE This is one of the glories of South Kensington Underground Station and it needs to be properly, accurately and sympathetically restored. RBKC need to insist on this. The idea that the arcade can be raised a storey (as the Buckley Gray Yeoman sketches illustrated two years ago) is not acceptable. The arcade would lose its authenticity and its proportions. It would be turned from an attractively scaled arcade into a tall, funnel-like galleria. Sherrin's original design would be irretrievably compromised and spoiled.</p> <p>Secondly, it is essential in our view that RBKC insists on the missing shop fronts being properly reinstated, thus enhancing the historic character and attractiveness of the arcade. The quality of George Sherrin's original bronze detailed shop fronts can be seen in the one complete remaining example – the former Anglo Persian Carpet Company, now a chemist's shop. This shop front also retains its curved glass elements as well. The other surviving shop front (partly in bronze, partly timber) is at the north east corner of the arcade. Parts of other original shop fronts survive at both ends of the arcade together with a wealth of attractive historic detailing including light fittings and bronze panels for notices.</p> <p>Again, we have been told by TfL there is an ambition to restore the missing shopfronts but the letter of August 27th does not refer to this. Under "Retail Upgrade" it states "Update the facades within arcade". The phrase "update" we find particularly worrying. Modern shopfronts in the arcade would be inappropriate and the removal of Sherrin's surviving original work would be wholly unacceptable.</p> <p>THE STRUCTURAL CONDITION OF THE ARCADE Even more worrying is TfL's current approach to the repair and conservation of the arcade. We were told at our meeting with TfL on 9th September that there were structural problems with the roof of the arcade which were causing the roof to lean and that the arcade would soon be scaffolded. This is the first time we have been advised of fabric concerns with the structure of the arcade so we asked for a copy of the condition report.</p> <p>We were sent the engineer's report prepared by RDG Engineering (see attached). It is very evident from this that the whole arcade roof is not leaning and that the issue identified relates to the brick gable ends. The report itself is entitled "Structural Survey Report – Gable Ends". It was carried out in January this year but has only been mentioned now as development proposals are advanced.</p> <p>The report indicates that there is a minor lean on one of the brick gable end to the arcade and a less obvious lean at the other end. Despite this, we have been advised by the firm advising TfL on public consultation that the entire arcade is to be scaffolded to provide a crash deck in the event of falling masonry. This begs the question: if the arcade was viewed as dangerous in January, why was it not scaffolded then? We have asked for a schedule of repairs and have been told that none exists and that "repairs will follow at a later date". This means that TfL is going to spend a substantial sum scaffolding the arcade for an unspecified length of time. This will be both unsightly and inconvenient for those using the arcade.</p> <p>Scaffolding is likely to give the impression to the public that the roof of the arcade is somehow in a dangerous condition. This strikes us as precisely the kind of scare tactic developers often use when seeking to advance a development – is the existence of the scaffolding going to be used by TfL/its yet to be appointed development partner to argue the case for adding a storey to the arcade to facilitate a larger development on top of the Bullnose?</p> <p>We note that RDG Engineering, whilst experts in a number of fields (including complex scaffolding structures), are not known for their expertise in the repair historic buildings. RDG Engineering have worked with conservation architects and conservation engineers on a number of major listed structures providing scaffolding access but they have not been involved in the actual conservation and repair projects directly so far as we are aware.</p> <p>We therefore asked Ed Morton of the Morton Partnership Ltd to look at the RDG survey regarding the roof of the arcade at South Kensington Underground Station. Ed Morton, as you probably know, is a highly regarded conservation engineer who advises on many of this country's most important historic buildings including major cathedrals and country houses. His clients include the National Trust, English Heritage and the Church of England.</p> <p>Ed Morton considers that detailed assessment of the wall and the supporting structure and the associated internal lining or structure is required. He advises that this more detailed assessment can establish the out of plumb (by measurement) of the gables and then the construction internally to see if the purlins provide lateral support to the gable walls, and what the support structure is below the gables. He advises that some monitoring could be considered to see if further lateral movement of the walls is occurring using electronic tilt meters. From this information he suggests a more informed view will be possible to see if additional support works are necessary or not. A more detailed assessment will inform the methodology for repair.</p>	

Name	Comment	Council's Response
	<p>We will be taking this matter up with TfL but felt that both you and your team in both planning and conservation should be aware of our concern that more may be being made of structural issues in the roof of the arcade than may be justified with a view to encouraging a higher quantum of development. We trust your conservation staff will encourage TfL to engage expert conservation advice on this matter.</p> <p>BULLNOSE We assume that this part of the site was developed at the same time as George Sherrin designed the arcade and booking hall. Although much altered, it may well have been designed by Sherrin. Whilst not opposed in principle to the addition of a storey (a single storey is, we know from previous correspondence with TfL, all the structural deck above the tracks below can support), we do not consider that any additional storey should interfere with the original design of the arcade (as mentioned above). The small shops which currently occupy the site are separated by pilasters set on bases and have a cornice above (though this is missing in various places). This cornice originally ran around the curve of the site from the northern tube entrance to that to the south. In order to protect and enhance the Conservation Area we consider that the Council should insist on these pilasters being retained and the cornice reinstated. Research needs to be carried out to find out how the original shop fronts were designed.</p> <p>In considering any development proposals for the Bullnose, it is imperative that the key view from Onslow Square towards the twin towers of the Natural History Museum is properly considered and not compromised.</p> <p>THURLOE STREET BLOCK We are deeply concerned that TfL continues to advance a case for demolishing this block and redeveloping the site behind a retained façade. This proposal has been advanced before at a time when TfL was proposing a massive development on top of the booking hall (vis the John McAslan scheme). Demolishing the Thurloe Street block was seen as a key to gaining access to the site for this major redevelopment. With the proposal now to retain the Sherrin Booking Hall as part of the capacity upgrade works this argument no longer holds good. Also, the Council needs to be aware that some years ago English Heritage made the point that this block makes a positive contribution to the character of the Conservation Area and urged its retention. We see no sound reason why this block should be demolished in its entirety and we urge you to resist this.</p> <p>It is currently being argued that this block needs to be demolished in order to achieve a disabled ramp into the Museum Tunnel and a lift to Thurloe Street. It is being argued that the steel beam supporting the entrance to the Tunnel is at the wrong height and thus is preventing a disabled ramp being constructed to the correct gradient. We are not convinced that the entire terrace needs to be demolished in order to construct the ramp and the lift, much needed improvements though they are. The lift is illustrated in the present proposals as rising up into Thurloe Street at the western end of the terrace occupying the shop unit currently occupied by the chocolate shop. With sensitivity and appropriate engineering advice we feel sure that full step free access can be provided to both to Thurloe Street and to the Museum Tunnel without the need to demolish the entire block. As with the arcade, it appears that one element is being used to advance the case for redevelopment.</p> <p>Parts of this block are remarkably original. The shop fronts at Dacquire and at the Medici Shop for example. Internally, the Medici shop retains original panelling, a fine marble chimneypiece and other attractive historic details, including its original floor plan. It is likely that other parts of this block retain historic features. A proper inspection of the interior of this block is required to ascertain this. It is very important that the quality of this block, a key element in the streetscape and opposite a listed terrace to the north, is not overlooked.</p> <p>We have always argued strongly for the retention of small shops along this parade and can see no reason why original floor plans (including the original doors and fanlights to the flats above) should be swept away. This is the kind of terrace that anywhere else in the Borough would be retained and refurbished.</p> <p>The traditionally designed rear elevation of this terrace is also not without merit. It is little altered and is highly visible from the platform of the District and Circle Line. It sits well atop the historic revetment wall and is a good neighbour to the listed terrace (also visible from the platforms) to the east along Thurloe Street. As such it contributes very positively to the character of the Conservation Area. Its demolition should not be regarded as inevitable, and it is perfectly possible for a mansard to be constructed on top of this terrace (as indeed has been allowed – but not yet constructed – on top of the listed terrace opposite on the north side of Thurloe Street.</p> <p>PELHAM STREET The existing hoarding along Pelham Street is unattractive and there were buildings along this frontage in the past. In principle, we consider that a residential scheme along this street would be appropriate. However, it is not an easy site, particularly with the pavement, and street itself, being so narrow. Much will depend on detailed design. We would oppose retail or restaurant use along this frontage. As you know, we are</p>	

Name	Comment	Council's Response
	<p>strongly opposed to the Wellcome Trust's recent planning application to turn 40 Pelham Street into retail units for the same reason.</p> <p>We would also urge that the setting and scale of the Grade II* terraces in Pelham Place be given proper consideration. This has never happened with previous designs.</p> <p>CONCLUSION In summary, whilst we welcome the proposed capacity upgrade we consider that the Council must insist on the two new lifts to the District and Circle Lines being made operational at the same time as the rest of the upgrade. We are concerned about the future of the Arcade and its integrity, together with that of the Booking Hall, the Bullnose and the Thurloe Street block. If TfL is committed to a "conservation led" approach then it really does need to take the issues we have outlined above seriously and we trust your team will encourage them to do so.</p>	
4 Kensington Society (Michael Bach)	The Society supports step-free access for West Brompton, but also for Ladbrooke Grove, Notting Hill Gate, Kensington High Street, Gloucester Road and South Kensington	Existing Local Plan Policy CT1(k) (which is not part of the scope of the Local Plan Partial Review) already seeks "to ensure that step-free access is delivered at all Underground and rail stations by 2028".
5 Cllr E Dent Coad	Comments from Notting Dale cover this matter.	Noted