

Planning and Place  
Royal Borough of Kensington and  
Chelsea  
Kensington Town Hall  
Hornton Street  
London  
W8 7NX

My reference:

Your reference:

7th November 2025

Dear Sirs,

**Town and Country Planning Act 1990**  
**St Wilfrid's Convent and Care Home, 29 Tite Street and Land to the West of the**  
**National Army Museum, London, SW3 4JX**  
**Application reference: PP/25/04989**

1. We have been instructed by the Tite Street Association Steering Committee (TSASC) to write to the Council (RBKC) with concerns regarding current proposals for this site.
2. An application has been submitted by London Square Developments Ltd (LSD) in respect of the following development:

*"Demolition of existing buildings together with associated hardstanding and the erection of a new building comprising below ground (basement), ground plus five storeys containing residential accommodation (Use Class C3) and museum facilities (Use Class F1), together with associated amenity, storage, car and cycle parking, substation and plant, landscaping and open space, and other associated works"*

3. The details of this proposal raise significant and profound concerns in respect of its height, scale, mass, overall design, amenity impact and the potential harm on the Royal Hospital Conservation Area, including on townscape gaps, as well as the setting of other nearby statutory listed buildings. The development also gives rise to deep concerns relating to movement, parking and access that would arise in respect of the very significant density of development now proposed in this quiet corner of Kensington and Chelsea.
4. Whilst we acknowledge the 'generational opportunity' presented by this site to create a new and more fitting story for Tite Street than the current negative building, the TSA wishes to make clear that the highest possible standards of design, amenity and neighbourliness should be the firm aspirations of any proposals for this site and that the current proposal does not provide an acceptable benchmark for development.

5. The following comments have regard to a series of pre-application responses provided by officers in response to earlier iterations of this scheme. In particular, we reference at times throughout this letter pre-application responses by RBKC to the developers dated 27th January, 31st January and 24th February 2025. We understand from LSD that there has been seven pre-application meetings with RBKC on this scheme and two further meetings with the Quality Review Panel (QRP), but these reflect the most recent available responses at this time.

## **Scale and Massing & Townscape Gaps**

### Scale and Massing

6. The application site is in the Royal Hospital Conservation Area and as such, the impact of proposals on the setting of the Conservation Area (particularly the setting of buildings within the Conservation Area that are noted as making a positive contribution) will be a material consideration in assessing any formal application.
7. The Planning (Listed Buildings and Conservation Areas) Act 1990, s.72, places a 'higher duty' on the Council in the consideration of proposals in Conservation Areas to ensure that *"special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."* This creates a 'higher duty' imposed by statute to safeguard the special characteristics of the Conservation Area.
8. Tite Street has strong historical associations with well-known public figures from the arts and entertainment and political life in the 19<sup>th</sup> and 20<sup>th</sup> Centuries. The street was at the epicentre of the Aesthetic Movement in London from the 1880s to the 1910s, providing a creative base for the likes of John Singer Sargent, Augustus John, Anna Lea Merritt, Edward William Godwin, Sir Robert Edis, and Oscar Wilde. Well-known public figures from the 1880s onwards, such as Lillie Langtry, Ellen Terry, Lady Agnew, Margaret Thatcher, and Princess Diana sat for portraits in the various artist studio houses adorning Tite Street. The historical artist studio houses are mentioned in famous literary works. For example, an essential scene in Oscar Wilde's "The Picture of Dorian Gray" describes in great length and detail the studio room in an artist studio house on Tite Street.
9. The existing care home building on the application site is identified within the Royal Hospital Conservation Area Appraisal as an 'negative building' in the Buildings Audit, shown on figure 2.7. Negative buildings are those which are out of keeping with the prevailing character of the Conservation Area. The Council will support proposals and where possible, take opportunities to make improvements and enhancements to negative buildings, in line with policies CD1 and CD2 of the Local Plan. We agree that the Site is currently blighted by a mediocre 20<sup>th</sup> Century designed building. The redevelopment offers a considerable opportunity for replacement buildings of the highest architectural and townscape quality, while respecting the broader set of RBKC policies and the unique character and appearance of Tite Street.
10. However, the proposed massing and scale (of which the proposed building height is an important component) raises significant concerns that this proposal would give rise to substantial harm to the Conservation Area. The proposed development will be above 21 metres in places (measured to parapet height), which the applicant acknowledges is potentially in breach of Local Plan Policy CD8. Furthermore, paragraph 6.59 of the Local Plan states that a proposal might still not be acceptable if it is (only just) in accordance with this threshold:

*“This definition does not mean that buildings of these heights or below would be automatically acceptable, as they are subject to heritage and design considerations as part of other policies.”*

11. Figure 6.3 of the Local Plan clearly indicates that this is not an appropriate location for tall buildings. Whether or not the applicant considers that a breach of this threshold might be mitigated in this case for other reasons, it would still be defined as a ‘tall building’ regardless of how the case for it is otherwise framed. Therefore, the proposed height in this case would still be unacceptable, as commented on by officers in the pre-application response of February 2024, at paragraph 4.33:

*“Tall buildings will only be acceptable within the locations that are identified as suitable for tall buildings shown in Figure 4.4 of the NLPR. The site is not a site allocation, and the site has not been identified as a suitable location for a tall building. As such, the maximum height of the building should be below the 21m threshold.”*

12. The officers have reiterated this point in paragraphs 4.3 to 4.6 of the pre-application statement of 31st January 2025.
13. The current proposals would constitute an increased canyonisation effect to this part of Tite Street through a combination of the excessive height of the building and erosion of the important townscape gaps. This would be harmful to the character of Tite Street and the surrounding Conservation Area, would appear overly prominent in the surrounding townscape and would worsen the outlook from the properties opposite. As RBKC advised in the 31st January 2025 pre-application response (paragraphs 4.5 and 4.6):

*“The proposed height of the building in combination with the design and massing results in a dominant built form. The mansard style design of the roof results in a horizontal emphasis with no break of massing, emphasising the impression of height, mass, and sits in sharp contrast with the roof profiles along Tite Street. The height of the proposed building should be reduced and should sit no more than between six and five storeys, with the higher storey not continuing the length of the street.”*

14. Therefore, the height of the building should be reduced still further to below 21 metres with the height over the Tite Street gap/ garden where the Convent Chapel is to no higher than the current height of the Chapel.
15. Due to the presence and importance of the affected Townscape Gaps in this case, the importance of the neighbouring artists’ studios and the sensitivity of this location in respect of conservation area character and the setting to adjacent listed buildings, this is not an appropriate location for a building of this height and scale. As noted in the Local Plan at paragraph 6.72:

*“Tall buildings must be of the highest design quality in terms of their appearance, but also internally and in their environmental performance, sustainability, urban design, and safety against fire, as described in Policy CD16. This includes carefully considering scale, height, massing and silhouette. The proportions of the building, especially as they are visible above the prevailing building height, are particularly important. Bulky tall buildings are not attractive to look at and disfigure the skyline; slender ones are more successful.” [emphasis added]*

16. In order to illustrate this point further, the following image of the proposed street elevation along Royal Hospital Road, showing the existing Tesco block to the right on the corner of Tite Street, illustrates the enormity of the proposed building and the degree to which its overall height would be out of character in this location. The excessive bulk and scale of the proposed building, out of character with the streetscene and dwarfing its neighbours, arises from an alarming **increase in the estimated volume of built development compared to the existing building by FOUR times**:



*Above: Proposed development (left) with step-down to Tesco (right)*

17. As if to emphasise further the excessive scale and massing, the following comparison can be made between the proposed development and the NAM building. The NAM building, due to its civic and cultural function, rightly has a prominent and distinctive status in the streetscene that makes sense in terms of the streetview and hierarchy of local character. However, the sheer mass and overdevelopment of this site would overpower the NAM building, presenting an incoherent challenge to this status in townscape terms and diminishing its character and presence by comparison in the Conservation Area.



*Above: Proposed development (right) rising above the NAM building (left)*



18. The NAM building is rightly noted as an important public and institutional building in the Conservation Area (Royal Hospital Conservation Area Appraisal, paragraph 3.72 and paragraph 7.78). Paragraph 7.83 reflects mournfully on the harm arising from the impact on townscape harmony between the Convent site and the NAM building and the current proposals do nothing to positively address this in terms of respect for the public and cultural townscape status and function of the NAM building. The proposed building's role and relationship to its context, part of its 'legibility' in the streetscape, is an important aspect of character and design and thus the proposed building fails to respect or understand this given its demonstratively poor relationship with the NAM building and with regard to the above comments in the CAA; this would be in conflict with Policy CD2(B) of the Local Plan.

#### Townscape Gaps & Views of Townscape Merit

19. Specifically, among other features and in accordance with RBKC's Local Plan 2024 Policies CD1, CD2, CD3 and CD4, we would look for the new building to preserve the existing Townscape Gaps as they currently stand, including their location, with the gap on the Royal Hospital Road end of the site and the Garden.
20. The current Conservation Area Statement (CAA) for the Royal Hospital Conservation Area (March 2016) references these townscape gaps in Figure 2.3:



21. The Royal Hospital CAA identifies at Figure 2.3 that these Townscape Gaps serve as an important breathing space in the dense urban environment. The gaps are integral to the townscape, character and appearance of Tite Street, and provide important vistas, views and gaps in the skyline, across Tite Street and the Royal Hospital Road, and also from buildings in the Royal Hospital grounds and views from neighbouring streets (a point that is very closely associated with the 'Views of Townscape Merit' addressed in the CAA; see further below).

22. Views across the Garden, for instance, provide a wider appreciation of the character and appearance of the Conservation Area through opening up views of Grade II\* and Grade II listed buildings that form part of the Royal Hospital. Any proposed change to these Townscape Gaps would therefore be in direct conflict with RBKC's Local Plan 2024 Policies CD2, CD3 and CD4 in this regard, taking into account the Royal Hospital Conservation Area Statement. The Site includes two important gaps one at the south end (the "Garden") and another at the north end of the site, and these must be preserved as they stand in any future development of the site.

23. Paragraph 199 of the NPPF sets out the national policy context for the assessment of the impact of the proposals on the Conservation Area and other heritage assets that may be affected:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

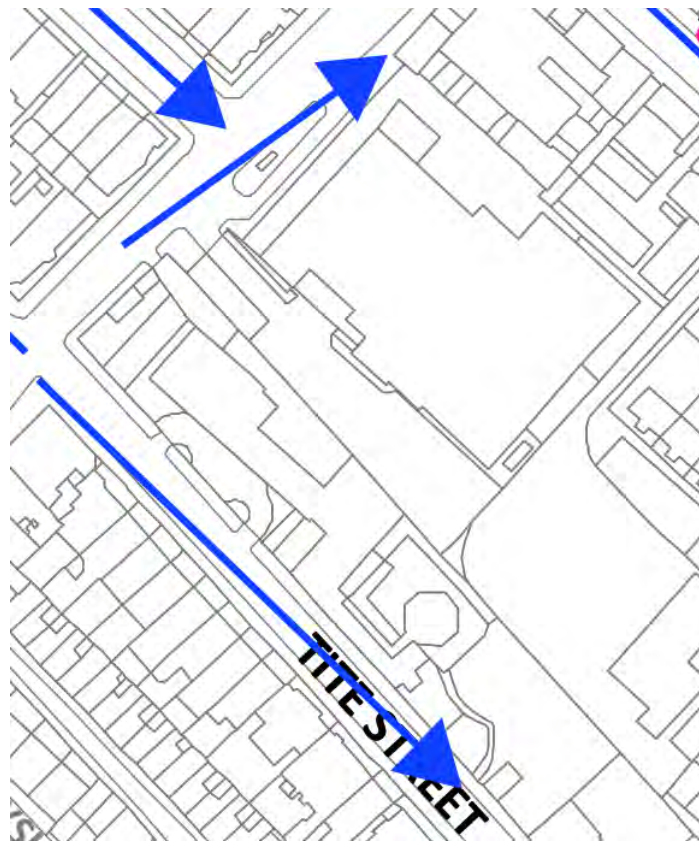
24. In respect of the Tite Street gap, the proposals would involve the encroachment of new build of up to 5 storeys (approximately 20 metres in height) over at least 50% of the existing Tite Street townscape gap. This would vitiate much of the benefit of the proposed green space (which in any case would be significantly smaller than the existing garden) and would significantly erode this gap to the detriment of the street and to the character and appearance of this part of the Conservation Area. This continues to remain incompatible with the Council's policy on gaps. Taken together with the very substantial increase in the scale, height and massing on the site proposed by the applicant, we consider that this would result in substantial harm to the Conservation Area and to its setting.

25. This could only be justified where *"necessary to achieve substantial public benefits that outweigh that harm or loss"* (NPPF, paragraph 214). In the case of loss that is 'less than substantial' the scheme would still need to *"be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"* (NPPF, paragraph 215). Such loss or harm would also weigh heavily against the scheme with regard to the 'higher duty' imposed through s.72 of the 1990 Act as noted above.

26. Paragraphs 3.10 and 3.11 of the Council's pre-application response of 24th February 2025 indicates a strong and justified resistance to the intrusion into the Tite Street gap to this extent. It notes that the existing Chapel is, effectively, single storey and thus a 5-storey structure over the whole of this part of the gap would be harmful to the Conservation Area and would also be harmful to the setting of Nos. 44 (Grade II\*) and 46 (Grade II) Tite Street. The proposed building line to the Tite Street elevation where the building intrudes into the Tite Street gap would also continue to cause concern and would be harmful to the Conservation Area. As noted in the February 2025 advice at 3.10:

*"As previously identified, it is recommended that development is pulled back to the established building line in line with the Chapel. The existing building line does intrude into important gap 1, which does establish a base line for development, albeit the built form in this location is primarily single storey. Development within the gap should therefore need to further reduce the overall height proposed where it intrudes into important gap 1. This should offer the opportunity to create an architecturally distinct building(s) to sit aside the main proposed mansion block. Such an alteration will also aid in addressing the grain of the proposed built form, being more responsive to the existing grain along Tite Street."*

27. In respect of the north-west gap, to the front of the development site on the corner of Tite Street and Royal Hospital Road and the NAM car park, the officers have advised the developer that the development of the building along Royal Hospital Road should align with the existing buildings such as 'Tesco Express'. This is so as to reduce the oppressive or over-bearing visual impact of the building on the Royal Hospital Road and to maintain the vistas along this road in both directions, as noted at paragraph 3.6 of the pre-application response of 24th February 2025 and the pre-application response of 31st January 2025, paragraph 5.5.
28. Closely associated with the principle and importance of these Townscape Gaps is the presence of important views of 'Townscape Merit', recognized by the CAA. These views are an important aspect of Policy CD2 of the Local Plan. This is given additional and very significant weight by Policy CD4 (Conservation Area) and the 'higher duty' referred to above in s.72 of the 1990 Act. Policy CD4 refers to the need to "preserve or enhance the character or appearance and significance of the conservation area and thereby protect the special architectural or historic interest of the area."



29. The screenshot above is from Section 5 of the CAA and shows two important local views, which happen coincide with the Townscape Gap to Tite Street, taking in the row of Artists' Studio houses and the Convent Garden, as well as the Gap across the Royal Hospital Road frontage to the Convent. The latter in particular takes in the NAM building in this view, highlighting the importance of how this site is understood and seen within the context of this important public and cultural building. As noted at paragraph 5.4 of the CAA, "many views along the front elevations of terraces allow their architectural compositions to be fully appreciated and make a positive contribution to the area. Views of rear elevations of terraces also make a positive contribution."



30. In order to assist the Council to appreciate the demonstrable harm to the townscape and to these views, and thus to the Conservation Area and the setting of other heritage assets such as neighbouring listed buildings, we have commissioned CGIs of some of these views along with other local views of importance, such as from the Royal Hospital car park. This will be important to the public appreciation of the sense of space and scale from the proposed multi-function space in this existing Townscape Gap. The following images are courtesy of Rendered Image Limited.



*Image 1.1: View from the Royal Hospital car park Townscape Gap (Existing)*



*Image 1.2: View from the Royal Hospital car park Townscape Gap (Proposed)*



31. The above two images strongly illustrate how very impactful and harmful the proposed scale and massing of the new building would be, especially given the degree to which it would encroach over the Tite Street Townscape Gap and would severely diminish the character and appearance of the Conservation Area, as well as the setting to listed buildings in Tite Street. This also highlights the very need to preserve the existing Tite Street Townscape Gap for its vital role in providing a “**breathing space in the dense urban environment**” (paragraph 2.15 of the Royal Hospital CAA). It is the drastic and proposed loss of much of this space that would directly result in such a ‘cliff-like’ sense of enclosure to the edge of the Royal Hospital car park Townscape Gap and the loss of this critical breathing space which is an integral aspect of the Conservation Area.



*Image 2.1: View of the Tite Street Townscape Gap (Existing)*



*Image 2.2: View of the Tite Street Townscape Gap (Proposed)*

32. The above images of the Tite Street Townscape Gap illustrate the likely significant harm to this Gap from the development proposals and fully conveys the profound concerns shared by local residents as to the serious impact that this scheme will have on local historic townscape and residential amenity.
33. The excessive proposed height is likely to have a harmful impact on the light enjoyed by the historic listed studio apartments on Tite Street, in particular to Nos. 44 and 46, and would damage their special listed character as former artists' studios. The townscape gap and St Wilfrid's Garden are intrinsic to the wider context and setting of these houses and to their architectural and historic heritage, providing vistas, outlook and levels of natural light that reflect the special historic character of these houses as former artists' studios. As was noted by officers in their pre-application response of February 2024:

*"This gap provides a relief and breathing space in the dense urban environment, as well as allowing glimpses of the open spaces and the tops of the buildings behind the site. It is also an established part of the setting of the neighbouring listed buildings".*

34. The following section specifically addresses the harm to listed heritage assets in Tite Street and to their setting that would be caused by the development. We do not believe that the applicant's proposals relating to the garden and townscape gap on Tite Street are compatible with the preservation of this important part of Chelsea's heritage.

### **Listed Buildings**

35. Tite Street has several Grade II and Grade II\* Listed Buildings, with a number of them being right across from the Site or immediately adjacent to the site. The setting of these buildings must be preserved in any redevelopment of the Site. For instance, the Garden must retain an important Townscape Gap that helps to form part of the setting to No.31 Tite Street (Grade II listed).
36. The erosion of the Tite Street Townscape Gap on this site would erode the setting of existing houses, including the artists' studio houses on Tite Street. As this would give rise to harm to designated heritage assets, the NPPF tests referred to above are relevant. The significant erosion of this gap would result in harm to the setting of listed buildings in the street, harm the character and appearance of the Conservation Area and would undermine the historical importance and character of these Gaps, especially with regard to the important contribution made by the 'Aesthetic Movement' to the evolution of Tite Street.
37. As referred to in RBKC's SPG – Artists' Studios, "... the 'Aesthetic Movement', which in turn was closely associated with artists such as Whistler and Rossetti. The guiding principle of the aesthete was to cultivate artistic sensibility and to try to live beautifully in beautiful surroundings". At the time of the beginning of the Aesthetic Movement from about 1860, there was a significant Townscape Gap at the junction of Tite Street and Queens Road West (now named Royal Hospital Road) which took up at least 50% of the site; see the 1870 OS Map (showing Gough House) and the 1890 OS Map (showing the Victoria Hospital) on pages 20 and 21 in Part 1 of the applicant's HTVIA. Despite later harmful development, the erection of the St Wilfrid's Convent and Care Home on the site reinstituted a similar Townscape Gap further into Tite Street, whilst retaining the semblance of the original street frontage gap on the Royal Hospital Road. Therefore, it is critical to preserve them in their current form as integral to the character of Tite Street and of the townscape surrounding the artists' studios and providing them with unique natural light conditions.

38. In addition, the presence of artists' studios is often referred to in the listed building official entry for these properties, such as for No.44 Tite Street. Therefore, the impact of any future development on this Site on neighbouring houses in terms of loss of sunlight and daylight would not only be harmful generally in terms of the impact on residential amenity, but also potentially harmful in listed building terms, providing justification for refusal. Paragraph 6.17 of the Local Plan is part of the supporting justification to Policy CD1 (Context and Character) and notes the importance of these former Artists' Studios with regard to their contribution to the historic character of the Borough:

*"Artists' studios emerged in the middle of the nineteenth century and there are significant numbers of them in the borough, making an important contribution to its particular character and appearance. A distinctive building type, they are characterised by a number of features including large windows and expanses of studio space behind. They exist in many forms from grand studio houses commissioned by famous artists of the day, to more modest and utilitarian speculatively built groups. There is considerable pressure upon them both for the introduction of new uses and the carrying out of alterations. This pressure is threatening the essence and character of these studios and consequently, undermining the artistic traditions of the borough."*

39. In respect of the applicant's Daylight, Sunlight and Overshadowing (DSO) Report, the proposal would significantly impact on the light received, and by extension the historic character, for example to the main living room window that faces the site to No.44 Tite Street, a Grade II\* listed building. A likely reduction of 25-30% would be experienced. Although categorised in broad terms as 'minor-moderate', this would still be a noticeable diminution in amenity to the occupiers of this property as it affects the front room to their main living room space, as well as representing a potentially harmful impact to the character of this former artists' studio as the light experienced by occupiers of this space is integral to the appreciation of its former historic use. In respect of the harm to the living spaces of other listed former artists' studios at No.34 (Grade II listed) and No.46 (Grade II listed), the degree of harm in terms of projected loss of light to the living rooms of these houses would similarly be around 26-38% (No.46) to relevant living room or drawing room windows.
40. As noted by officers in the pre-application response of 31st January 2025 at paragraphs 3.18 and 3.19:

*"Part of the significance of nos.44 and 46 does relate to their design as Artists' Studios. The interpretation of light with these buildings is an important relevant consideration. The impact of the proposed built form with nos.44 and 46 should be carefully considered and the height may need to be reduced to ensure its significance is preserved, as per criterion E(2) of Local Plan 2024 Policy CD3. The impact on no.44 particularly is of concern. Currently the overall height appears to exceed the terminus of those buildings on Tite Street, which in combination with the horizontal massing proposed, does appear overtly dominated. The height should be reduced and the massing broken up to reflect the vertical emphasis of the listed buildings on Tite Street."*

41. As noted above generally in respect of residential amenity, similar breaches of recommended minima in terms of sunlight and daylight would be harmful to occupiers of other neighbouring properties. Cumulatively, this should be regarded as harmful to the character of the conservation area as well as to the historic character of individual properties and is a reasonable indicator of the unacceptable scale, height and massing of the new development as currently proposed.



42. Protecting the Townscape Gaps as they stand, including their location, and ensuring that the character and appearance of the buildings included in any proposed development are in keeping with those of the other houses in Tite Street are integral to preserving this unique and important street and its significance in the context of the Royal Hospital Conservation Area and the Royal Borough.

## Design & Form

43. Policy CD2 of the Local Plan places significant importance on the need for high quality design proposals appropriate to an area and its local character. Paragraph 6.25 states in particular that:

*“Design proposals should be based on a thorough analysis and understanding of the site’s setting, context and character, including careful consideration of building lines, roof lines and setbacks, streetscape rhythm and landscape features, history and use.”*

44. Furthermore, the west side of Tite Street has a variety of building heights, and markedly less uniformity than in other streets nearby. This was clearly intended from the very beginnings of development in Tite Street, with buildings being commissioned for their individuality, and is a feature that should be preserved in any development of the site.
45. This variegated terrace with its individually-styled houses provides an important positive contribution to the character and appearance of this part of the Conservation Area, which in many respects reflects not only the underlying principles of the ‘Aesthetic Movement’ with which this terrace is so deeply connected, but also a sense of artistic originality and creativity in its various artists’ studio houses that should be retained in terms of its architectural prominence in the streetscape. Therefore, we consider that this should inform the desired design, height and massing of the proposed development on this Site, such that it does not appear as over-dominant in terms of its relationship with its existing neighbours, especially given that Tite Street is a relatively narrow single carriageway. The present façade of the west side of Tite St with its centre on the Tower House presents almost a Palladian formality of elevation that is undermined by the massive block proposed on the east side.
46. A key belief of “the Aesthetic Movement was that art could positively shape everyday life”. The Design and Access document at page 65 illustrates a series of the Tite Street artists houses. For Edward Godwin, the architect of the Tite Street artists houses, the primary objective was to bring light into the studio spaces and habitable rooms of these buildings. Light determined the functions and forms of their architectural expression. They “display a deliberate departure from formal symmetry, instead favouring dynamic asymmetrical compositions...”
47. It is this design for light that calls for the variety of window shapes, sizes and projections together with a balance of horizontal and vertical rhythms and which characterises this street of artists houses. The rich palette of materials, colours and forms became integral to the local vernacular and inspired much of the late 19<sup>th</sup> and early 20<sup>th</sup> century architecture of Chelsea.
48. It should be noted that in the current proposal, one third of the habitable rooms fail current daylighting standards. This alone is indicative of the inappropriate architectural design and detail of the proposal. It is dark, not light.
49. The somewhat Parisian shape of the long horizontal mansard roof is an alien element to the conservation area. The monotonous bulk and symmetry of the block would fight with the delicacy and variety of this historic context.



50. The projecting balconies of the proposals may be intended to provide privacy, instead, they add a cumbersome mass to the exterior and would overshadow interior spaces. In lieu of the delicate asymmetric rhythm, palette and detail of Godwin's listed artists houses, the proposal presents a dark, largely monochromatic monumental block that would be totally over scaled and dominant in this important historic setting. The application sections show how the proposal would tower above the robust form of the NAM (only 14m apart) and be a full two storeys above the facing corner (Tesco).
51. The proposed design fails to understand or respond to the nuance, sophistication and artistic aspirations of Godwin and his renowned artist clients. It would create an unwelcome and overweight canyon to the detriment of this street defined by some of Chelsea's most important and original listed artists houses. It has no place within the Royal Hospital Conservation Area and in sight of Sir Christopher Wren's Grade I masterpiece.
52. A recent development in Hans Place demonstrates a more accomplished and appropriate architectural response and better understanding of local context and character, indicating what can be achieved:



*Above: recent development in Hans Place*

53. One feature worth noting from the above is the narrow white strips below the small balconies in the Hans Place building. In comparison, LSD's proposal incorporates incongruously large and visually discordant balconies that conflict with local appearance and palette and are entirely alien features in the local streetscape whilst inflicting a degree of 'self-harm' to the amenity of the windows serving habitable rooms below which will then suffer poor natural light as a result. This is an indicator of poor and ill-considered design.
54. As endorsed by Council officers in recent pre-applications with the applicant, on the east side of Tite Street, the development should mirror the depth and character of setting back from the pavement that is present on the townhouses on the west side of Tite Street. Also on the east side of Tite Street, it should align along parallel lines to the townhouses on the west side of Tite Street and take into account the variety of building heights and relative lack of uniformity of buildings in the south end of Tite Street (below Royal Hospital Road).
55. In terms of the upper storeys, the development should mirror the roof storeys pitching away from the street on the townhouses on the west side of Tite Street to provide visual relief along the street and mirror the vertical emphasis of the residential buildings on the west side of Tite Street.
56. The grossly oversized proposed apartments is also a key factor contributing to the overdevelopment of this site. The Knight Frank 'Pricing and Market Report to support Planning Viability' (May 2025) sets out the average apartment sizes proposed. The following table compares these floor areas with Nationally Described Space Standards (NDSS):

<b>Dwelling Size</b>	<b>NDSS minima (sqm)</b>	<b>Average floor area proposed (sqm)</b>	<b>% floor area over NDSS</b>
1-bedroom 2-person	50	70	40%
2-bedroom 4-person	70	149	173%
3-bedroom 6-person	95	239	152%
4-bedroom 8-person	117	309	164%

57. Policy D3 of the London Plan requires the optimisation of development sites, which is carried through to Policy HO1(A) of the Local Plan, which states in particular:
- Optimising the homes delivered on all sites using a design led approach and benchmarking against the nationally described housing standards (Policy HO1, A5).
  - Resist very large homes by benchmarking floorspace against nationally described housing standards (Policy HO1, A7).

58. Paragraph 5.12 of the Local Plan explains further as follows:

*“The nationally described minimum space standards as adopted in the London Plan must be used as a benchmark for the size of homes. This ensures that we are optimising sites and meeting these space standards but not going above them so significantly as to create very large homes. The provision of super prime large homes has an impact on the ability of the borough to meet its housing supply targets as the sites for these developments are often capable of accommodating a much larger number of smaller units. Very large homes are also linked to the issue of “buy to leave” housing which are bought for investment rather than living and are not conducive to creating thriving communities for all which is the ambition of this Plan.”*

59. This approach is repeated in Policy HO4(C). Paragraph 5.58 under this policy states:

*“As the space standards are a minimum, developments are encouraged to exceed the standards but not so significantly as to create very large homes and hinder the optimisation of sites as set out in Policy HO1.”*

60. Therefore, the proposed apartments, albeit clearly designed to appeal to the ‘super prime’ residential market would be far in excess of the NDSS and even the London Planning Guidance Housing Design Standards (Appendix 1 sets out ‘best practice standards’ typically allowing for roughly 10% in excess of NDSS). These over-sized apartments, which would be in breach of the London Plan and Local Plan Policies HO1 and HO4, have led to proposals for an ‘over bloated’ building envelope that would be an overdevelopment of the site, causing harm to local character, heritage and amenity.

### **Residential Amenity**

61. The site adjoins neighbouring residential buildings to the south and west along Tite Street with further residential buildings located to the north, on the opposite side of the highway along Tite Street. It is acknowledged that one of the key matters for determining the massing proposed as part of this application is the impact upon daylight and sunlight of the surrounding residential buildings.

62. The DSO report notes that 11 of the 51 rooms assessed in terms of the impact on ‘no sky limit, will meet the BRE criteria. Therefore, 4/5ths of the proposed development would not meet BRE criteria. The DSO report attempts to rationalise this by stating that ‘only’ 12 of the remaining 40 rooms are living rooms; i.e. 30% of the non-compliant rooms. This is deeply concerning for neighbouring residents, who will be directly impacted by this development.

63. In addition, the DSO report indicates that “102 of the 153 rooms assessed (67%) meet the suggested median lux levels for their room use (assuming a 200 lux target value for LKD’s). This increases to 111 rooms (73%) should we use a target value of 150 lux.” Therefore, with a generous but reasonable level of light given the high quality of the scheme, one third of the scheme will fail. Applying more constrained light conditions, one quarter of the scheme would still fail.

64. This is an indication of either over development or weaknesses in design; neither should be an excuse for any proposed development and should be regarded as a potential failure to meet the standards expected through Local Plan Policy CD9(B). This policy states as follows:

*“ensure that good standards of daylight and sunlight are achieved in new development and in existing properties affected by new development; and where they are already substandard, that there should be no material worsening of the conditions.” [emphasis added]*

65. Given the general extent of non-compliance in terms of the number of houses impacted, number of habitable room windows and the percentage of non-compliance (resulting in some cases in a worsening of between 20%-30%), this is definitely a “material worsening of the conditions”.
66. The incorporation of single aspect apartments (22 of the proposed 42 apartments would be single aspect) to the development creates oversize and deep apartments and living rooms and little dual aspect or natural cross-ventilation to apartments. Therefore, the design and layout of the proposed development have imposed these limitations on the proposed amenity of the future occupiers to the development; it is not an inevitable and unavoidable consequence inherent to the shape of location of the site and its context. Even if it cannot be wholly avoided, this harm could be very significantly mitigated through a more appropriate design and layout to the scheme.
67. In addition, Policy CD9(D) refers to:

*“require that there is no harmful increase in the sense of enclosure to existing buildings and spaces, neighbouring gardens, balconies and terraces.”*

68. The proposed building would be overbearing and over dominant. This would be so not only in visual terms but also with regard to the loss of natural light that would be significant to existing living rooms and other habitable spaces, resulting in a more oppressive living environment for those in houses directly adjacent to the development site.

## **Housing**

69. Whilst we acknowledge that a redevelopment of the Site presents an opportunity to contribute towards addressing RBKC’s housing needs and achieving its housing targets, this should clearly not be maximized to the detriment of other key RBKC policies. These other policy priorities include in this case the protection of certain ‘Townscape Gaps’ (as defined above), retaining a social and community use, character and appearance of Tite Street with its mix of individual buildings and vertical lines, the setting of the various listed buildings and artists’ studios (including setting back from the pavement) and ensuring that there is no increase in traffic congestion and that the balance between parking needs and availability remains acceptable and that the risk of flooding is not increased.
70. Notwithstanding our comments below in respect of the loss of care home use from this site or the balance of social and community use on the site, the provision of affordable housing should normally be an integral part of the redevelopment of the Site. The delivery of development that contributes to mixed and balanced communities remains an overarching principle of the Government’s housing delivery policy. Whilst we appreciate the economic constraints of delivering some affordable housing tenures on sites in high-value areas such as Kensington, further consideration should be given at least to the potential for key worker and/or shared ownership housing on the same site, subject to the participation of a willing registered provider to partner in this provision.



71. With regard to the LHNA and the projected increase in those of 65 years' or older, we welcome the proposed delivery of M4 (2) "accessible and adaptable dwellings", and a minimum of 10 per cent of new homes at M4(3) standard for "wheelchair user dwellings".
72. The proposed dwelling mix is acknowledged. However, the proposed apartment sizes are grossly in excess of London Plan, Local Plan and national space standards. As noted above, these would be in breach of national, London and local policies geared toward optimising residential development and would lead to many of the apartments largely being bought for the 'buy to leave' market for investment purposes and thus undermining the achievement of mixed and balanced communities and local community cohesion. Furthermore, the provision of apartments that are between two and two and a half times larger than the NDSS minima will severely harm the Borough's ability to meet its housing supply targets.
73. The design of over-sized proposed apartments is clearly central to the applicant's financial strategy for the site in order to cover and then seek an 'adequate' return on their 'risk' in respect of the amount of money they may have paid for the site initially. However, it should not be down to the Council to have to bear the under-provision of viable housing or affordable housing that should be possible instead had the applicant instead put forward a more reasonable and efficient scheme that was not reliant on grossly oversized luxury apartments. In addition, to the extent that these sizes have led to the scale and massing proposed, assuming a need for a given number of apartments driven by the applicant's financial pressures on this site, the local community and neighbouring residents should not have to bear the demonstrable harm to local amenity, character and heritage value that arises from these proposals.

### **Care Home Use**

74. The Care Home would constitute a "social and community use" for the purposes of applying RBKC planning policies. In particular, this use engages Local Plan 2024 Policy HO5, which requires that such uses must be protected "unless the loss is to improve substandard accommodation or increase the existing provision on the site." There is an established need for such accommodation in RBKC, as evidenced by the Local Housing Needs Assessment 2022 (LHNA) that there is in RBKC "a 68 per cent increase in older people with mobility difficulties and a 47 per cent increase in the people with dementia from 2021 to 2040" (Local Plan, paragraph 5.62).
75. The LHNA shows that the number of residents aged 65 or more is projected to increase by 13,911 by 2040, a 54 per cent increase; within this, an 82 per cent increase for those aged 75 or more and a 131 per cent increase for those aged 85 or over is projected. Therefore, the retention of the current use on this site, or similar within Policy HO5 is likely to be a priority local need, and the proposed loss of such a use from this site would prejudice the aims and objectives of the new Local Plan.
76. It is not true to claim that "there is an adequate supply of care home provision across London", as LSD does in DP9's Planning Statement (paragraph 7.17). This misrepresents the LNHA, which instead states the following at paragraph 4.30:

*“GLA commissioned research indicated that at the time of writing (2017) there was an adequate supply of care and nursing homes in London, though not all were at the standards they should be. We have noted that in the main RBKC’s accommodation is of good quality. Looking forward, based only on the good quality accommodation, the report indicated that some 867 extra care home places per annum would be required until 2029. The research did not project until 2040, but it could be reasonably assumed that increasing demand would continue, given the overall ageing population.”*

77. Therefore, there may have been evidence of an ‘adequate supply’ nearly 10 years ago, but the cumulative need over time, driven by ageing demographics in London, leads to the conclusion that “some 867 extra care home places per annum would be required until 2029”. Accordingly, the two examples provided by DP9 are merely a drop in the ocean in terms of the likely overall requirement now in London and within the Borough. Furthermore, there would also need to be an allowance for the speed and rate of development delivery; merely obtaining planning permission does not of course mean that extra care bedspaces are immediately available as this can be affected by funding, rising construction costs and project overruns.
78. We appreciate that RBKC needs to weigh any loss of opportunity to place a social and community use at the heart of these proposals against other benefits that the scheme may bring in principle, such as extra housing. However, we wish to underscore that such a need still persists (despite the applicant’s selective quotation of the LHNA) and our deep concern is that the promotion of this site and the current proposals have been contrived in a way more led by the business model of the applicant, who has confessed that community and elderly people’s housing is not their expertise, rather than led by the objectives and priorities of the Local Plan.

### **Provision of Open Space and NAM space**

79. In respect of the loss of the Convent (aside from sustainability considerations relating to the physical loss of the Chapel), this engages Policy SI1(D) of the Local Plan through the replacement of existing ‘social and community’ use (i.e. a place of worship) with another such use (i.e. additional ‘cultural use’ space and adjacent ‘open space’).
80. Policy GB15(B) addresses the provision of Open Space in the Borough. Policy GP15(E) states that: *“Proposals for new public open space will need to be designed in line with the requirements of Policy GB14 and provide a range of outdoor activities for users of all ages.”* Policy GB14(E) requires that new open space should meet a number of criteria, including: *“Be of a high quality and compatible with the surrounding landscape, and townscape character.”* The oppressive and overwhelming scale and massing of the new block, as experienced from the proposed new open space adjacent to the National Army Museum (NAM) would raise legitimate questions as to whether the open space would be of ‘high quality’ or ‘compatible with the surrounding landscape and townscape character’.
81. Therefore, although the proposed open space and extensions to NAM are welcomed in principle, the degree to which they contribute additional benefit within the context of the proposals as a whole should not be overstated and only moderate weight should be given to these aspects on balance.

## Highways and Parking



### Traffic and Parking

82. Careful attention and planning consideration is warranted for traffic and parking in Tite Street. Tite Street has become a very busy cut-through artery for vehicles driving to/from Chelsea Embankment, and at times, there are severe grid-locks which occur in what is a single lane road, with limited parking spaces. We are advised that, during these times, cars from both ends are blocked from moving forward for a considerable period of time. This is being aggravated by TFL traffic schemes on Chelsea Embankment that are reducing access to roads linking the embankment to central Chelsea and increasing traffic substantially on those few roads that remain.
83. In this context, any material increase in traffic or in the number of residents using on-street parking pursuant to a development of the Site would lead to an unmanageable level of increased congestion in the area. Furthermore, any provision of off-street parking within the development, for example by including a basement parking area for residents could materially and negatively impact congestion in Tite Street and the surrounding area.
84. Much of the east side of Tite Street, along the edge of the Site, is single yellow line, which permits parking outside of controlled hours at the weekends and in the evenings during the week. RBKC's Transport and Streets SPD 4.1.2 states that: "In order to ensure that development does not add to on-street parking demand in its locality, or in the borough's shopping centres, all new additional residential units will be required to be residents' parking permit-free". Even where the development might be subject to similar controls through a Section 106 Agreement, this would not prevent additional vehicles being parked on Tite Street. Together, the additional traffic congestion and on-street parking impact could be in direct contravention of RBKC's Local Plan 2024 Policy TR8. As stated in RBKC's Transport and Streets SPD 3.1.1, "the provision of a large number of parking spaces in a development will result in a larger number of car trips in the peak hours ... Traffic congestion is also a problem in some parts of the borough and increasing road capacity to accommodate the demand generated by new developments can exacerbate these problems as well as increasing dependence on the car."
85. In respect of cycle parking to the development, the Design and Access Statement suggests that cycle access would be via the single 'service lift' that leads directly out on to Royal Hospital Road. It is unclear how this would work in practice if several people were waiting to be able to manoeuvre their bicycle in or out of the block, whilst also delivery vans or vehicles queuing to access or exit using the same lift.
86. It would appear from the ground floor and lower ground floor proposed layouts (drawing numbers 0203 and 0201 respectively) that users of the bicycle store would otherwise need to wheel their bicycle through two sets of doors, turn a corner then another, go through two more sets of doors, through the 'residential amenity area', access the lift (is this large enough with a bicycle?), access three more sets of doors and round two more corners before finally exiting out of the main entrance. This is such a convoluted and obstacle-laden route as to disincentivise anyone who wants to use a bicycle.

87. Section 8.5.3 of the London Cycling Design Standards (Transport for London) is a material consideration in applying the London Plan Policies (in particular Policy T5(B) of the London Plan 2021). According to the LCDS, residential cycle parking should be: *“well located: close to the entrance of the property and avoiding obstacles such as stairs, multiple doors, narrow doorways (less than 1.2 metres wide) and tight corners.”* This is clearly not the case as proposed and thus the current cycle parking arrangements as proposed would be in conflict with London Plan Policy T5 and Policy TR6(E) of the Local Plan.
88. It is also unclear as to where the “visiting cycle” access is on Tite Street. It needs to be highlighted that at no time of day should any bicycles, be they privately owned or hired, be left on the pavements of either Tite Street or Royal Hospital Road. The ‘littering’ of public bicycles is a profound problem in the local area, causing obstruction to pedestrian footways and severe trip hazards.

#### Refuse Collection

89. The Design and Access Statement suggests that the collection of the refuse and recycling from the development would be from Royal Hospital Road, taken via the ‘service lift’. As above with the use of this lift by bicycle users and servicing and delivery vehicles, this could easily lead to competition for the use of this single lift and thus delay and inconvenience whilst vehicles are queuing on the street or over the pavement trying to access the block.
90. The proposed basement floor plan (drawing number 0200) indicates two separate areas of bin storage. However, it is not clear whether these areas are adequate for the full number of waste and recycling bins likely to be required.
91. Therefore, we consider that waste collection vehicles should instead collect from the rear, between the NAM building and 29 Tite Street; collection vehicles could reverse into the gap between 29 Tite Street and the NAM building so as to collect waste and recycling from the development, which could also be co-ordinated with deliveries to NAM.

#### Servicing

92. The proposed development is likely to lead to a very significant increase in traffic and movements relating to servicing and deliveries, possibly as much as another 250-300 deliveries/week (on basis of 42 deliveries per day – i.e. one per unit per day). Even half of this number of deliveries is likely to lead to significant impact on the local highways network. The impact on the current flow of traffic could be further impacted by possible backlog of service and delivery vehicles at the entrance to the site; proposals for an electronically controlled access suggests that vehicles delivering to the Tite Street entrance will need to wait for access to be opened. Given the narrow and constrained nature of Tite Street, it is not reasonable that this should be the main point of access. Therefore, further consideration (or possibly removal) of this gated access at this point may be required.



93. Policy TR9(A) and (B) of the Local Plan 2024 requires that servicing to new developments “*should not give rise to traffic congestion, conflict with pedestrians or be detrimental to residential amenity*” and “*must provide sufficient on-site servicing space where feasible, delivery consolidation floorspace, and coach parking to accommodate the number and type of vehicles likely to be generated and to ensure that this can take place without manoeuvring on the highway*”.
94. The area from the edge of the service lift to the edge of the footway along the Royal Hospital Road is clearly less than 6 metres. This depth is not deep enough. All service vehicles need to be able to park within 29 Tite Street. Regarding the parking area accessed by the lifts, the size of vehicles should be fully considered, and we remain unconvinced that full and proper regard has been had to the varying sizes of delivery vehicles and vans. For instance, average Ford Transit vans range from 5.5m to 6.7m in length and from 2.5m to 2.8m in height. If the proposed development fails to properly cater for such vehicles, this will push visiting service contractors’ vehicles onto the surrounding streets, using meters, residents parking bays, illegal parking and so on. This too will exacerbate an already impossible situation with the ongoing volume of traffic in the neighbourhood and traffic congestion.
95. Any larger vehicle protruding onto the footway will cause obstruction to pedestrians and create significant safety risks for both pedestrians and oncoming traffic on Royal Hospital Road. This could also lead to a backup of vehicles onto Royal Hospital Road, especially if combined with visiting coaches dropping off/ collecting visitors to the Army Museum, and will also impact the flow of traffic along Royal Hospital Road and will create a knock effect within the surrounding streets. An effective “visibility splay” as would be needed to allow safe vehicle access will significantly diminish a safe and wide footway for pedestrians (prams, disability vehicles, elderly etc).

#### Reducing the impact of construction on the highway

96. Any development of the site will have a major impact on the daily lives and on the quality of life of all residents in the area, as well on traffic levels and flow and parking availability and therefore will require particular attention and strict compliance with RBKC’s Transport and Streets SPD, and in particular section 8. Disruption to the neighbourhood needs to be minimized to the full extent possible, and we look forward to engaging well ahead of any plans being formed, in accordance with section 8.1.6. All developments must comply with the RBKC Code of Construction Practice and “must not create unacceptable impact on local residential amenity including neighbouring properties as a result of demolition and construction” (Local Plan policy GB7).
97. Tite Street continues to suffer from roadblocks created by HGVs, delivery vans and the like. Tite Street is not classified as a B road. It is a local access road only. It should not be used as a “rat run”, and certainly not a road for heavy goods vehicles. We wish to see RBKC negotiate with TFL to have the EAST to WEST coaches resume their old route of turning right and going along the Embankment until the development work is over. Tite Street must be made one way during construction. At no point during this window should ANY construction related vehicle be routed in either direction along Tite Street.
98. At no time during construction should any construction traffic impede on either the public highways or footpaths. Proposals for “just in time” deliveries to the construction site rarely run smoothly, often resulting in cross-over in delivery times between suppliers, causing local disruption, highways congestion and displacing legitimate residents’ parking on Tite Street as well as potential conflict with Tesco customers and deliveries, which could all be pushed up Tite Street and further north.

99. Residents are profoundly concerned that the development will lead to the level of disruption caused by construction vehicles, servicing and deliveries that residents have suffered on Durham Place during the past 5 years. It is essential that the residents in the area are assured that the construction site will provide sufficient lock ups for contractors and subcontractors tools and personal gear, alleviating an unwanted volume of vans of all sizes parking in the neighbourhood. Furthermore, assurance is required that works will be restricted to normal construction hours; statements in the application that “works are anticipated to take place during normal construction hours....” (emphasis added) suggests that this may not be the case at all times. We need certainty that it will always be the case.
100. To ensure suitable traffic management during the construction phase, the developer should commit to operating a CCTV monitoring system that will be available for scrutiny by RBKC officers to verify cases of traffic obstruction and accidents.

### **Conclusion**

101. Whilst it is acknowledged that the applicant has engaged with residents and the Council on several occasions and sought to make changes to the scheme, the proposed development remains wholly unacceptable. It continues to raise significant concerns relating to height, scale, massing, amenity, overall design aesthetic, highways and parking impact. Furthermore, these impacts carry particularly significant weight in this context given the potential for significant harm to the special character of the listed and other artists’ studios on Tite Street and the harm to the character and appearance of the Royal Hospital Conservation Area.
102. The significant erosion to Townscape Gaps in this part of the Conservation Area, especially along the Tite Street frontage as well as harmful impact to the setting of neighbouring listed buildings has been raised by the Quality Review Panel and by planning officers on several occasions. This harm would not be outweighed by factors of broader public benefit, such as but not limited to the future provision of replacement social and community floor space in the current proposals. This would be in conflict with the Council’s Local Plan, the London Plan and the NPPF. Regrettably, despite the clear and repeated calls from residents, architectural experts on the QRP and from Council officers to reflect further on the need for these changes, the applicant continues to try and push this scheme through regardless of the perfectly reasonable and well-founded concerns of all.
103. If the applicant’s approach is allowed to prevail in this case, then this would only open the door for similar schemes to come forward taking a similarly unneighbourly approach to local concerns and amenity elsewhere throughout the Royal Borough. This could become a precedent for other sites, rippling out to cause severe cumulative impact to the wider residential community in the Borough.
104. The amount of development suggested raises significant concerns for local residents in respect of parking, servicing and highways impact and safety. There are significant concerns for the wider RBKC residential community relating to the impact of construction traffic, servicing and deliveries and potential disturbance, loss of parking, congestion and safety of pedestrians, cyclists, wheelchair users and others.



105. We would be grateful if RBKC would give significant weight to this letter and our concerns in considering this application in order to ensure that the Site is redeveloped for a high quality and sustainable future use that is sensitive to the heritage, conservation and traffic characteristics of this area, and meets priority local needs.

Yours faithfully,

**David Kemp BSc(Hons) MRICS Barrister\***

Director

DRK Planning Ltd

(\*non-practising member)