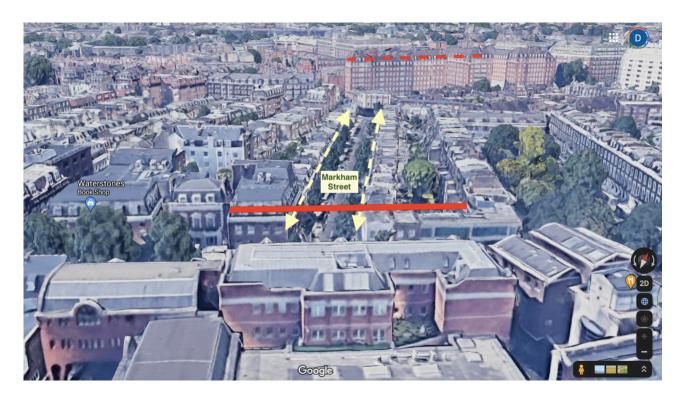
MARKHAM STREET RESIDENTS' ASSOCIATION

OBJECTION to Application number: PP/21/01425 81-103 (odd) King's Road, LONDON, SW3 4NX

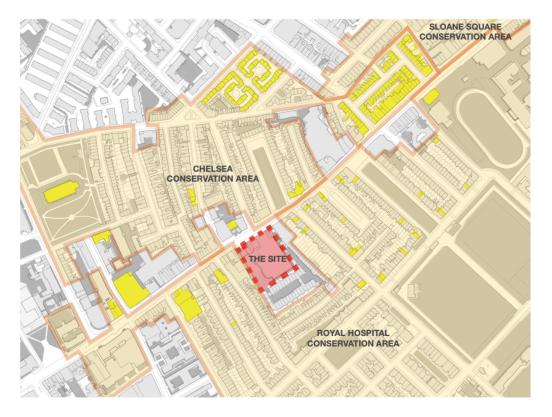
The proposed building is too monolithic, dominant and intrusive. It is too detrimental to Markham Street and the surrounding Conservation Areas.

30th April 2021



Demolition of existing building and redevelopment for new building up to five storeys (Use Class E); basement excavation works; creation of a courtyard area at ground and lower ground levels; roof terraces; landscaping works; installation of plant; and associated works. (MAJOR APPLICATION)

- 1. Markham Street has cohesive north-south terraces of low-rise houses comprising two storeys, basements and attic rooms under mansard roofs.
- 2. Brick, stucco and black railings define the aesthetic, giving the street a traditional feel. At the same time, it is one of only a handful of streets to feature pastel-coloured facades, considered to be quintessentially "Chelsea", which lend it a particular charm and character.
- 3. The street sits in the Chelsea Conservation Area. The following map, taken from the applicant's 'Design & Access Statement February 2021', shows this and shows Markham Street in relation to the site (it is the street running north-west from the site's King's Road frontage).



- 4. We note the Council's Building height supplementary planning document, which quotes, "Within the Royal Borough's conservation areas historic environment considerations are of such significance that they are regarded as highly sensitive locations for tall buildings, where there is a strong presumption against anything other than occasional local landmarks." (UDP, Policy CD61, Strat 10)
- 5. The historically low-rise character of Markham Street can be appreciated from the following photo, taken around half a century ago:



6. By the time the south-facing photo (above) was taken, the view to the north was already impacted by Cranmer Court, a large brick residential block (shown below, today). Cranmer Court is not sited in immediate proximity to the street, thankfully, and therefore it has not greatly diminished the street's low-rise charm.



7. We would like to draw attention to Council Policy CL12, Building Heights, which states that the Council will require new buildings to respect the setting of the Borough's valued townscapes and landscapes, through appropriate building heights. To deliver this the Council will, inter alia: a. require proposals to strengthen our traditional townscape in terms of building heights and roofscape by requiring developments to: i. reflect the prevailing building heights within the context; ii. provide, for larger developments, a roofscape that reflects that of the context of the site; iii. seldom use height to express local landmarks so the prevailing building height is maintained; b. resist buildings significantly taller than the surrounding townscape other than in exceptionally rare

- circumstances, where the development has a wholly positive impact on the character and quality of the townscape; etc.
- 8. At the south end of Markham Street, the building that currently houses Marks & Spencer (constructed in the 1980s) remains respectful to the scale and aesthetic of the street and conforms to the principles of current Council policy.
- 9. We believe that the applicant's proposal does the exact opposite: it is far too tall; its strident glass tower would be more at home in the City than at the end of a quintessentially Chelsea street, and, because of the north-south orientation of Markham Street, this discordant and over-bearing frontage would dominate the entire length of the street.
- 10. The following views existing and proposed come from the applicant's 'Townscape, Heritage and Visual Impact Assessment'.



11. We believe the image of the proposed development, below, is misleading in that the glass tower is rendered to be unnaturally light-filled and transparent. We note that the shadows of the trees in the image suggest sunlight arriving from due west (the right-hand side of the photo). Accordingly, we believe that, in reality, the building would give a much greater sense of enclosure.



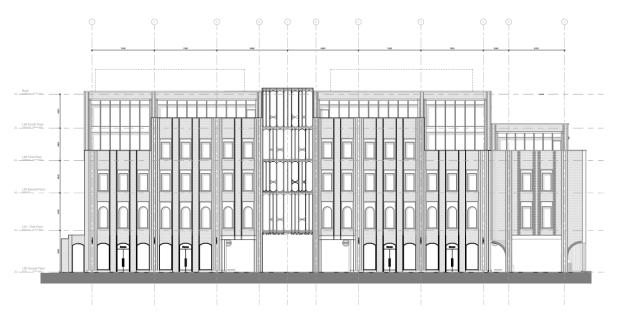
12. Setting these images side-by-side suggests that the frontage of the proposed building would be at least 50% taller than that of the existing building:





13.A more careful check, involving elevations in the applicant's submissions, suggests that the current building is around 15m (49 feet) tall at its highest point, and the frontage of the new building would be around 22.5 metres (74 feet) tall.

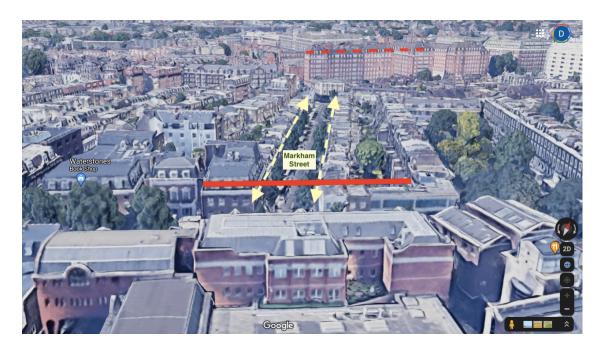




- 14. This measuring process is stymied by the dimensions stopping short of the top of the façade. (Indeed, there is a raised section of the roof, which would be recessed from the front but still visible from the sides, that appears to raise the height of the proposed building to over 80 feet).
- 15. We believe that the proximity of this mass and its incompatible aesthetic would seriously and negatively impact the character, views and charm of Markham Street.
- 16. We are concerned about the precedent that it would set and the likelihood that other landlords and developers would plan similarly large buildings in the same section of the King's Road. We note that Martin's Properties has commented in support of the scheme.
- 17. We strongly welcome the Council's aforementioned planning policies that safeguard streets such as Markham Street, in light of past missteps and the harm these missteps can cause, for example red-brick Thackeray Court, immediately to the north of Bywater Street, shown below.



18.A particularly unfortunate consequence of the mass and height of the proposed development would be that it would visually 'book end' with Cranmer Court to the north of Markham Street, suddenly making Markham Street's terraces look unnaturally low (currently, Cranmer Court looks anomalously tall). This is indicated by the annotated view from Google Earth, overleaf. The red lines show the rooflines of Cranmer Court and the proposed development. The pale yellow arrows mark out the rooflines of Markham Street's terraces.



- 19. We have additional concerns about the traffic pollution that would result from the ongoing operation of such a large-scale site and the lengthy construction phase. The applicant estimates that the construction period would be three years but we are not convinced that the applicant has yet produced a robust and credible Construction Traffic Management Plan.
- 20. The RBKC Chelsea (KC4) air pollution monitoring site, just a few hundred yards from the proposed site on the King's Road, has repeatedly reported nitrogen dioxide limits that have exceeded the statutory limit of 40μg/m3. Indeed, during 2019 the last year before the pandemic nitrogen dioxide levels exceeded this limit every month in some months by more than 60%, as shown below.



- 21.Even during the pandemic and lockdown, the RBKC Chelsea (KC4) site reported nitrogen dioxide limits that exceeded the limit. The average level for the last six reported months, from November 2020 to April 2021, was above 40μg/m3.
- 22. We have additional concerns about the loss of the amenity of a full range Marks & Spencer that has ample parking for the elderly and vulnerable, and its replacement largely by office space (we note that the first floor and above would be office space).
- 23. We would like to draw attention to Council Policy CL1, Context and Character, which states that the Council will require all development to respect the existing context, character and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive for all.
- 24. We are surprised that the contemplated damage to surrounding conservation areas, and risk of environmental harm, would be incurred primarily for the sake of extra office space. Barclays analysts estimate that, following the pandemic, there is 22.5 million square feet of available office space in London the most in almost 20 years with the potential for another 22 million square feet to come onto the market in the next 18 months (source: *The Times*, 24th April 2021).
- 25. We recognise Council Policy CL2 Design Quality, which states that the Council will require all development to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions. We acknowledge that benefits may accrue from improvements to the site.
- 26. However, we believe that the maximum good for the maximum number of constituencies will result from a lower building that is more visually harmonious and less harmful to build and operate.
- 27. We urge the Council to deny this application and instead encourage the applicant to revise its plans in light of point 26.