Representations received by the Royal Borough of Kensington and Chelsea Lots Road Conservation Area – Consultation Period ended 15 April 2013

	Name	Organisation/ Address (where given)	Representation	Summary/Key points	Council Response
1	Ruby Lawson		I am delighted that this has been proposed and I fully support the plan as outlined. I have long looked at other Conservation areas within the Borough and wondered why an area like ours-where I have lived for over 30 years had not been brought under the conservation designation. I know this has been largely down to the hard work of the local Resident's group to whom I am very grateful. Many thanks. I do hope this proposal is implemented.	• In favour (1)	Support noted
2	Adam James		I am broadly in favour of the proposal to designate the area where I live as a conservation area. However I think you should include a traffic plan for these narrow Victorian streets. The east west section of Lots rd along the river has become a very busy commuter rd used by all types of four and two wheeled transport. It is used day and night by black cabs and licensed taxis as a rat run through to Chelsea harbour. In my opinion this road is entirely unsuitable for this use. The situation is getting worse with the works traffic using the road to get to the lots rd power station site. This section of lots rd off cheyne walk, is by any measure a hazardous stretch of road. It is narrow with vehicles parked both sides. The road is curved, which severely reduces visibility. The danger is increased by the fact there are four side roads along its length which are continually used by the taxis. I have spoken to the construction site manager responsible for the large scale development of the power station site. He shares my concerns with regard to this part of lots rd. However he told me there is no contractual obligation on Hutchison to make improvements to the highway to accommodate more traffic. I was told 'its up to the council'. Mr Turner, I think your colleagues in Highways planning need to take this opportunity to move from watch and wait to a proactive plan to improve this section of lots rd. Now I understand local authorities budgets are under extreme pressure and highways aren't a priority. So, I have some low cost, even revenue raising proposals to make which will reduce non essential traffic in lots rd and the streets included in the conservation area. 1. Stop all taxis from joining lots rd from cheyne walk and any of the four side streets along the east west section. The taxis can reach Chelsea harbour via the north south section of lots rd. This section is far safer. It is straight with only one side rd and is already used by the C3 bus.	Broadly in favour (2) Should include traffic management (particularly for construction) Stop taxis from using Cheyne Walk and Lots Road	 Stopping Taxis from joining Lots Road from Cheyne Walk. This would be impossible to enforce and there is no strong justification for it from the accident record or traffic volumes. 20 MPH Speed Limit: The number of accidents is not high for the road and for those accidents that have occurred there is no treatable pattern and certainly no link to speeding. Officer observations are that vehicles do not travel at a speed unusual for the road and there is no justification for a 20mph speed limit. Speed Cameras: We do not use speed cameras in the borough. We have secured via S106 some substantial transport and streetscape improvements to the Lots Road area but the triggers to these have not yet been met. There is no plan for an area management plan.

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			2. 20mph speed limit. 3. Speed cameras.		
3	Francesca Barker	Natural England	Thank you for the consultation on the proposed Lots Road Conservation Area. Natural England does not consider that this Conservation Area poses any likely or significant risk to those features of the natural environment for which we would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.	No comments on proposals	Council is content with Natural England's conclusions.
4	Jo Sherrard	CRA	Thank you for your email. Regarding the delivery of the consultation papers I know that Michelle did not receive hers but her neighbour received two copies so that was sorted out. I have not received any papers but I now realise that this is probably due to the fact that the two attractive houses in Burnaby Street – nos 44 and 46 – are lumped in with Pooles Lane and excluded from your boundary as are the period buildings opposite. If so this is one of the reasons why we feel the newly proposed boundaries are not acceptable. Please may we suggest that if the area is designated, that it is subject to amendments to the boundaries as detailed in the consultation letter. It is a major concern to many residents that the buildings along Lots Road and the other developments have been omitted from the proposed boundaries of the new conservation area as these may be redeveloped in the future. If these were included now it would offer the new conservation area better protection as it is our understanding that demolition within a conservation area is more controlled. One of our concerns is that even though particular buildings or developments may not be of architectural merit, those who are living within the conservation boundary and look out on those buildings which are excluded would have little protection from proposed future development. We would like the name of the conservation area to be "Lots Village Conservation Area" as CRA held a vote at our last AGM. The majority of residents within the proposed conservation area were invited to the meeting and an agenda was also circulated. Conservation was the main topic discussed along with choosing a new name, partly in anticipation of becoming a conservation area, and "Lots Village" was chosen as the new name by a sizeable majority. We were taken unawares by the consultation papers but it is the boundary alterations that have been made and produced in those papers which are most concerning – to include the Shell Garage but not some of the other buildings needs further a	Would prefer name to be Lots Village Conservation Area Boundary issues – Should exclude garage, should include 44-46 Burnaby Street Broadly in favour (3)	 The Council has considered your comments in regard to the wider setting of the proposed Conservation Area. English Heritage guidance on Conservation Area Designation states that 'before finalising the boundary it is worth considering whether the immediate setting also requires additional controls as a result from designation.' The Council accepts that the Lots Road Power Station and the employment uses to the south and west of Lots Road are integral constituents of the historic and architectural interest of the area and will therefore be included within a wider boundary designation. The Council proposes to amend the boundary of the proposed conservation area to include No.s 44-46 Burnaby Street within a wider boundary, which reflects the historic and architectural interest of the Lots Road area. The amended boundary will be defined by physical features in line with best practice (see EH, understanding place, Paragraph 2.2.26). The exclusion of the Shell petrol garage within a wider boundary is

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					considered to be impractical. A conservation area designation will offer opportunities to enhance the impact of negative features within the boundary designation through the management plan. • The Council will name any future Conservation Area the 'Lots Village Conservation Area' in line with resident's wishes. This title reflects how residents understand their area - highlighting its locally distinctive sense of place.
5	Michael van de Vyver	Martin & Co. Chelsea & Riverside, Cremorne Road	We are in favour of this area becoming designated. The area seems to have been forgotten and is very much loved by residents and is clearly going through some exciting changes with the power station and Imperial Wharf train station. We feel ALL the buildings in the area should be covered (eg Pooles Lane) and the conservation area will help protect the Victorian identity and stop developers from distorting the architecture. Please let me know if we can help with any further comment.	 In favour (4) Would include Pooles Lane 	The Council agrees that a wider designation bounded by the physical features and including Lots Road Power Station will incorporate the special architectural and historic interest of the Lots Road area. The Council will conduct an appraisal of the area in January and February, which will be available for public comment before any official designation. (For proposed amended boundaries see map).
6	Deborah Cook	Edith Grove	We are in favour of the proposed Lots Road conservation area and would like to see it agreed.	In favour (5)	Support noted
7	Warwick Jessup	Cornwall Mansions, Cremorne Road	Grounds for objection The Council says it considers that the area has special architectural and historic interest, but what is the special architectural interest? Much of the area consists of Victorian artisan housing having no particular architectural merit. It also includes two undistinguished mansion blocks, and a modern utilitarian social housing block of which no mention is made. SURELY CORNWALL MANSIONS AND ASHBURNHAM MANSIONS AS WELL AS THE MODERN BLOCK BETWEEN THESE MANSION BLOCKS SHOULD BE EXCLUDED FROM THE CONSERVATION AREA IF IT WERE TO GO AHEAD. THESE BLOCKS HAVE NO SPECIAL AND HISTORIC INTEREST AND ARE CUT OFF FROM THE LOTS	 Opposed (1) Area lacks special architectural or historic interest Should remove contemporary blocks Restrictions on property owners to improve and 	 The Council considers the area has special architectural interest as a working community in south Chelsea centred on the Lots Road Power Station. The Council will conduct a conservation area appraisal prior to any formal designation. This will analyse a wider boundary (see map) that reflects the historic function and architectural

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		ROAD AREA BY THE ONE WAY TRAFFIC SYSTEM. The only building with historical interest in the locality is Lots Road Power Station, which is largely excluded from the Proposal and is in any event Grade 2* listed. The conservation area would create restrictions on the freedom of landowners to improve and develop their properties. This would lead to sterilisation of the area, which can only detract from its future enhancement and improvement. Central Government planning guidance indicates that buildings in conservation areas should be subject to the same regime as listed buildings for many purposes. Which, if any, buildings in the area would the Council consider worthy of listing? Undue restrictions on development can be imposed through designation as a Conservation Area, without the Council taking the trouble to investigate the merit of individual buildings. The Delegated Decision Report (para 2.1) reveals that the proposal is not an initiative of the Planning Department, but of one Councillor, some individual residents and the Cremorne Residents' Association. The official reaction (para 2.2), following a site visit by officers, was not overenthusiastic: 'this area could be said to be of special architectural and historical interest. It may be, therefore, desirable to preserve and enhance the character of the area'. At para 3, the restrictions imposed by Conservation Area status are mentioned, specifically that roof extensions are not permitted development (PD) and the size of rear and side extensions which are PD is reduced. It contains a clear threat that roof extensions (not common locally) will be refused consent. Para 6.2 deals with financial implications, and states that 'there are no significant financial implications for the Council'. It also, importantly, notes 'There are financial implications for property owners and those wishing to develop land in the area.' The Preliminary Application for Conservation Area Status is available as Appendix 2 to the Delegated Decision Report. It was prepared by a res	develop properties would sterilise the area • Financial implications for property owners	interest of the area. The objective of this is to understand and articulate why the area is special and what elements within the area contribute to its special quality. This appraisal will be made available for public comment. • A conservation area designation would not seek to prohibit change but ensure that any change that does happen is of a high quality and sympathetic to the historic character of the Lots Road area. This will have positive overall impacts for the area and residents. • English Heritage has conducted research on the effects on house prices in conservation areas. The main findings are outlined below: • People value living in conservation areas sell for a premium of 23% on average. A premium of around 9% exists even after adjusting for other factors that affect house prices such as location and type of property. This adjusted premium was lower for conservation areas deemed to be "at risk", being approximately 5%. • Conservation areas have had stronger house price appreciation than other areas On average, property prices inside conservation areas have had stronger house price appreciation than other areas On average, property prices inside conservation areas have had stronger house price appreciation than other areas On average, property prices inside conservation areas have had stronger house price appreciation than other areas On average, properties elsewhere by 0.2% a year. • Properties closer to the centre of conservation areas sell for

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		This being the case, we do not accept that the additional restrictions on development and associated costs to property owners implicit in Conservation Area status can outweigh the current satisfactory position. The Application makes a very good case for a Conservation Area having been designated 150 years ago, but given the variable development since then we do not consider that it can be justified at the present time. Planning Law We would first quote paragraph 127 of the National Planning Policy Framework: '127. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.' In our view, the character of the area does not justify designation, and would devalue the concept. The Council should heed this guidance. The Planning (Listed Buildings and Conservation Areas) Act 1990 contains the relevant legislation. We have remarked above that the treatment of buildings within Conservation Areas as if they were listed applies for many purposes: specifically, sections 7 to 26, 28, 32 to 46, 56, 62 to 65, and 66(1) applying to Listed Buildings are applied to buildings within Conservation Areas. These include in particular demolition and the power to issue listed building enforcement notices. We repeat the question asked above (not wholly rhetorically) which buildings in the area would the Council consider fit to be listed? Conclusion We fully accept the good faith of those fellow-residents who wish to improve and enhance the character of the area, and we should like to see these aims pursued. However, we do not consider that the nature of the area, one of mixed development of varying ages, types, and merit, justifies designation as a Conservation Area. We consider that such a designation would run counter to government guidance quoted above, and the financial and other burd		The premium for living towards the centre is approximately double that at the edge controlling for other factors, suggesting that people value being surrounded by a greater density of heritage. People value living near to conservation areas There is also a premium (albeit less) for properties outside conservation areas being more closely located to a conservation area. This premium is found to decline from the boundary of the areas and becomes 0 at around 500-700m distance. http://www.english-heritage.org.uk/professional/research/social-and-economic-research/value-conservation-areas/ Designation of the Lots Road Area as a conservation area was raised in the Council's Core Strategy in 2010 (see, Core Strategy, 2010, Chapter 18). English Heritage guidance encourages community involvement. It is increasingly the case that residents are initiating conservation appraisals and their work adds depth to the local authority view. Projects initiated by the community should not be interpreted as lacking local authority support. The statute in relation to conservation areas is set out in Part II of the Planning (listed Buildings and Conservation

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					Areas) Act 1990 – Sections 69-80. This is distinct from those sections concerning listed buildings. The designation of a conservation area will; introduce a requirement in legislation and national planning policies to preserve and/or enhance, control demolition of unlisted buildings, protect trees, mean fewer types of advertisements which can be displayed with deemed consent and restrict the types of development which can be carried out without the need for planning permission.
8	Kerry Davis- Head		Initial comments: As an officer of the local residents association, cremorne residents' association of lots village I am just making a personal initial comment as a resident. As a body we will be commenting in more detail in due course. My personal view: Firstly, the delegated decision report still contains the error regarding lots power station being listed. Sadly it is not. It is the pumping station that is listed, and I believe is included in your boundary map? As a household we are rather disappointed at the proposed boundary: It would seem that householders that would be prevented from making even quite minor alterations to their own homes would be looking onto buildings having no restrictions. That does not seem to be democratic. issues such as building height, upvc replacement windows, demolition etc would not be addressed as a whole and the historic timeline of the area could be lost Whilst some post war developments are excluded, others are included. We would prefer the vast majority of buildings to be included to prevent detrimental development in the whole Lots Village area. the majority of post war buildings came about because of enemy bombings during ww2 and although not all of them are attractive, they could be made even less attractive by unsympathetic replacement windows or disharmonious roof light schedules.	Disappointed by the boundary Erratic choice of buildings within area. Caple House and Chelsea Academy are excluded whilst a petrol station is included Would prefer all post-war buildings included to prevent them from becoming more unattractive Restrictions would be too onerous In favour (6)	 The listed pumping station is included within the boundary of the conservation area. The Council accepts that a wider boundary drawn along the physical boundaries of the Lots Road area and including the historic waterside buildings, commercial businesses and power station would reflect the historic and architectural interest of the area. The Council proposes that a conservation area appraisal will be produced in January and February next year, which will form the evidence base for a future designation.

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			Some very worthy Pre war developments are excluded, namely the Guinness trust buildings (caple house site) a very good example of between war design by c s Joseph. A small Victorian terrace is excluded. Some business buildings are excluded even though they are typical of the area and have historical value as the area is a unique mix of residential and business use. Our most modern building, the chelsea academy, is excluded. And yet this is an award winning modern development which would be scarred by ad hoc alterations or increased height (we are aware the school is pushed for space) A few Victorian buildings have been included whilst a petrol station site is included. Our personal opinion is that it should be all or nothing. To create pockets would create disharmony and not preserve the whole "village" from unwanted developments		
9	Isabelle Manevy	Burnaby Street	We welcome the idea of a conservation area.	In favour (7)	Noted
10	Sonia Richardson	Lots Road	Thank you for the notification that the Council is proposing to designate the Lots Road area as a Conservation area. I am in support of the proposal as I do think this area has a unity of buildings and special architectural and historical significance. I do hope that our wonderful local park, Cremorne Gardens, will also be preserved and that the unsightly damage done to the Power Station and the area next to it which has left residents and all who use the area with a continuing vista that looks like the aftermath of the London Blitz will be resolved very soon. Perhaps the status of an adjacent Conservation will help with these ongoing issues? I would like to reinforce this as the park, Cremorne Gardens, Chelsea Wharf and the Lots Road Power Station are clearly also part of the local Victorian heritage and I strongly believe should be seen as part of the Conservation area.	Would like to see the inclusion of Cremorne Gardens, Chelsea Wharf and Lots Road Power Station due to its contribution to area's Victorian heritage.	The Cremorne Gardens are already within the Thames Conservation Area so they cannot be part of the proposed conservation area. The Council accepts the role that Chelsea Wharf and Lots Road Power Station contribute to the special architectural and historic interest of the area. As a consequence the Council proposes to designate a wider area encompassing those areas mentioned that are not already covered by the Thames conservation area. (see map)
11	Catherine Mitchell	Cornwall Mansions, Cremorne Road	Edith Grove from New King's Road to the Embankment must be one of the most unattractive streets in the Royal Borough but it lies within you conservation area. It is also one of the very few streets that does not have trees growing on it. May I suggest that part of your plans include planting trees along the west side of the street to give it more appeal.	 Does not support the inclusion of Edith Grove Would welcome some tree-planting on the west side of the street 	The Council proposes to produce a conservation area appraisal for the Lots Village Conservation Area. Part of this document incorporates a management plan which will outline enhancement

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					schemes, which may include possible future tree planting projects. The conservation area appraisal will outline the rationale for the designation and chosen boundary while also defining the special architectural and historic interest of the Lots Village area.
12	Jeremy Greenhalgh	Tadema Road	I am wholeheartedly in favour because the terraced houses were well designed and covered an extensive area which is worthy of preservation. Subsequently the industrial buildings were built, which 100 years on are also attractive. The demolition and rebuilding has mostly, I believe, been undertaken by your council – east side of Tadema Road and Uverdale Road south of Burnaby Street, the Academy and the nursery. Limiting your ability to do so in the future is welcome. However I think the area should be extended to what are its natural boundaries – the railway line to the west taking in the Academy and the remaining old buildings near to it, the school and social housing to the north, and the river to the south including the power station.	 In favour (9) Suggests boundary alterations 	The Council accepts that a wider boundary drawn along the physical features of the Lots Road area and including the commercial businesses, the academy and power station would reflect the historic and architectural interest of the area. The Council proposes that a conservation area appraisal will be produced in January and February next year, which will form the evidence base for a future designation. (see map)
13	G Crah	Darmer Terrace	We are vehemently opposed to making this area into a conservation area. It will restrict the sale value of the properties and it is hard enough to sell a property and gain any sort of financial gain on property as it is in the current climate. Should the economy and property market strengthen considerably in the distant future the proposal could be revisited. We absolutely reject this proposal.	Opposed (2) due to potential negative effect on property values	These comments are noted but English Heritage has conducted research on the effects on house prices in conservation areas. The main findings are outlined below: People value living in conservation areas Houses in conservation areas sell for a premium of 23% on average. A premium of around 9% exists even after adjusting for other factors that affect house prices such as location and type of property. This adjusted premium was lower for

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					conservation areas deemed to be "at risk", being approximately 5%. Conservation areas have had stronger house price appreciation than other areas On average, property prices inside conservation areas have grown at a rate that exceeded comparable properties elsewhere by 0.2% a year. Properties closer to the centre of conservation areas sell for more The premium for living towards the centre is approximately double that at the edge controlling for other factors, suggesting that people value being surrounded by a greater density of heritage. People value living near to conservation areas There is also a premium (albeit less) for properties outside conservation areas being more closely located to a conservation area. This premium is found to decline from the boundary of the areas and becomes 0 at around 500-700m distance. http://www.english-heritage.org.uk/professional/research/social-and-economic-research/value-conservation-areas/
14	Ben Hirschfeld	Lots Road	In response to your consultation on the proposed new 'Lots Road Area' conservation area, I am largely in favour of the change in status. However, I see no reason why you have not included Creamore Gardens in the proposed area. Creamore Gardens is an award winning public garden, much cherished by local residents and I strongly believe that if you are going to the trouble of creating a new conservation area then you MUST include Creamore Gardens. Furthermore,	 In favour (10) Would like to see the inclusion of Cremorne Gardens 	The Council accepts the importance of the Cremorne Gardens. However, this is already part of the Thames Conservation Area so they cannot be included in the proposed conservation

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			you have proposed to include Westfield park at the other end of Lots Road so the argument about this solely being about the protection of Victorian terraces is tenuous. I trust that the non-inclusion of Creamore Gardens in the proposal is not due in part to the council's future plans to lease off part of the gardens for access to the Thames Tunnel works.		 A conservation area appraisal will be undertaken prior to any future designation of the Lots Village Conservation area. This will outline the special architectural and historic interest of the wider area.
15	Barbara McCauley and Marcella Roe	Stadium Street	I wish to let you know that we are in fully agreement and with the reasons stated in your letter 26th. Feb. 2013 with the proposal to designate the area shown on the map as a new conservation area. As local residents in this area we are very pleased with this proposal and would strongly recommend that planning permission is approved in order that it may be carried out.	• In favour (11)	Support noted.
16	Kush Kanodia	Lots Road	If our area is designated then we suggest that is subject to amendments to the boundaries. The boundaries proposed are unacceptable as there is a possibility that the buildings along Lots Road and the other developments that have been omitted may be redeveloped in the future. If these were all included now it would offer the new conservation area better protection as it is our understanding that demolition within a conservation area is more controlled. One of our concerns is that even though particular buildings or developments may not be of architectural merit, those who are living within the conservation boundary and look out on those buildings which are excluded would have little protection from future development.	In favour but suggest boundary alterations (12)	 The designation of a conservation area aims to protect and enhance the special architectural and historic interest of an area. The Council accepts that the power station and the commercial premises to the south and west of Lots Road make an important contribution to the historic interest of the area and should be included within the boundary of a future designation. The Royal Borough proposes to undertake further appraisal work in January and February of next year, when additional staffing resources will be available. This work will define the special architectural or historical interest of the Lots Road Area. Once complete this appraisal will be available for public consultation.
17	Vilma Meynell		Thank you very much for your letter regarding the area designated for conservation. I was Chair of our residents association for many years and meetings at the Ashburnham Community Centre before it was demolished. I was	In favour as it will protect green areas (13)	Support noted

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			involved in the objections to the original plans for the power station which seemed totally out of context and against all legal planning regulations. The architect was very very good and all the people involved spent so many hours without any payment to object to this development as did the Royal Borough of Kensington and Chelsea. Knowing how unimportant we all are against the might of property developers I am totally in favour of the conservation area which will protect the green areas we still have.		
18	Phil Lee and Michelle Jackson		We are responding as two individuals from the same household, who share the same opinion. We do not wish our area to be designated so please count this email as two "NO" votes. The report prepared by the Conservation team identifies that our area is a good example of Victorian terraces that were built between 1875 and 1895. The fact that they have been well-maintained for over 100 years suggests that freeholders will continue this trend themselves. Therefore, our view is the benefits do not outweigh the disadvantage of giving up our current permitted planning rights. However, should conservation go ahead, we would like to comment on the proposed boundary. Firstly, all buildings inside the boundary ought be included. The eastern boundary is acceptable. We believe that the southern and western should also include all the buildings on both sides of Lots road (north and south sections). Also, the northern boundary should include Thorndike Close and the Health Centre. We understand that some developments have been excluded because they are not good examples of the types of building that have special architectural or historical interest, but they can be identified accordingly in an appraisal. It is more of a concern that they may be redeveloped in the future, and as demolition within a conservation area has better controls, including them now would provide better protection for the new conservation area. The Report recognises only the 2-3 story Victorian houses as features worthy of protection. However, our area is also an employment zone and has been identified as one with possibilities to develop as a cultural quarter. This is something that is also worthy of protection. There is still potential for major development to Lots Road, therefore, including all those buildings now will help deter developers from proposing any more profitable housing schemes, which will harm the creative character of the area.	 Opposed (3). The properties have been well maintained for over 100 years and therefore CA status is unnecessary Boundary should include both sides of Lots Road and Thorndike Close Should recognise the value of employment zone Favoured name: "Lots Road Village Conservation Area" 	 The designation of a conservation area introduces a requirement in planning policy to protect and/or enhance. A conservation area designation would not seek to prevent change but merely ensure that changes are of high quality and sympathetic to the historic character of the Lots Road area. The Council accepts that a wider boundary drawn along the physical features of the Lots Road area and including the commercial businesses, the academy and power station would reflect the historic and architectural interest of the area as a working community centred on the power station. The Council will name any future conservation area the 'Lots Village Conservation Area' in line with resident's wishes. This title reflects how residents understand their area - highlighting its locally distinctive sense of place.

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			We also have comments on the proposed name of the conservation area. We believe that a better name would be "Lots Village Conservation Area" as the local residents' association, CRA held a vote at their last AGM regarding this matter. The majority of residents within the proposed conservation area were invited to that meeting and "Lots Village" was chosen by a massive majority.		
19	Dr Clive Myer	Chelsea reach, Lots Road	Dear Lots Village Residents and Business Association, Thank you for sending us the email below, which we have studied at great length. At the last tenants meeting I spoke from the floor about the Lots Road area as a potential Creative Industries Hub, as mentioned in part of the RBKC's development plans. At the time I expressed some concern that there could (but not necessarily) arise a conflict of interest between the idea of a conservation area and that of a creative industries hub. I mentioned that we had been here since 1974 and were probably one of the first creative businesses in the Lots Road area, as a group of graduates from the Royal College of Art extending our artistic practices from filmmaking, photography, painting and design. At that time there was no development at all in Lots Road – Pooles Lane was still a group of lived-in post war prefabs, Chelsea Flour Mill was still a working mill and Chelsea Harbour wasn't even a twinkle in a developer's eye and was an operational scrap metal yard! There was a living and working community, few of whom may still be here. The world has moved on, some things for the better and perhaps some things not. However, I do believe we have plenty to celebrate in the development of the educational and working creative industries that have cantered around Lots Road since that time. Chelsea Reach (79/89 Lots Road) will be continuing to support the creative industries but is also keen to support ideas emanating from the local community. As such, we find that the area designated by the RBKC as that suitable for a conservation area is the best one for us and probably other businesses in the area (though I do not suggest that I speak on their behalf). We will be supporting the council's designated area rather than wishing it to be changed to include the designated work areas of Lots Road and shall be writing to them as such.	Envisaged conflict between creative hub and conservation area but supports the proposed boundary as it minimises this conflict. In favour at present (14)	 The designation of Lots Road area as a conservation area would not prevent development (or redevelopment). The goals of preserving and enhancing the historic character of the area and supporting creative industries within Lots Road are not mutually exclusive. A conservation area designation is not a barrier to change but is about managing any future change so that it is sympathetic to character of the area. The Royal Borough proposes to undertake further appraisal work in January and February of next year, when additional staffing resources will be available. This work will define the special architectural or historical interest of the Lots Road area. Support for the proposed boundaries is noted but many other responses to this consultation have made the case for the conservation area to cover a wider area so the appraisal will analyse a wider area that includes the commercial premises south and west of Lots Road (see map).
20	Mrs MJB Sowler, Mrs	Cornwall Mansions,	NOTICE OF OBJECTION	Opposed (4)	The Council proposes to produce a conservation area appraisal

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PEMH Gubb, THJH Sowler, RMGH Sowler	Cremorne Road	We, being home owners potentially affected by the Proposed Lots Road Conservation Area (the Proposal), hereby register our objection to the Proposal. The Notification Letter The Notification Letter is defective in a number of respects. Paragraph 2. The Letter states that the Council considers that the area has special and historic interest, without specifying the reasons for such view. In particular, what is the special architectural interest? Much of the area consists of run-of-the-mill late Victorian artisan housing having no particular architectural merit. Moreover, the area is described as a group of Victorian terraces, whereas it also includes two undistinguished mansion blocks, and a modern utilitarian social housing, of which no mention is made. Further, no indication is given of the special historical interest. The only building of historical interest in the locality is Lots Road Power Station, which is largely excluded from the Proposal and is in any event already Grade 2* listed. The Council gives no reasons for its views. Paragraph 3. This paragraph sets out supposed advantages of the Proposal, but does not mention (and nor does any other part of the Letter) the disadvantages. These disadvantages include, but are not limited to, restrictions on the freedom of home owners to improve and develop their properties, and the risk of sterilisation of the area, which can only detract from its future enhancement and improvement. The objectors mention here (and will enlarge upon the point below) that Central Government planning guidance indicates that buildings in conservation areas should be subject to the same regime as listed buildings for many purposes. Which, if any, buildings in the area would the Council consider worthy of listing? Undue restrictions on development can be imposed through designation as a Conservation Area, without the Council taking the trouble to investigate the merit (or otherwise) of individual buildings. Online Planning Consultations Content The Delegated Decision Report (pa	Does not support the view that there is special architectural interest. Considers there to be a lack of justification Questions the special architectural value of the area Restrictions are too onerous. Contrary to the NPPF guidance	prior to any formal designation outlining the special architectural and historic character of the area. Not all elements within a conservation area will necessarily contribute to the character of an area. A conservation area appraisal offers the opportunity to outline opportunities for beneficial change to enhance the character of the Lots Road area. The Council accepts that whilst not listed, the Lots Road Power Station makes an important contribution to the special architectural and historic interest of the wider area and should be included in a future designation. English Heritage has conducted research on the effects on house prices in conservation areas. The main findings are outlined below: People value living in conservation areas sell for a premium of 23% on average. A premium of around 9% exists even after adjusting for other factors that affect house prices such as location and type of property. This adjusted premium was lower for conservation areas deemed to be "at risk", being approximately 5%. Conservation areas deemed to be "at risk", being approximately 5%. Conservation areas have had stronger house price appreciation than other areas On average, property prices inside conservation areas have had stronger house price appreciation than other areas On average, property else elsewhere by 0.2% a year.

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		The official reaction (paragraph 2.2), following a site visit by officers, was not overenthusiastic: 'this area <i>could be said</i> to be of special architectural and historical interest. <i>It may be,</i> therefore, desirable to preserve and enhance the character of the area'. (Our emphasis.) Paragraph 2.3 concedes that 'there is certain variety in the townscape' and that 'The area comprises a diverse mix of uses and building typologies', but then continues to indicate that the Grade 2* listed Lots Road Power Station is within the area, whereas, in fact, it is generally outside the boundary on the plan. It is not a compelling endorsement of special architectural or historic interest. Paragraph 2.4 refers to other nearby Conservation Areas and notes that the 'area relates to development of a different architectural period and character than the existing surrounding Conservation Areas', suggesting that it does not have a similar historical or architectural importance. At paragraph 3, the restrictions imposed by Conservation Area status are mentioned, specifically that roof extensions are not permitted development (PD) and the size of rear and side extensions which are PD is reduced. It contains a clear implication that roof extensions (not yet common locally) will be refused		 Properties closer to the centre of conservation areas sell for more The premium for living towards the centre is approximately double that at the edge controlling for other factors, suggesting that people value being surrounded by a greater density of heritage. People value living near to conservation areas There is also a premium (albeit less) for properties outside conservation areas being more closely located to a conservation area. This premium is found to decline from the boundary of the areas and becomes 0 at around 500-700m distance.
		Paragraph 6.2 deals with financial implications, and states that 'there are no significant financial implications for the Council'. It also, importantly, notes 'There are financial implications for property owners and those wishing to develop land in the area.' This important consideration must be balanced against other relevant issues. The Preliminary Application for Conservation Area Status is available as Appendix 2 to the Delegated Decision Report. It was prepared by a resident for the Residents' Association and gives an admirably clear and concise history of the area. We would point out that the area described in the Application and that shown on the plan enclosed with the Notification Letter differ slightly, but we do not think that much hangs on this. We note that changes in the boundary would be desirable to exclude particular parts of it (for example, the mansion blocks) and specific buildings if the area is designated. The Application notes (pages 7 and 8) that 'Council planning permission has been empathetic to the character of the area as well as the wishes of the residents' and		http://www.english-heritage.org.uk/professional/research/social-and-economic-research/value-conservation-areas/ The Council will ensure that all public comments and our responses are available on the Council's website for the public to view. The Council will seek resident's views on the appraisal work undertaken prior to any future designation. Designation of the Lots Road Area as a conservation area was raised in the Council's Core Strategy in 2010 (see, Core Strategy, 2010, Chapter 18). English Heritage guidance
		that 'improvements, including additions – including in back garden areas as well as loft extension, and most recently basement excavation – have been permitted.' This being the case, we do not accept that the additional restrictions on		encourages community involvement. It is increasingly the case that residents are initiating

lr	Name	Organisation/ Address (where given)	Representation	Summary/Key points	Council Response
			development and associated costs to home owners implicit in Conservation Area status can outweigh the current satisfactory position. The Application makes a very good case for a Conservation Area to have been designated 150 years ago, but given the variable development since then we do not consider that it can be justified at the present time. Planning Law We would first quote paragraph 127 of the National Planning Policy Framework: '127. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.' The character of the area does not justify designation, and would devalue the concept. The Council should heed this guidance. The Planning (Listed Buildings and Conservation Areas) Act 1990 contains the relevant legislation. We have remarked above that the treatment of buildings within Conservation Areas as if they were listed applies for many purposes: specifically, sections 7 to 26, 28, 32 to 46, 56, 26 to 65, and 66(1) applying to Listed Buildings are applied to buildings within Conservation Areas. These include in particular demolition and the power to issue listed building enforcement notices. We repeat the question asked above (not wholly rhetorically) which buildings in the area would the Council consider as of sufficient merit to qualify for listing? Conclusion We fully accept the good faith of those fellow-residents who wish to improve and enhance the character of the area, and we should like to see these aims pursued, but without the restriction on home owners' development aspirations and the additional costs to them which this would involve. However, we do not consider that the nature of the area, one of mixed development of varying ages, types, and merit, justifies designation as a Conservation Area. We consider that such a designation would run counter to		conservation appraisals and their work adds depth to the local authority view. Projects initiated by the community should not be interpreted as lacking local authority support. • A conservation area designation does not seek to restrict development but is designed to ensure that any development that does take place preserves or enhances the character of the area. • The statute in relation to conservation areas is set out in Part II of the Planning (listed Buildings and Conservation Areas) Act 1990 – Sections 69-80. This is distinct from those sections concerning listed buildings. The designation of a conservation area will; introduce a requirement in legislation and national planning policies to preserve and/or enhance, control demolition of unlisted buildings, protect trees, mean fewer types of advertisements which can be displayed with deemed consent and restricts the types of development which can be carried out without the need for planning permission.
21	Wendy Orr	Stadium Street	Having looked at the proposal, it seems to be a good idea, and I would support it, and thank the Council for putting forward the idea and going out to consultation.	In favour (15)	Support noted

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22	Jane Goff	Studio 10, 92 Lots Road	I would like to express strong objection to the proposed designation of a new Conservation Area in Cremorne Ward and also in particular to the inclusion of 92 Lots Road within it. My objection concerns both the procedure of the proposal and also the substance of the designation. I would outline the detail of my objection below: 1. Lack of Special Architectural or Historic Interest My view is that the area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building which is an example of industrial architecture rather than the residential attributes to which you refer. The streets of Victorian terraces contain largely unremarkable residential properties which are common to this part of London and these are interspersed with various post-war developments of little or no aesthetic merit. 2. Appraisal I understand that there has not been any proper independent assessment of the area to inform the consultation and that the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. The consultation and designation process is therefore being developed without reliable evidence and an adequate information base. I find that there is insufficient information to be able to gain a proper understanding of the reasons for your proposed designation of the area which makes it impossible to have a meaningful part in the process. 3. Inappropriate Boundary The boundary shown on the map does not appear logical to me because it includes properties of varying dates and designs and therefore lacks coherence. The property at 92 Lots Road is a commercial development dating from the 1980s. It has been included within the boundary although it is obviously from a different period and does not relate to the design of the residential terraces or the character of the area. It appears to me that the designation of this boundary has been made witho	 Opposed (6) Area lacks special architectural or historic interest Lack of appraisal No independent assessment of the area to inform the consultation. Proposal is without reliable evidence base. Inappropriate boundary: lack of a proper independent assessment has contributed to the illogical designation of the boundary 	 While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council has concluded that the boundary consulted on should be amended to include a wider area, which will incorporate the commercial premises south and west of Lots Road including the power station (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area.

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			I wish to register a strong objection to the Council's proposed designation of the Conservation Area for the reasons outlined above. I would ask that you properly consider my objection and keep me informed of your on-going proposals and processes at each future stage. Please notify me of your receipt of this objection and provide me with information as to how you will be considering it in relation to any formal decision on your proposal.		
23	Richard Burn	Unit 7, 92 Lots Road	OBJECTION TO PROPOSED DESIGNATION OF LOTS ROAD CONSERVATION AREA In response to your letter of 26 February 2013, I am writing to express strong objection to the proposed designation of a new Conservation Area in Cremorne Ward. This objection concerns both procedural and substantive matters and is made for the following reasons: Absence of Appraisal The current consultation has not been informed by any proper assessment of the area. Instead, the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. The consultation and designation process is therefore proceeding without any sound or reliable evidence base, and with insufficient information for those affected by the proposal to understand or play a meaningful role in the process. Lack of Special Architectural or Historic Interest The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building - an example of industrial architecture – while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Inappropriate Boundary The boundary shown on the map does not constitute a coherent area for designation. The property at 92 Lots Road is a development dating from the 1980s that adds nothing to the character of the area, yet it has been drawn within the boundary without justification. The current boundary is in my view symptomatic of the more fundamental lack of proper consideration given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.	Opposed (7) Absence of Appraisal Lack of Special Architectural or Historic Interest Inappropriate Boundary	 While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council concludes that the boundary consulted on should be amended to include a wider area, which will incorporate the commercial premises south and west of Lots Road including the power station (see map). This boundary includes a number of

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					buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area.
24		Cremorne Residents' Association	If our area is designated as a conservation area, then we suggest that it is subject to amendments of the boundaries. The boundaries proposed are unacceptable as there is a possibility that the buildings along Lots Road and the other developments that have been omitted may be redeveloped in the future. If these were all included now it would offer the new conservation area better protection as it is our understanding that demolition within a conservation area is more controlled. One of our concerns is that even though particular buildings or developments may not be of architectural merit, those who are living within the conservation boundary and look out on those buildings which are excluded would have little protection from future development. We suggest that the southern and western boundaries ought to include all the buildings on both sides of Lots road (north and south sections). Equally, the northern boundary should include Thorndike Close and the Health Centre. Also to include all buildings within our suggested boundary, particularly the two Victorian houses at 44 and 46 Burnaby Street. We understand that some developments were deliberately excluded because they are not good examples of the types of building that have special architectural or historical interest, but they can be identified accordingly in an appraisal. The Proposed Designation Report only recognises the 2-3 story Victorian houses as features worthy of protection. However, our area is also an employment zone and has been identified as one with possibilities to develop as a cultural quarter. This is something that is also worthy of protection, and as there is still potential for major development on Lots Road, including all those buildings now will help prevent developers from proposing any more profitable housing schemes, which will harm the creative character of the area. We also suggest that a better name for the new conservation area would be "Lots Village Conservation Area". At our last AGM held in October 2012 we invited the majorit	 In favour (16) Suggests boundary changes Should include buildings along Lots Road, Thorndike Close, 44-46 Burnaby Close. Should rename CA: "Lots Village Conservation Area" 	 The Council have considered your comments in regard to the wider setting of the proposed Conservation Area. English Heritage guidance on Conservation Area Designation states that 'before finalising the boundary it is worth considering whether the immediate setting also requires additional controls as a result from designation.' It is the view of the Council that the employment uses and Lots Road Power Station to the south and west of Lots Road are integral constituents of the historic interest of the proposed area and will therefore be included within a wider boundary designation. (see map) The Council proposes that a conservation area appraisal will be produced in January and February next year, which will form the evidence base for a future designation. This will be available for public comment prior to any formal designation. A Conservation area designation does not prohibit new development but ensures that any future development complements the character and appearance of the wider area. The Council will name any future Conservation Area the 'Lots Village Conservation Area' in line

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					with resident's wishes. This title reflects how residents understand their area - highlighting its locally distinctive sense of place.
26	Ben Sellers	Owner of Units 14 & 15, 92 Lots Road	In response to your letter of 26 February 2013, I am writing to express strong objection to the proposed designation of a new Conservation Area in Cremorne Ward. This objection concerns both procedural and substantive matters and is made for the following reasons: Absence of Appraisal The current consultation has not been informed by any proper assessment of the area. Instead, the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. The consultation and designation process is therefore proceeding without any sound or reliable evidence base, and with insufficient information for those affected by the proposal to understand or play a meaningful role in the process. Lack of Special Architectural or Historic Interest The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building - an example of industrial architecture – while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Inappropriate Boundary The boundary shown on the map does not constitute a coherent area for designation. The property at 92 Lots Road is a development dating from the 1980s that adds nothing to the character of the area, yet it has been drawn within the boundary without justification. The current boundary is in my view symptomatic of the more fundamental lack of proper consideration given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.	Opposed (8) Absence of Appraisal Lack of Special Architectural or Historic Interest Inappropriate Boundary – should exclude 92 lots road	 While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council concludes that the boundary consulted on should be amended to include a wider area, which will incorporate the commercial premises south and west of Lots Road including the power station (see map). This boundary includes a number of

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				buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area.
27 Michael Foy	Studio Eight 92 Lots Road	I am a business premises owner at 92 Lots Road. I object most strongly to the Designation on the following grounds: — it is inappropriate for the Council to make a designation without an independent appraisal — the proposed area lacks special architectural or historical interest — 92 Lots Road is an unattractive, modern development that contributes nothing to the adjacent area's character Notwithstanding my fundamental objection to the proposed Conservation area, there clearly would have to be a more logical boundary, which would exclude 92 Lots Road.	Opposed (9) • Area lacks architectural interest. • Incorrect boundary – should exclude 92 Lots Road	While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. Conservation Area designation is not a barrier to development. Not all elements within a conservation area will contribute to the character and appearance of the wider area. A conservation area appraisal offers the opportunity to channel development pressure in a way that conserves the special quality of the conservation area.
28 Anthony Forbes	92 Lots Road	OBJECTION TO PROPOSED DESIGNATION OF LOTS ROAD CONSERVATION AREA In response to your letter of 26 February 2013, I am writing to express strong objection to the proposed designation of a new Conservation Area in Cremorne	Opposed (10) Absence of Appraisal Lack of Special	While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance <i>Understanding Place</i> :
	•	•	S CONSERVATION AREA	CONSERVATION AREA In response to your letter of 26 February 2013, I am writing to express strong objection to the proposed designation of a new Conservation Area in Cremorne Lack of Special

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	(where given)	made for the following reasons: Absence of Appraisal The current consultation has not been informed by any proper assessment of the area. Instead, the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. The consultation and designation process is therefore proceeding without any sound or reliable evidence base, and with insufficient information for those affected by the proposal to understand or play a meaningful role in the process. Lack of Special Architectural or Historic Interest The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building - an example of industrial architecture – while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Inappropriate Boundary The boundary shown on the map does not constitute a coherent area for designation. The property at 92 Lots Road is a development dating from the 1980s that adds nothing to the character of the area, yet it has been drawn within the boundary without justification. The current boundary is in my view symptomatic of the more fundamental lack of proper consideration given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.	Interest Inappropriate Boundary — should exclude 92 Lots Road	Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council concludes that the boundary consulted on should be amended to include a wider area, which will incorporate the commercial premises south and west of Lots Road including the power station (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area. Conservation area designation is not a barrier to development. Not all elements within a conservation area will contribute to the character and appearance of the wider area. A conservation area appraisal offers the chance to outline opportunities to enhance an area to channel

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					development pressure in a way that conserves the special quality of the conservation area.
29	Frederick Pearson	Unit G 92 Lots Road	OBJECTION TO PROPOSED DESIGNATION OF LOTS ROAD CONSERVATION AREA In response to your letter of 26 February 2013, I am writing to express strong objection to the proposed designation of a new Conservation Area in Cremorne Ward. This objection concerns both procedural and substantive matters and is made for the following reasons: Absence of Appraisal The current consultation has not been informed by any proper assessment of the area. Instead, the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. The consultation and designation process is therefore proceeding without any sound or reliable evidence base, and with insufficient information for those affected by the proposal to understand or play a meaningful role in the process. Lack of Special Architectural or Historic Interest The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building - an example of industrial architecture – while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Inappropriate Boundary The boundary shown on the map does not constitute a coherent area for designation. The property at 92 Lots Road is a development dating from the 1980s that adds nothing to the character of the area, yet it has been drawn within the boundary without justification. The current boundary is in my view symptomatic of the more fundamental lack of proper consideration given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.	 Opposed (11) Absence of Appraisal Lack of Special Architectural or Historic Interest Inappropriate Boundary - Should exclude 92 Lots Road 	 While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council concludes that the boundary consulted on should be amended to include a wider area, which will incorporate the commercial premises south and west of Lots Road including the power station (see map). This boundary includes a number of buildings which contribute to the

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31	John Rendall	Chairman World's End Resident Association	I would like the Borough to refuse the current proposal for a newly designated conservation area in the Lots Road Triangle unless it includes the only two buildings of merit and status ie the Grade 2 listed Thames Water Pumping Station and the RBKC owned Cremorne Wharf. The wharf has recently been reviewed by Boris Johnson, the Mayor of London, to safeguard that this status remains.	In Favour (18) providing the Grade 2 listed Thames Water Pumping Station and the RBKC owned Cremorne Wharf are included	The London County Council Pumping Station was included in the boundary consulted upon and will be included in the amended boundary, which includes Lots Road Power Station and Cremorne Wharf (see map).
32	Maurice T. Greig	The Greig & Greig Partnership LLP Studio11 92 Lots Road	I am writing to raise an objection to the proposed conservation area as a Partner of The Greig & Greig Partnership LLP of Studio 3, 92 Lots Road and as a Director of Casa Italia Ltd. of Studio 3, 92 Lots Road. Following your circular I have further investigated the tenet of your submission and object to it on the following grounds: 1) The proposed area that is defined in the Council's report does not justify conservation area status within the terms of the National Planning Policy Framework. In particular, the mix of buildings within the proposed area demonstrates neither consistency in terms of architectural style nor noteworthy historic impact. In fact the proposed area includes a wide variety of modified Victorian properties (pleasant enough as homes but of no special architectural or historic interest), 92 Lots Road (built for commercial use in the 1980's but of no particular architectural merit) and the functional but hardly conservation worthy Shell Petrol Station.	Proposed area does not justify conservation area status within the terms of the NPPF no appraisal in accordance with the relevant national guidance; absence of due process or regard for NPPF	While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional

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			report with further boundary modifications determined by the planning officers without recourse to a full appraisal. It seems therefore that the Council is currently not in a position to discharge its duty under Section 69 of the relevant Act. Specifically, the Council has not undertaken an appraisal in accordance with the relevant national guidance; instead submitting a proposal which is inconsistent and unsubstantiated in relation to the overall rationale, the proposed boundary, the status of the power station (it seems it is the pumping station only that is listed) and the selection of other included and excluded buildings. 3) Furthermore given the absence of due process or regard for National Panning Policy requirements, to proceed would undervalue and undermine the concept of genuine conservation status. However, should you see fit to take the matter forward without a full appraisal process, I feel strongly that it would be entirely inappropriate to include 92 Lots Road within any proposed conservation area boundary.		 staffing resources area available. The completed conservation area appraisal will demonstrate if the area is of special architectural and historic interest and therefore any designation will be in conformity with paragraph 127 of the NPPF. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council concludes that the boundary consulted on should be amended to include a wider area, which will incorporate the commercial premises south and west of Lots Road including the power station (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area.
33	Adam Crangle	JCK Limited, Studio 5 92 Lots Road	OBJECTION TO PROPOSED DESIGNATION OF LOTS ROAD CONSERVATION AREA In response to your letter of 26 February 2013, I am writing to express in respect of Unit 9, 92 Lots Road <u>strong objection</u> to the proposed designation of a new Conservation Area in Cremorne Ward. This objection concerns both procedural and substantive matters and is made for the following reasons: Absence of Appraisal The current consultation has not been informed by any proper assessment of the area. Instead, the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. The consultation and designation process is therefore proceeding without any	 Opposed (13) Absence of Appraisal Lack of Special Architectural or Historic Interest Inappropriate Boundary 	While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to

li di	Name	Organisation/ Address (where given)	Representation	Summary/Key points	Council Response
			sound or reliable evidence base, and with insufficient information for those affected by the proposal to understand or play a meaningful role in the process. Lack of Special Architectural or Historic Interest The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building - an example of industrial architecture – while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Inappropriate Boundary The boundary shown on the map does not constitute a coherent area for designation. The property at 92 Lots Road is a development dating from the 1980s that adds nothing to the character of the area, yet it has been drawn within the boundary without justification. The current boundary is in my view symptomatic of the more fundamental lack of proper consideration given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.		outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council conclude that the boundary consulted on should be amended to include a wider area (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area. Conservation Area designation is not a barrier to development. Not all elements within a conservation area will contribute to the character and appearance of the wider area. A conservation area appraisal offers the chance to outline opportunities to enhance an area and channel development pressure in a way that conserves the special quality of the conservation area.
34	Jennie Reuvid	Birley Street	OBJECTION TO PROPOSED DESIGNATION OF LOTS ROAD CONSERVATION AREA In response to your letter of 26 February 2013, I am writing to express my very strong objection to the proposed designation of a new Conservation Area in Cremorne Ward. This objection concerns both procedural and substantive matters	Opposed (14)Absence of AppraisalLack of Special	While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance <i>Understanding Place:</i>

A	Organisation/ Address where given)	Representation	Summary/Key points	Council Response
		Absence of Appraisal The current consultation has not been informed or guided by any proper assessment of the area. Instead, the Council has simply made available information contained in an 'application', prepared it appears in 2011. by some members of the Cremorne Residents' Association. I have read this submission and find it to be muddled and contradictory and for its length surprisingly uninformative and unconvincing. It cannot realistically be presented as an objective and dispassionate assessment as to whether the area selected should be given Conservation Area status. The consultation and designation process therefore appears biased and proceeding without any sound or reliable evidence base, and with insufficient information or indeed opportunity for those affected by the proposal to understand or play a meaningful role in the process. I have an unpleasant feeling that this process is a complete charade decided behind closed doors and the ultimate decision is already a foregone conclusion. Lack of Special Architectural or Historic Interest The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The proposed area, which inexplicably jumps across Lots Road contains only 1 listed building - an example of industrial architecture - while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Again for no apparent reason all the properties west of Lots Road have been excluded from the proposed designation as well as those which seem to be owned or controlled, or partially controlled by RBKC. This is odd as the residents plan is far more comprehensive. There is absolutely no reasoning or justification as to why both these plans differ and because of this lack of transparency one can only assume that whilst a Conservation Area can be imposed in such a cavalier manner on others, RBKC gives	Architectural or Historic Interest Inappropriate Boundary	Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council conclude that the boundary consulted on should be amended to include a wider area (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area. Conservation Area designation is not a barrier to development. Not all elements within a conservation area will contribute to the character and appearance of the wider area. A conservation area appraisal offers the chance to outline opportunities to enhance an area and channel development pressure in a way that conserves the special quality

	Name	Organisation/ Address (where given)	Representation	Summary/Key points	Council Response
0.5	L the second	71	fundamental lack of any proper consideration being given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.	2 145	of the conservation area.
35	Jarman	Thermoengage Ltd, 92 Lots Road	OBJECTION TO PROPOSED DESIGNATION OF LOTS ROAD CONSERVATION AREA I am the CEO of Thermoengage Limited a property investment company. We have owned property at 92 Lots Road for over 16 years and currently own Units 1, 4, 6, A, B, C and K. For many years companies of which I am a shareholder and a Director have occupied these units. Our holding comprises c. 42% of the floor space of the scheme. I am also Chairman of 92 Lots Road Limited, the company which owns the Freehold and manages the scheme for all the local businesses who operate from there. The Freehold company will be making separate and more detailed representations through the offices of our planning consultants Messrs Montagu - Evans. I have read and considered your letter of 26 February 2013, as a result I am writing to express a strong objection to the proposed designation of a new Conservation Area in Cremorne Ward. This objection concerns both procedural and substantive matters and is made for inter alia the following reasons: Absence of Appraisal The current consultation has not been informed by any proper assessment of the area understand that instead the Council has simply made available information contained in an 'application' prepared by some members of the Cremorne Residents' Association. This is not how this process should be initiated and is exclusive rather than inclusive in its outlook and process. As a minimum and as a long standing RBKC ratepayer I would have expected that the Planning Department would have either assessed the suitability of the locality itself for such a designation or appointed an independent consultancy to carry out an objective and detailed survey. The consultation and designation process is therefore seriously flawed and proceeding without any sound or reliable evidence base, and with insufficient information for those parties affected by the proposal to properly understand or play a meaningful role in the process. This cannot in any manner be seen as being fair or proportionate. Lack of Special Architectur	 Opposed (15) Absence of Appraisal Lack of Special Architectural or Historic Interest Inappropriate Boundary 	 While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council conclude that the boundary consulted on should be amended to include a wider area (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic

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			The area you are proposing for designation is not of sufficient architectural or historic interest to warrant Conservation Area status. The area contains only 1 listed building - an example of industrial architecture - while the remaining streets contain largely unremarkable residential properties which are common to West London, themselves interspersed with various post-war developments of little or no aesthetic merit. Inappropriate Boundary The boundary shown on the map does not constitute a coherent area for designation. The property at 92 Lots Road is a development dating from the 1980s that adds nothing to the character of the area, yet it has been drawn within the boundary without justification. The current boundary is in my view symptomatic of the more fundamental lack of proper consideration given to this proposal. For the reasons outlined above, I wish to register a strong objection to the Council's proposed designation of the Conservation Area. Please keep me informed at each further stage of this process and notify me of when any formal decision on this matter will be taken.		function of the Lots Road area. Conservation Area designation is not a barrier to development. Not all elements within a conservation area will contribute to the character and appearance of the wider area. A conservation area appraisal offers the chance to outline opportunities to enhance an area and channel development pressure in a way that conserves the special quality of the conservation area.
36	92 Lots Road Ltd		See Montagu Evans Objection Report and Appendix		While an appraisal prior to designation is not a statutory obligation, the Council recognises that English Heritage Guidance Understanding Place: Conservation Area Designation, Appraisal and Management (2011) states that an appraisal will 'ideally' be prepared prior to the designation of all conservation areas. The Council accept your comments regarding the benefits of an appraisal to outline the special architectural and historic significance of the area. This work will be undertaken in January and February, when additional staffing resources area available. The completed conservation area appraisal will demonstrate that the area is of special architectural and historic interest and therefore any designation will be in

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					conformity with paragraph 127 of the NPPF. The Council proposes to make this appraisal available for public comment for six weeks before Easter with the intention of formally designating the conservation area after the elections. The Council have taken on board your comments regarding the boundary. The Council conclude that the boundary consulted on should be amended to include a wider area (see map). This boundary includes a number of buildings which contribute to the special architectural interest of the area and reflects the historic function of the Lots Road area.
37	Clare Pelham	Lots Road	I am writing to request that the Borough withdraw their current proposal for a newly designated conservation area in the Lots Road Triangle unless such proposal includes the only two buildings of merit and status, which I believe are the Grade 2 listed Thames Water Pumping Station and the RBKC owned Cremorne Wharf. The Thames Water Pumping Station has been designated Grade 2 for many years. Also, the safeguarded status of Cremorne Wharf has been extensively reviewed by Boris Johnson, the Mayor of London with his recommendation that the status of the wharf remain. As you aware, the neighbouring Cremorne Gardens is an existing conservation area. Please could there be details given as to why these two locations were not included in the Borough's plans. Accordingly, I feel the whole proposal should be Refused completely at this stage until consultation and meeting with residents have been undertaken.	In favour (19) providing the Grade 2 listed Thames Water Pumping Station and the RBKC owned Cremorne Wharf are included	 The London County Council Pumping Station was included in the boundary consulted upon and will be included in the amended boundary (see map). The Council accepts the importance of the Cremorne Wharf to the historic interest of the Lots Road area and the Council proposes an amended boundary including both the wharf and the power station (see map).
38	Martyn Baker		I very much welcome the fact that the Council has taken forward the suggestion included in the Core Strategy of designating a new conservation area around the Lots Road part of Cremorne Ward. While supportive of the broad proposal now put forward I believe it would be much better if the boundaries were not so narrowly drawn but paid full regard to the distinctive overall character of this last remaining part of working riverside Chelsea which, as you know, includes Victorian commercial as well as residential property.	In favour (20) Widen boundary to include the wharf and waterfront, "the diner", Chelsea Academy and Heatherly School of Fine Art.	The Council have considered your comments in regard to the wider setting of the proposed conservation area and its historic role. English Heritage guidance on conservation area designations states that 'before finalising the boundary it is worth

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	(where given)	This reflects its historic role which is unique in Chelsea. I therefore urge the Council to expand its proposed boundaries to embrace three specific aspects of this remarkable and diverse area. First, I consider there is in this western end of the Borough a serious gap in the coverage of the Thames Conservation Area (which otherwise includes the entire Chelsea waterfront) and that consequently the historic waterside commercial buildings stretching from Cremorne Gardens to Chelsea Creek should be incorporated within the new conservation area including Chelsea Wharf, Station House (adjacent to the listed Pumping Station) and the turbine halls of the Power Station. Whatever happens to the status of historic Cremorne Wharf (currently still GLA protected) and its intended use pro tem by Thames Water (if their Thames Tunnel project goes ahead) the now largely redundant storage sheds on the wharf should in our view only be redeveloped in full conformity with the Strategic Planning Guidance for the River Thames, in particular by taking full account of its local context, especially the listed Pumping Station, and the protected nature of this employment land. Second, I consider on grounds of architectural merit that the award winning Chelsea Academy and the new home of the historic Heatherly School of Fine Art (founded in 1845) should both be included within the new conservation area, as should the public house, now called the Lots Road Diner, adjacent to the Academy, which is a good example of Victorian vernacular architecture. Third, the inclusion of other smaller commercial buildings adjacent to Lots Road in this well established Employment Zone needs to be seriously considered by the Council in view of its welcome commitment in the Core Strategy to protecting such employment space from developers seeking higher value residential developments through change of use applications. Such wholesale redevelopments although they might include modest amounts of new and so more expensive retail or office space would almost i	Consideration to including smaller industrial units in the Employment Zone	considering whether the immediate setting also requires additional controls as a result from designation.' The Council considers the historic waterside buildings, Lots Road Power Station and commercial premises to the west of Lots Road to be integral constituents of the historic interest of the proposed area and will therefore be included within a wider boundary designation (see map). The Council accepts the Chelsea Academy, Heatherly School of Fine Art, Lots Road Diner contributes to the architectural and/or historic interest of the area and will be included in a wider boundary designation. The Council proposes that a full conservation area appraisal will be produced in January and February next year, which will form the evidence base for a future designation. The purpose of a conservation area is to preserve or enhance an area of special architectural and historic interest and is not designed to protect employment uses. This is achieved through other policies outlined in the Royal Borough's Core Strategy.

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			rigorously segregated, as in so much of residential London.		
			I do hope you will be willing to take these three constructive proposals fully into account.		
39	Jo Sherrard	Burnaby Street	In spite of not having received the consultation letter regarding the Council's plans to make the Lots Road area a conservation area, I would like to make a few comments. I live in Burnaby Street in one of the original houses built in the area – I have certified documents dating back to 1887 – but it has been left out of your amended boundary for the proposed conservation area - I presume is why I was not included in the consultation process. I feel very strongly that if this area is to become a conservation area then it should be "all or nothing". There are two houses on the north side of Burnaby Street, plus the buildings opposite now forming part of the Fairmont Studios, which are built in this style and period - they are unique in the area, but have been excluded. At the same time the buildings along that part of Lots Road are built in the original style of the area – they may now be commercial but they form an important part of the area, and indeed the Lots Road Diner pub on the corner is an iconic building mentioned in the History of the Area. None of these have been included in your amended boundary. I feel that the award winning Chelsea Academy and the Heatherley School of Art should not be excluded from any proposed conservation area. The Lots Road Auction House is another building which should not be excluded as we wish to protect ourselves from ever increasing density and height of new planning proposals and I know they have applied for planning in the past for a considerable increase in height. My view is that we either decide to protect ourselves and become a conservation area or we leave well alone and things continue as before, but there is no point in some being in and some being out – that is not proper protection. I also feel very strongly that all the buildings to the south of Lots Road South together with Cremorne Gardens should be included. I understand that this section of the riverside is not included within the Thames Conservation Area and feel we now have the ideal opportunity to put	In favour (21) providing 44-46 Burnaby Street is included Widen boundary to include the wharf, "the diner", Chelsea Academy and Heatherly School of Fine Art.	The Council proposes to amend the boundary of the proposed conservation area to include all the properties you have highlighted, except Cremorne Gardens which are already within the Thames Conservation Area.
			related businesses in the area and feel business premises should be included to discourage possible future pressures to demolish them in favour of large scale		

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			housing schemes. If these were all included now it would offer the new conservation area better protection because demolition within a conservation area is more controlled; even though particular buildings or existing developments may not be of architectural merit, those living within the conservation boundaries proposed by the Council and who look out on those buildings excluded by the Council would have little protection from future development. I urge the Council to reconsider its amended boundaries and either include the area in its entirety or leave it as it is.		
40	Terence Bendixson	THE CHELSEA SOCIETY	The Chelsea Society welcomes the Council's decision to act on the Core Strategy proposal to designate a conservation area based on the Lots Road triangle in Cremorne Ward. Our main concern is that the proposed boundaries are drawn too tightly around the streets of 19th century terrace houses. This is an unusual neighbourhood. It contains a desirable mixture of uses and building types and Conservation Area powers need to be deployed to keep the mixture, stop erosion by residential uses and, in some cases, promote well-designed replacement buildings. In our view the geography of the Conservation Area should contain: 1. The land-based buildings of the Chelsea Yacht and boat company. 2. All of Cremorne Gardens including the boat base and its jetty 3. Chelsea waterfront from the west side of Cremorne Gardens to the Borough boundary - including the protected Cremorne Wharf. 4. The Chelsea Academy 5. The site of the Borough car pound and the adjacent auction houses. 6. The Heatherly School of Art. 7. The Lots Road Diner (formerly the Balloon public house). 8. All the buildings to the north of the Balloon up to Burnaby Street 9. The Guinness Trust blocks of flats. 10. The modern houses in Poole's Lane. 11. All the land and buildings between Lots Road, where it runs north to south, and the Borough boundary. In other words we see the Conservation Area being as all-embracing as possible, taking over a stretch of the Thames Policy Area and including in it all riverside buildings and a wide variety of premises devoted to housing, employment and education. Indeed we consider it important that the Conservation Area Proposals Statement	 In favour (22) Should include: The land-based buildings of the Chelsea Yacht and boat company. All of Cremorne Gardens including the boat base and its jetty Chelsea waterfront from the west side of Cremorne Gardens to the Borough boundary - including the protected Cremorne Wharf. The Chelsea Academy The site of the Borough car pound and the adjacent auction houses. The Heatherly School of Art. The Lots Road Diner (formerly the Balloon public house). All the buildings to the north of the Balloon up to Burnaby Street The Guinness Trust blocks of flats. The modern houses in 	The Council will seek to amend the boundary of the proposed Conservation Area to reflect the historic function of the area as a working community in south Chelsea centred on the Lots Road Power Station (see map). This revised area includes all the land and buildings you have highlighted except the Jetty and Cremorne Gardens which are within the Thames Conservation Area.

	Name	Organisation/ Address (where given)	Representation	Summary/Key points	Council Response
			should discuss and make judgments on the protection of buildings devoted to employment, on future, river-related uses for Cremorne Wharf and on the importance of securing the continuation of low to middle rent commercial accommodation. We look forward to seeing revised proposals that move in these directions.	Poole's Lane. • All the land and buildings between Lots Road, where it runs north to south, and the Borough boundary.	
41	Sarah Horack	Cornwall Mansions, Cremorne Road	PYES to the Lots Road Conservation Area I hope my views can be added to the YES side of the balance sheet of residents' opinions. Three reasons argue strongly for Conservation Area status. 1. This area is about to be profoundly affected by large-scale commercial development of the site of the Lots Road Power Station. Although some of the results of this will be beneficial, other consequences will be detrimental to the area. If commercial development were to 'grow like Topsy' in areas near this site or dereliction of nearby residential properties were to result, the overall impact would be to obliterate the character of the area and the quality of life of current and future residents. 2. Conservation Area status would protect more than bricks and mortar, including trees, for example. For entirely superficial reasons or obsessive concerns, owners in the area are already undertaking to chop down substantial, sound, healthy, attractive trees that are valued by many other residents. Currently there is no way to halt or examine the merits of such short-sighted decisions on a case by case basis. Conservation status could change this for the better, and the protection provided for trees would extend to other useful and desirable features of this area. 3. The Lots Road area does not have the social status or grandeur of other prime parts of Chelsea and Kensington, and as a result, many regrettable changes have taken place over the 38 years that I have lived in the Royal Borough. A petrol station would never have been allowed at the junction of the King's Road and Old Church Street, but one was allowed in Cremorne Road half a block off the King's Road. Other examples abound. It is past time to stop the rising tide of carelessness about this area because once gone, there will be no getting back its quiet, modest, neighbourhood character. Thank you for taking account of my views on this matter. I hope the Lots Road Conservation Area becomes a reality as quickly as possible.	 In Favour (23) Will limit future large scale developments which would damage the area's character. Would protect trees Would stop further unwelcome additions 	Support noted

NB. Some respondents asked for their comments not to be published on the Council's website. Their wishes have been respected but their views have been included in the overall numbers for or against the proposed designation.