MOUNTANVIL

LOTS ROAD

LR41

Heritage, Townscape and Visual Impact Assessment

Montagu Evans

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EXECUTIVE SUMMARY

Montagu Evans have prepared this Heritage, Townscape and Visual Impact Assessment on behalf of Mount Anvil (Lots Road) LLP to consider the effect of development proposals for the site at Lots Road South on heritage assets, local townscape character and visual amenity. It will consider the effects in accordance with relevant legislation, planning policy and guidance.

POLICY BACKGROUND

Lots Road South is an unusual development site that straddles two local planning authorities: the London Borough of Hammersmith and Fulham ('LBHF') and the Royal Borough of Kensington and Chelsea ('RBKC'). Consequently, the statutory development plan comprises the London Plan (2021), the LBHF Local Plan (2018) and the RBKC New Local Plan Review (2024).

The Lots Road South Supplementary Planning Document (RBKC, 2022) is a material consideration because it provides design guidance on the approach to developing this site.

The part of the site within the RBKC's administrative boundary benefits from a site allocation, SA6 Lots Road South, for redevelopment to include residential and employment floor space. The indicative building heights within the site allocation area are identified to be from ground level to the top of the building, from six storeys to 10 storeys.

The supporting text to Site Allocation SA6 states that *"maximum building height is expressed as a range to allow for a distribution and variation of heights across the site"* and the appropriate height will be subject to further testing. That further testing has been demonstrated by the design development process and the analysis of heritage, townscape and visual impacts that have been undertaken in tandem.

The part of the site within the LBHF boundary does not benefit from a site allocation and there is no identification of the building heights that may be acceptable should a development come forward.

The proposed development includes tall buildings mainly within the LBHF part of the site, however small parts of Blocks A and B (13 and 11 storeys respectively) lay within RBKC.

The policy context for the development of tall buildings is found at Policy D9 of the London Plan. Under part B of Policy D9, on 'Locations', the policy states that boroughs should determine if there are locations where buildings may be appropriate. Under part C, the various potential impacts of tall buildings that development proposals should address are set out.

The context for development is not limited to Policy D9, however. London Plan Policy GG2 stresses the importance of making the best use of land; and London Plan Policy D3 seeks to optimise site capacity through the design lead approach that optimises the capacity of site, including site allocations.

The borough's tall buildings policies are at LBHF Policy DC3 and RBKC Policy CD8. The site is identified as suitable for tall buildings in the RBKC policy, and design criteria are provided by the LBHF policy.

In this case, it is important to appreciate the developments that have been permitted nearby including at Kings Road Park and Chelsea Park both to the west of the railway and to the south at Chelsea Island (including a 12 storey building), and as part of the Lots Road Riverside development. These provide a context for a detailed analysis of the impact of development on the character and appearance of the area, and setting and significance of nearby heritage assets.

CHARACTER AND APPEARANCE

The proposals seek to introduce buildings of five storeys along the Lots Road frontage to provide a range of commercial and residential uses (Blocks D and E). To the rear of Blocks D and E, there would be three buildings that rise from nine to 13 storeys (Blocks A–C). The buildings step up in height to the south as the development meets the creek wall.

The development has evolved through extensive pre-application consultation and has a clear logic to the overall architectural parti. The lower building addressing the Lots Village Conservation Area to the east is five storeys and so meets the requirements of the RBKC site allocation height restrictions and the Lots Road South SPD which requires development to step down to the conservation area.

The taller buildings lie adjacent to the railway and continue the spine of taller development that extends from the south, closer to Imperial Wharf station. We observe that this massing strategy is consistent with the overall height principles set out in the Lots Road South SPD which suggests that taller parts of the development is located away from Lots Road to retain the character of the street.

In addition, there is historical precedent for the type of growth represented by the proposed development. Map regression and historical analysis illustrates that this part of Fulham evolved from greenfield to an industrial centre illustrated by the Lots Road Power Station and the Imperial Coke and Gas Companies Gas Works on either side of the railway and Chelsea Creek. What is now proposed, and has been seen in recent developments, seek to echo the 19th and 20th century development as another layer of the evolution of the area.

The residential appearance and character of the Lots Village Conservation Area comprises a network of streets that are predominantly residential two and three storey terraced housing with commercial and education uses across the area. The taller buildings within the proposed development would contrast with these prevailing heights in terms of their scale and height. However, there are good reasons why development should be more intensive along the railway in an area that is less sensitive and has been identified in RBKC's SPD. The contrast does not detract from the character of the area; there is already an appreciable contrast between the conservation area and the taller buildings that form part of the urban setting namely the former Lots Road Power Station, Chelsea Island and the significantly taller consented development at Kings Road Park (the former gasworks in LBHF).

The contrast in scale within the development would be noticeable in views from the north-east (from within the conservation area). However, the five storey building fronting Lots Road will present an attractive frontage with variation in the building line and colour palette (and overall composition of the frontage) which will deliver a higher quality and more active west side of Lots Road than is experienced at present. The buildings also provide permeability into the site giving access to a community square, public realm at the creek side and route through at around to the western side of the site.

There would also be a contrast in views of the site from the west of the railway. However, these areas are generally less sensitive due to:

a. The separating distance involved;
b. The inclusion of a major piece of infrastructure (the railway); and
c. Boundary walls associated with the east edge of the Kings Road Park development.

Where the development will be visible, the southernmost 13 storey building will appear to have its own identity, responding to Chelsea Island. The other buildings step gradually down to the north.

Returning to London Plan Policy D9, the application site does not strictly meet part B; however, the decision-maker should consider the impact that the proposals on part C to determine whether or not the proposals are acceptable. In other words, part B is not a gateway test. This has been determined by the courts in the *Master Brewer* (2021) case[1].

Part C of Policy D9 requires attention to be paid to the way buildings appear in long range or distant views, mid-range or medium views, and immediate or short distance views, and how they affect, for example, skyline.

Part C also states that whether a tall building stands alone or is seen in a group, it should reinforce the spatial hierarchy of the local and wider context, adding legibility and wayfinding.

The accurate visual representations (or 'verified views') prepared by Miller Hare illustrate the static and kinetic sequences that are found in the local and wider area.

In immediate views, particularly when travelling from the north or south along Lots Road, visual receptors will be most aware of the five storey buildings with active frontages, trees, new pavement and hard landscaping.

In mid-range views from within the Lots Village residential area, the nine, 11 and 13 storey Blocks (A-C) will appear to rise behind and above the prevailing heights of Lots Village. Visual receptors would be able to appreciate the gaps between the buildings and the frontage on the westside of the railway that will include the larger development within former gasworks.

The materiality fenestration and composition has helped to break down the scale of those buildings and successfully tied the development into its context and as part of a cohesive whole.

In longer distance views from the River Thames, the development would appear as part of a varied skyline, largely occluded by development in the middle-ground and foreground. The massing composition would be consistent with the established datum and appear as a new and high-quality addition.

HERITAGE

This assessment identifies that the existing brick-built warehouse buildings at Nos. 65-69 Lots Road on the site are non-designated heritage assets. These buildings, while dating from the turn of the 20th century, are typical of their age and type and have been extensively altered. In our judgement they have very low significance. Their loss has been accepted in principle by all stakeholders and should be weighed as part of the overall planning balance in accordance with paragraph 216 of the National Planning Policy Framework and part F of RBKC Policy CD3.

A small part of the site lies within the Sands End Conservation Area (LBHF). This is approximately 408m² in the south-west corner of the site comprising land at the edge of Chelsea Creek. There is no built form in this area, and the land would be retained and re-landscaped as part of the creek edge. Those works mean there would be an enhancement to the character and appearance of the conservation area and the requirements of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 would be met.

The Lots Village Conservation Area is adjacent to the proposals and extends to the east across the residential area. The significance of the conservation area is derived primarily from its historic interest and the largely residential character.

The non-designated heritage assets on the site make a very low contribution to the setting and significance of the Lots Village Conservation Area. The proposals would bring change to the setting of the conservation area. However, as we have expressed above, that change has been well considered and would be experienced as part of the changing context of the area. The taller buildings along the railway would not undermine the intrinsic significance of the conservation area which would remain intact. On this basis we consider the significance would not be undermined by the proposals and the Lots Village Conservation Area would be preserved in accordance with development plan policy.

The setting and significance of the Imperial Square & Gasworks Conservation Area in LBHF to the west of the site has also been considered, and likewise it is concluded that its significance would be preserved. The Imperial Square & Gasworks Conservation Area is subject to transformative change as part of the Kings Road Park development, which would interpose between the heart of the conservation and the proposals in any event.

Finally, we consider the potential impact on Brompton Cemetery, a Grade I Registered Park and Garden and conservation area, and the Church of England Chapel within the cemetery which is Grade II* listed. The proposal would be visible for a short duration in the kinetic sequence of travelling within the cemetery towards the chapel where the distant proposal is glimpsed above the tree line.

The development would be seen to the right of the domed roof of the chapel, and on the other side of 20th century taller buildings in the area. As the viewer progresses closer to the chapel, the development would recede and eventually be fully occluded by the boundary planting.

1 *London Borough of Hillingdon, R (On the Application Of) v Mayor of London* [2021] EWHC 3387 (Admin)

In our judgement, the proposals would not undermine the understanding of the design and character of the RPG, conservation area or the Grade II* listed chapel. The glimpse of the building over approximately 900 metres, through and above the trees would lead to a change in the setting of these assets but would not harm the ability to appreciate their significance.

CUMULATIVE CONTEXT

The Kings Road Park development will transform the former gasworks site to the west of Lots Road South and it will introduce tall buildings and a new residential area to the setting and views from the Lots Village Conservation Area to the east of the site. The Kings Road Park development would also introduce tall buildings near to the proposals in the distant views from Brompton Cemetery and the River Thames.

The proposals will be seen within this context which will be fundamentally different to the previous industrial use and vacant condition of the former gasworks site.

In the distant views from the south and north, the proposals would be an additional layer to the established context of taller development introduced by Kings Road Park. The proposals for Lots Road South are substantially lower than the tall buildings within Kings Road Park and would together contribute to the creation of a varied skyline.

In the immediate and mid-range views from the east, the proposals would provide an intermediate layer between the lower scale and traditional Victorian housing and the taller, modern development beyond. This is seen as beneficial to the experience of the townscape and reinforcing the sense of enclosure within Lots Village.

SUMMARY

Overall, we consider that the development represents a balance between the effects of new development of height, scale and mass as against the need to optimise the site.

The design of the proposals has removed or minimised adverse impacts and the resultant design quality means that the effects on designated heritage assets, townscape character and visual amenity are neutral or beneficial.

On that basis we consider that the development complies with the design and heritage policies contained in the statutory development plan.

1.0
INTRODUCTION
LOTS ROAD SOUTH

INTRODUCTION

1.1 Montagu Evans have been instructed by Mount Anvil (Lots Road) LLP ('the Applicant') to provide consultancy services and produce this Heritage, Townscape and Visual Impact Assessment ('HTVIA') to support planning applications for the redevelopment of the site at Lots Road South, Lots Road, London, SW10 0RN ('the Site').

1.2 A site location plan is presented at **Figure 1.1** and an aerial view is at **Figure 1.2**.

1.3 The Site straddles the boundary between the Royal Borough of Kensington and Chelsea ('RBKC') and the London Borough of Hammersmith and Fulham ('LBHF'), and an identical planning application will be submitted to each borough.

1.4 The description of development for the planning applications is as follows (the 'Proposed Development'):

Detailed planning application for the demolition of existing buildings and structures and the comprehensive redevelopment to provide a mixed-use scheme comprising the erection of three new buildings forming five blocks ranging in height from 5 to 13 storeys. The development will deliver new homes, including affordable extra care homes, affordable general needs homes and market homes (Use Class C3), alongside non-residential floorspace including flexible commercial (Use Class E (a)(b)(g), education and art gallery space (Use Class F1 a/b) and community space (Use Class F2). The scheme includes provision for a basement accommodating plant and cycle storage. Vehicular, pedestrian, and cycle access will be taken from Lots Road. The scheme will be car free except for disabled car parking spaces. Long stay and short stay cycle spaces will be provided. The application also includes associated infrastructure, hard and soft landscaping works, play space and communal open space. Proposals include and enhancements to the Chelsea Creek wall comprising the construction of new retaining structures, intertidal landscaping, and biodiversity improvements.

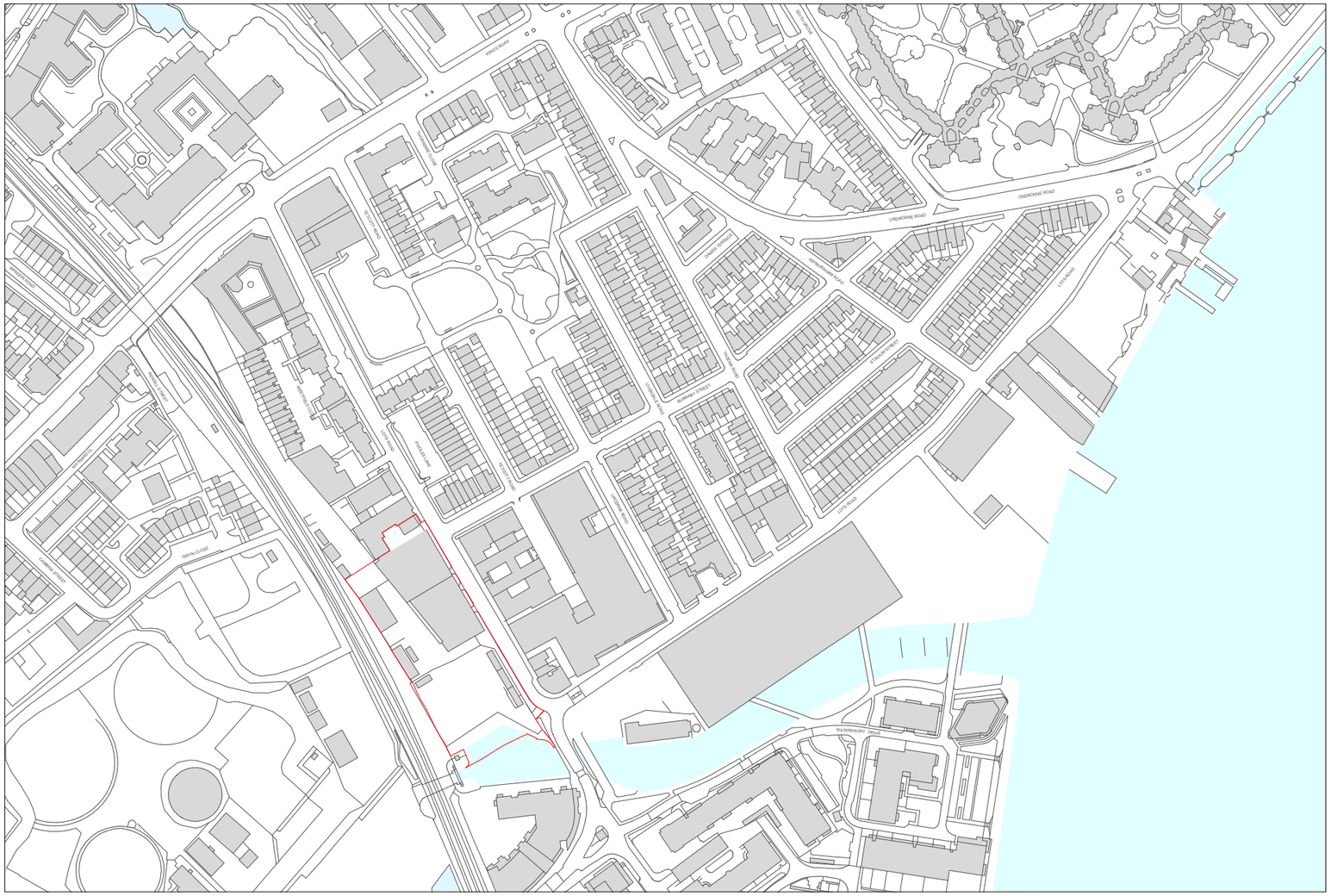

Figure 1.1 Site Location Plan

1.5 This report will assess the effect of the Proposed Development on heritage assets, local townscape character and the visual amenity of the area. The assessment for each discipline is informed by a series of verified views produced by Miller Hare. Miller Hare's methodology is provided at **Appendix 1.0**.

1.6 This report considers above-ground or built heritage assets only. Archaeology is assessed separately in reporting by RPS.

1.7 This report should be read together with the full submission material, in particularly the Planning Statement by Rolfe Judd, and the Design and Access Statement ('DAS) and drawings by PRP.

Figure 1.2 Aerial View of the Site. Source: Google

THE SITE

1.8 The Site is located on the south-west side of Lots Road between Chelsea Harbour and the King's Road. It is approximately 7,752 square metres (m2) and the boundary between the RBKC and the LBHF divides the Site on a north-west to south-east axis. The east part of the Site is within RBKC (69% of its area), and the west part of the Site is in the LBHF (31% of its area). The Site is owned by the RBKC and their land ownership extends across both boroughs.

1.9 The Site currently comprises the two storey former Lots Road Auction House and another two storey warehouse building accommodating Fairbank Studios, Access Self Storage and mixed retail. The Site also comprises a car pound which includes some temporary buildings, a salt store, and cabins which accommodate the RBKC's street sweeping and recycling service providers.

1.10 An access road runs through the Site which provides access to the RBKC's highway's depot to the north. Land in the north-west corner of the Site forms part of this highway depot and is used for at grade parking and material storage. The Site also includes the outside space of the Heatherley School of Fine Art located to the north of the Site.

HERITAGE AND TOWNSCAPE CONSIDERATIONS

HERITAGE

1.11 The Site does not contain any statutorily listed buildings or locally listed buildings. The warehouses at Nos. 65–59 Lots Road are identified as non-designated heritage assets.

1.12 A small part of the Site falls within the Sands End Conservation Area (LBHF). This is approximately 408m2 in the south-west corner of the Site comprising land at the edge of Chelsea Creek. There is no built form proposed on the part of the Site comprising the conservation area, and that land would be retained and re-landscaped as part of the creek edge.

1.13 The assessment also considers whether and to what extent the Proposed Development would affect the contribution that setting makes to the significance of heritage assets in the surrounding area.

1.14 The Site is part of the immediate setting of the Lots Village Conservation Area (RBKC) on the conservation area's west boundary comprising Lots Road. The conservation area recognises the Victorian residential and industrial areas that lay immediately to the east of the Site. The Site and its existing building are not identified as making a positive contribution to the conservation area in the *Lots Village Conservation Area Appraisal* (RBKC, 2014). The contribution of the Site to the conservation area will be considered in full in this report.

1.15 The potential setting effects have also been informed by a Zone of Theoretical Visibility ('ZTV') and testing in a virtual model using VUCITY software. The ZTV has demonstrated that the visual envelope of the Proposed Development would be relatively limited by the nature and scale of development in the surrounding area. There would be little to no visibility from areas north-west of King's Road (A308) and south-west of Imperial Road. Where visible in mid-distant and distant views, the Proposed Development would be seen in the context of the modern and tall developments that define the area around Chelsea Waterfront, including the Lots Road Power Station and emerging scheme at Kings Road Park.

1.16 Therefore, a proportionate approach to the heritage assessment has been taken, and the other sensitive heritage setting considerations include:

- The assets comprising the former Imperial Gasworks to the west of the Site (listed buildings and a conservation area);
- Sandford Manor House (Grade II* listed building) to the north-west of the Site; and
- Brompton Cemetery (Grade I Registered Park and Garden/ conservation area) and its Anglican Chapel (Grade II* listed building).

1.17 Brompton Cemetery is included for assessment because of its high grading and the potential visibility of the Proposed Development in the important views looking south on the central, ceremonial axis in the Cemetery.

TOWNSCAPE AND VISUAL

1.18 A summary of the main townscape and visual considerations is provided below.

1.19 The east part of the Site within the RBKC is allocated under Site Allocation SA6 Lots Road South in the RBKC New Local Plan Review which was adopted in July 2024. The part of the Site located in the LBHF is not subject to any allocation.

1.20 The RBKC site allocation seeks a *"high-quality mixed-use development that is employment led, to include residential and employment floorspace"*. The policy provisions include building heights (parts E and L), heritage effects (part I), design (parts J and K) and public realm (parts P and Q).

1.21 The local townscape predominantly comprises residential dwellings, commercial uses and education uses. To the north of the Site is the Heatherley School of Fine Art. To the east of the Site are Worlds End Studios, Chelsea Academy, the Lots Road Public House, as well as two residential buildings with ground floor commercial units. Further east of this is predominantly terraced housing. To the south of the site is Chelsea Creek, and beyond that the residential buildings of Chelsea Harbour, as well as the Design Centre. The West London Line sits directly to the west of the site boundary, with the Kings Road Park development site beyond.

EMERGING CONTEXT

1.22 The former Imperial Gasworks to the west of the Site is under redevelopment as Kings Road Park. It will introduce a number of tall buildings to the former gasworks site, with the tallest being 37 storeys at the south-east edge of the site, opposite Lots Road on the other side of the railway line. The remainder of the gasworks site will comprise lower tall buildings and mid-rise buildings. There will be landscaped public open space that will re-present the listed gasworks infrastructure.

THE PROPOSED DEVELOPMENT

1.23 The Proposed Development is described in full in the DAS. In summary, the Proposed Development seeks to redevelop the Site to provide 274 new homes, including 65 affordable extra care homes, 53 affordable general needs homes and 156 market homes (Class C3).

1.24 There would also be 2,038m2 of non-residential floorspace including flexible commercial (Class E (a)(b)(g)), education and art gallery space (Class F1 a/b) and community space (Class F2).

1.25 The Proposed Development would involve the demolition of the existing buildings on the Site and the construction of five new buildings, Blocks A-E, ranging from five to 13 storeys. The taller buildings, Blocks A-C, would be located on the west side of the Site addressing the boundary with the railway line. Blocks D and E to Lots Road would be five storeys.

1.26 A massing diagram and footprint of the Proposed Development with the uses proposed is presented at **Figure 1.3**. The Computer Generated Images (CGIs) at **Figures 1.4 and 1.5** show the proposed materiality, which would be brick in a traditional colour palette with subtle variation to help distinguish the Buildings and add interest to their appearance.

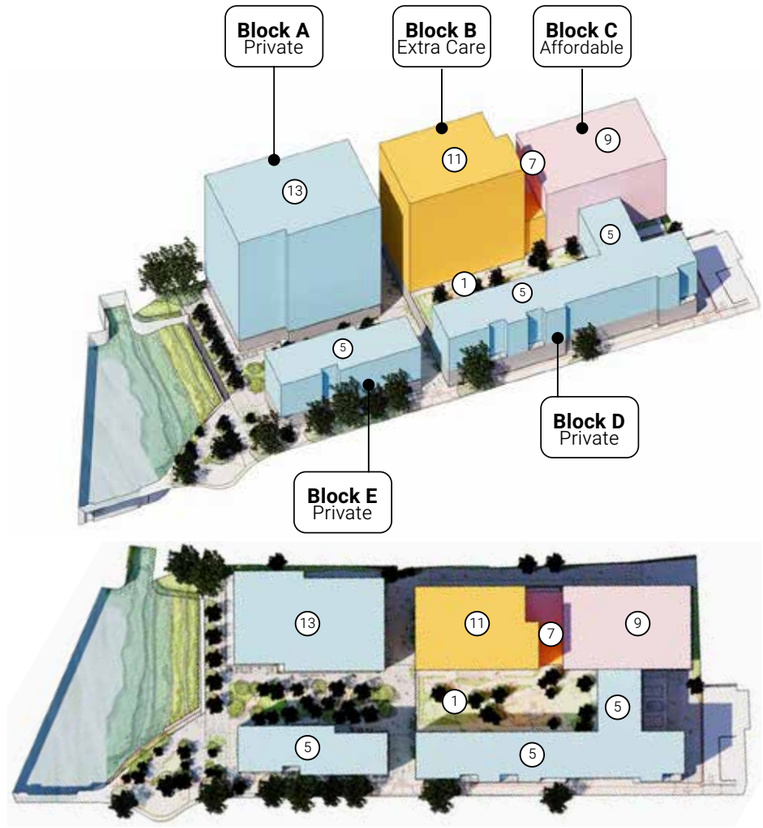

Figure 1.3 Massing Diagram and Footprint of the Proposed Development showing the Proposed Uses. Source: DAS

Figure 1.4 CGI of Blocks D and E. Source: DAS

Figure 1.5 CGI of Blocks A-C. Source: DAS

PRE-APPLICATION ADVICE

1.27 The Proposed Development is the result of an iterative design process including pre-application consultation with the RBKC, the LBHF, the Greater London Authority ('GLA') and presentation to design review panels. The pre-application consultation and how the Proposed Development has sought to respond to the feedback given is explained in the DAS.

PURPOSE OF THIS REPORT

1.28 The HTVIA provides an assessment of the effect of the Proposed Development on heritage assets, townscape character and visual amenity.

1.29 The heritage assessment will consider the significance of heritage assets and the effect of the Proposed Development upon that significance.

1.30 The townscape assessment will consider the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.

1.31 The visual assessment will consider the effect of the Proposed Development upon visual receptors. The visual assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people, usually defined according to their use or activity, rather than landscape features.

1.32 The assessment is informed by accurate visual representations ('AVRs' or 'verified views'). The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, and relevant policy designations. The viewpoint locations have been agreed with the RBKC and the LBHF through pre-application consultation.

STRUCTURE OF THIS REPORT

1.33 This report is structured as follows:

- **Section 2.0** describes the methodology that has been followed in the HTVIA.
- **Section 3.0** identifies the relevant legislation, planning policy and guidance.
- **Section 4.0** describes the history of the Site and the surrounding area which informs the understanding of the heritage, townscape and visual considerations.
- **Section 5.0** identifies the heritage assets that may be affected by the Proposed Development and describes their significance and setting.
- **Section 6.0** describes the local townscape character.
- **Section 7.0** identifies the visual receptors and visual amenity of the area.
- **Section 8.0** assesses the effect of the Proposed Development on heritage assets.
- **Section 9.0** assesses the effect of the Proposed Development on local townscape character.
- **Section 10.0** assesses the effect of the Proposed Development on visual amenity with reference to visual receptors and the verified views.
- **Section 11.0** concludes the report with a consideration of how the Proposed Development performs against relevant policies, including tall building policies.

2.0 METHODOLOGY

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METHODOLOGY

2.1 This section describes the methodology for the HTVIA. It is the product of legislation, policy and best practice guidance.

HERITAGE

2.2 The term 'heritage asset' is used within this assessment to describe both designated and non-designated heritage assets. Designated heritage assets include listed buildings, conservation areas and Scheduled Monuments. Non-designated heritage assets include locally listed buildings and may be any building or feature that is attributed with some heritage interest.

2.3 For the purposes of this HTVIA, heritage assets do not include archaeological remains.

2.4 Paragraph 207 of the NPPF states:

> *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*

2.5 'Significance' (for heritage policy) is defined in the National Planning Policy Framework as:

> *The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

2.6 This is reaffirmed by *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in* the *Historic Environment* (Historic England, 2015).

2.7 It is commonly agreed that Grade I and II* buildings are of 'exceptional' and 'particularly important' interest; therefore, these are generally afforded a higher heritage interest. This differentiation is best summarised by the drafting of paragraph 207 of the NPPF, which states that the *"level of detail (to describe the significance of heritage assets) should be proportionate to the assets' importance"*.

2.8 The description of significance is based on *Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Historic England, 2019) and *Advice Note 1 Conservation Area Appraisal, Designation and Management* (Historic England, 2019). The assessment will also have regard to adopted conservation area appraisals where relevant.

2.9 The assessment of the effect of proposals on the significance of a designated heritage asset will identify:

2.9.1 What element of significance is affected.

2.9.2 The extent of impact and the importance of the element affected.

2.9.3 How this would affect the significance as a whole.

2.10 A negative effect on a designated heritage asset will be treated as substantial or less than substantial harm as appropriate (see policy at **Section 3.0**). The courts have confirmed that substantial harm is a very high test, equivalent to the draining away of significance.

2.11 The Planning Practice Guidance requires that *"Within each category of harm (which category applies should be explicitly* identified*), the extent of the harm may vary and should be clearly articulated"*. The assessment of the level of harm is a professional judgement based on qualitative analysis.

SETTING OF A HERITAGE ASSET

2.12 Where a proposal may affect the surroundings in which the heritage asset is experienced, a qualitative assessment is made of whether, how and to what degree setting contributes to the significance of heritage assets. Setting is defined in the National Planning Policy Framework as:

> *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

2.13 The assessment of setting is informed by the checklist of potential attributes outlined by the Historic England guidance document *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (2017) ('GPA3').

2.14 GPA3 identifies five steps for assessing the effect of proposals on the setting of a heritage asset:

4. Identify the assets affected.
5. Assessing the contribution setting makes to significance.
6. Assessing the effect of the proposed development.
7. Maximising enhancement and minimising harm.
8. Making and documenting the decision and monitoring outcomes.

2.15 The assets are identified based on an understanding of the nature of the proposals and their likely effect on the surrounding area.

2.16 The checklist provided by GPA3 for step 2 is reproduced at **Figure 2.1** and the checklist for step 3 is at **Figure 2.2**.

2.17 The maximising of enhancement and minimising harm is undertaken through design development, to ensure that harmful effects are removed or minimised as far as possible.

2.18 Step 5 is incumbent on the decision maker, through the provision of conditions.

2.19 Importantly, it is necessary to understand the effect on the contribution that setting makes to the significance of an asset: setting is not a heritage asset nor protected in its own right.

2.20 The contribution that setting makes to the significance of an asset may be through historic associations, for example, or how you appreciate the asset in its surroundings.

2.21 If the contribution that setting makes to the significance of a designated heritage asset is affected negatively, then the same judgements are required on the level of harm.

Assessment Step 2 Checklist

The starting point for this stage of the assessment is to consider the significance of the heritage asset itself and then establish the contribution made by its setting. The following is a (non-exhaustive) check-list of potential attributes of a setting that may help to elucidate its contribution to significance. It may be the case that only a limited selection of the attributes listed is likely to be

The asset's physical surroundings
- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

Experience of the asset
- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, 'wildness'
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

Figure 2.1 Step 2 Checklist from GPA3

Assessment Step 3 Checklist

The following is a (non-exhaustive) check-list of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. It may be that only a limited selection of these is likely to be particularly important in terms of any particular development.

Location and siting of development
- Proximity to asset
- Position in relation to relevant topography and watercourses
- Position in relation to key views to, from and across
- Orientation
- Degree to which location will physically or visually isolate asset

Form and appearance of development
- Prominence, dominance, or conspicuousness
- Competition with or distraction from the asset
- Dimensions, scale and massing
- Proportions
- Visual permeability (extent to which it can be seen through), reflectivity
- Materials (texture, colour, reflectiveness, etc)
- Architectural and landscape style and/or design
- Introduction of movement or activity
- Diurnal or seasonal change

Wider effects of the development
- Change to built surroundings and spaces
- Change to skyline, silhouette
- Noise, odour, vibration, dust, etc
- Lighting effects and 'light spill'
- Change to general character (e.g. urbanising or industrialising)
- Changes to public access, use or amenity
- Changes to land use, land cover, tree cover
- Changes to communications/accessibility/permeability, including traffic, road junctions and car-parking, etc
- Changes to ownership arrangements (fragmentation/permitted development/etc)
- Economic viability

Permanence of the development
- Anticipated lifetime/temporariness
- Recurrence
- Reversibility

Figure 2.2 Step 3 Checklist from GPA3

TOWNSCAPE AND VISUAL IMPACT

2.22 The framework for assessment of townscape and visual impact has been prepared using the *Guidelines for Landscape and Visual Impact Assessment, Third Edition* (Landscape Institute and Institute of Environmental Management and Assessment, 2013) ('GLVIA3'). The two components of townscape and visual assessment are:

2.22.1 The assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and

2.22.2 The assessment of visual effects: assessing effects on the general visual amenity experienced by people. Specific views are also assessed where they form strategic views designated in the development plan, or where agreed with the competent authority.

TOWNSCAPE AND VISUAL VALUE

TOWNSCAPE VALUE

2.23 The townscape baseline assessment describes character areas/types and their characteristics. It defines the distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. Areas are defined and mapped with boundaries that suggest a sharp change from one townscape area to another; however, on site, changes can be more subtle and practically, this often represents a zone of transition. Criteria to assess townscape character areas and apportion value is contained in **Table 2.1**.

2.24 Assessment is informed by an understanding of how an area has evolved, the use of aerial photography and field survey, along with desk-based research as appropriate and to a level commensurate with the sensitivity of the receptor and its susceptibility to change. Important published sources will normally comprise formal character assessments prepared, for example, as part of local plan making or agencies or county authorities.

2.25 The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced, and the value attached to it. This assessment cannot practically and objectively capture what local people in an area feel about their area (unless of course this has been subject to a specific study which is produced in an objective or reflective manner). Thus, this value analysis reflects professional judgment.

TOWNSCAPE RECEPTOR VALUE			
Value	Importance	Typical Criteria	Typical Features/Characteristics
Very High	International/ National	Unique or outstanding townscape with clearly distinctive characteristics, features and elements; Widespread use of quality materials; Very strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use; No, or very limited, detracting features.	International or national designation, and/or designated heritage receptors of significant importance
High	National/Regional/ Local	Distinctive or unusual townscape with notable features and elements; Evident use of quality materials; Strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use with limited scope to improve; Limited detracting features.	National or regional designation, and/or designated heritage receptors
Medium	Regional/Local	Attractive townscape with occasional distinctive features; Recognisable urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management for land use; Some detracting features.	Regional or local recognition, including local plan designations, with value possibly expressed through literature and cultural associations.
Low	Local	Commonplace or ordinary townscape with limited variety or distinctiveness; Distinguishable urban structure, characteristic patterns and combinations of built form and open space, although often fragmented; Scope to improve management or land use; Potentially some dominant detracting features and areas of very low value.	Some positive townscape features but largely degraded and may benefit from regeneration, restoration or enhancement.
Very Low	Local	Very common townscape, often in decline; Weak or degraded urban structure, characteristic patterns and combination of built form and open space; Lack of management has resulted in degradation; Frequent dominant detracting features; Disturbed or derelict land requires treatment.	Heavily degraded townscape and/or identified for change.

Table 2.1 Townscape Receptor Value Criteria

VISUAL AMENITY VALUE

2.26 The visual baseline assessment established the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.

2.27 The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, 'visual receptors'. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:

2.27.1 Residents and other frequent users of the area;

2.27.2 People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, attractions or those whose attention or interest is likely to be focused on the landscape and on particular views; and

2.27.3 Communities where views contribute to the landscape setting enjoyed by residents in the area.

2.28 Representative viewpoints are identified based on a comprehensive review of the surrounding area, including the following criteria:

2.28.1 Heritage receptors;

2.28.2 Townscape character;

2.28.3 Where the development may be prominent;

2.28.4 Be visible from concentrations of residential areas;

2.28.5 Open spaces (parkland, publicly accessible space);

2.28.6 Potentially sensitive receptors (e.g. schools);

2.28.7 Accessibility to the public;

2.28.8 The viewing direction, distance and elevation; and/or

2.28.9 Townscape and transport nodes.

2.29 The identification of viewpoints also considers any strategic or local viewpoints identified by the local planning authorities or other relevant bodies.

2.30 The visual amenity value of locations is assessed using the criteria contained in **Table 2.2**. Amenity is a broad concept in planning, and the Planning Portal [online] defines it as "*A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.*" Changes in amenity are typically assessed through changes to what people see and perceive, and the shorthand for this are 'views' and 'visual impact'.

2.31 The places at which or in which these individuals will experience a change will always be a publicly accessible place, in line with best practice. The visual assessment is therefore separate to a 'residential amenity assessment', which considers private viewpoints from residential properties (refer to GLVIA3, paragraph 6.17). In some instances, the visual impact assessment will address impacts from private land, but that is only where this topic has been scoped with the decision maker and a specific methodology agreed. Such private land amenity assessments often rely on other concepts in town planning/measures such as privacy and enclosure or overbearing.

VISUAL AMENITY VALUE	
Value	Criteria/Examples
Very High	Areas of national or international importance and/or identified strategic views of national or international importance. Very enjoyable area with multiple positive elements and/or very high townscape value.
High	Areas of national or regional importance, or particular local importance and/or static view identified in the development plan. Enjoyable area with several positive elements and/or high townscape value.
Medium	Areas of regional or local importance and/or static view identified in planning guidance, including conservation area appraisals. Pleasant area with some positive elements and/or medium townscape value.
Low	Commonplace areas with limited positive elements and/or low townscape value, often with detracting elements.
Very Low	Area of very low townscape value (e.g. industrial areas/busy main roads) that has very few positive characteristics, usually with significant detracting elements.

Table 2.2 Visual Amenity Value Criteria

TOWNSCAPE AND VISUAL SUSCEPTIBILITY

2.32 The first stage in the assessment of the Proposed Development on a townscape or visual receptor is to identify its sensitivity to the Proposed Development. Sensitivity is identified by calibrating the baseline value of the receptor with its susceptibility, defined as the ability to accommodate the particular type and/or nature of development without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies. The criteria for determining townscape susceptibility are described at **Table 2.3** and visual susceptibility at **Table 2.4**.

TOWNSCAPE SUSCEPTIBILITY

2.33 GLVIA3 explains landscape susceptibility at pages 88–89. There is no specific definition of townscape susceptibility. Professional judgement is applied based on the understanding of landscape susceptibility to reach judgements on townscape susceptibility.

2.34 GLVIA3 describes susceptibility to change of landscape receptors as "*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.*"

2.35 Susceptibility is relative to the general type of development proposed e.g. a receptor may be more or less susceptible to a proposal for an industrial facility as opposed to a residential building depending on the receiving environment. Equally, a receptor may be more or less susceptible to a tall building than a low-rise development depending on the receiving environment.

2.36 Effects are particular to the specific landscape/townscape in question, which includes reference to aspects such as the quality, nature and condition of the receptor, or, existing scale and grain e.g. if the existing townscape is of a similar scale and/or grain as the proposed development, it may have a greater ability to accommodate the proposed development and thus a lower susceptibility to change, subject to those existing characteristics not undermining or undue consequence arising from that baseline condition or anticipated achievement of relevant townscape/landscape planning policies, which includes site allocations or anticipated development identified in the statutory development plan.

TOWNSCAPE SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the existing townscape/landscape comprises very limited or no similar types of development to that proposed and/or the townscape/landscape policies do not anticipate this type of development.
Medium	The receptor has a moderate ability to accommodate the specific proposed change e.g. the existing townscape/landscape comprises some similar types of development to that proposed and/or the townscape/landscape policies anticipate some of this type of development.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the existing townscape/landscape comprises several similar types of development to that proposed and/or the townscape/landscape policies anticipate this type of development.

Table 2.3 Susceptibility of Townscape Receptor to Change Criteria

VISUAL SUSCEPTIBILITY

2.37 GLVIA3 explains visual susceptibility at pages 113–114. Page 113 sets out that susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

2.37.1 The occupation or activity of people experiencing the view at particular locations;

2.37.2 The extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

2.37.3 Visual receptors who are more likely to have a high susceptibility to change include residents at home, people who are engaged in activities that involve an appreciation of the surrounding landscape or townscape, and visitors to heritage assets or other attractions. This is the advice of GLVIA3; however, the guidance also makes it clear that this will not be true in all cases since susceptibility to change is to some extent, as noted, a function of context.

2.37.4 Again, and subject to that qualification, visual receptors who are more likely to have a low susceptibility to change include users of amenity space that does not depend on or involve an appreciation of the surrounding landscape/townscape such as people engaged in sports activities. GLVIA3 states that "*each project needs to consider the nature of the groups of people who will be affected and the extent to which their attention is likely to be focused on views and visual amenity*."

VISUAL SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the visual receptor is likely to be heavily engaged on the view/visual amenity and/or the type of development is incongruent to the baseline condition or would undermine the enjoyment of the visual receptor.
Medium	The receptor has a moderate ability to accommodate the specific proposed change e.g. the visual receptor is likely to be partially engaged on the view/visual amenity and/or the type of development is congruent to aspects of the baseline condition or would undermine some aspects of the enjoyment of the visual receptor.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the visual receptor is likely to be not engaged on the view/visual amenity and/or the type of development is congruent to the baseline condition or would not undermine the enjoyment of the visual receptor.

Table 2.5 Susceptibility of Visual Receptor to Change Criteria

TOWNSCAPE AND VISUAL SENSITIVITY

2.38 The baseline value of the receptor and its susceptibility are calibrated using the matrix at **Table 2.5**. Sensitivity is recorded in a verbal scale (high, medium or low), supported by the clear narrative linked to evidence from the baseline study and an assessment of susceptibility.

TOWNSCAPE AND VISUAL MAGNITUDE OF IMPACT

2.39 The magnitude of impact is a qualitative judgement supported by the narrative text within the assessment. The professional judgement is quantified using criteria at **Table 2.6**. The judgement of magnitude considers the size or scale, geographical extent or duration and reversibility of the impact.

TOWNSCAPE AND VISUAL SENSITIVITY			
Receptor Value	Susceptibility of Receptor to Change		
	Low	Medium	High
Very Low	Low	Low	Low/Medium
Low	Low	Low/Medium	Medium
Medium	Low/Medium	Medium	Medium/High
High	Medium	Medium/High	High
Exceptional	Medium/High	High	High

Table 2.6 Townscape and Visual Sensitivity Matrix

TOWNSCAPE AND VISUAL MAGNITUDE OF IMPACT	
High	Major change to the value of the townscape receptor or visual amenity. The proposals would be very noticeable, comprising a notable change over an extensive area or an intensive change over a more limited area. May comprise major alteration to key elements/features/characteristics of the receptor. The duration of this impact may be permanent and non-reversible.
Medium	Moderate change to the value of the townscape receptor or visual amenity. The proposals would be noticeable, comprising a recognisable change over a large area or a moderate change over a more limited area. May comprise alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be semi-permanent and partially reversible.
Low	Minor change to the value of the townscape receptor or visual amenity. The proposals would be noticeable, although comprising a small change over a limited area or similar to a main component of the receptor. May comprise minor alteration to one or more key elements/features/ characteristics of the receptor. The duration of this impact may be temporary and reversible.
Very Low	Barely discernible change to the value of the townscape receptor or visual amenity. The proposals would not be noticeable, although comprising a very small change over a very limited area or very similar to the main components of the receptor. May comprise very minor alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be temporary and reversible.
Nil	No change to the value of the townscape receptor or visual amenity.

Table 2.7 Magnitude of Impact Criteria

TOWNSCAPE AND VISUAL LIKELY EFFECTS

2.40 Throughout this analysis, and across all disciplines, the reader will be presented with the words impact and effect. 'Impact' is defined as the action being taken, and 'effect' is the change resulting from the action. The overall effect is also given a nature of effect (beneficial, adverse or neutral). There is no direct correlation between magnitude of impact and nature of effect, since change is by definition not necessarily adverse or beneficial. Similarly, and dependent on context, one can have a high magnitude of impact which is neutral in effect, which may strike some readers as peculiar or perverse. For example, however, it is possible for a major change to be so similar to others that have occurred and are anticipated that practically speaking it is neither beneficial or detrimental to the value of the receiving receptor (and hence is neutral).

2.41 Likely effects are determined by combining the judgements of sensitivity and the magnitude of impact using a common matrix shared across all topic areas (**Table 2.7**). It is generally considered that moderate to major effects are considered 'significant' in the context of the EIA Regulations. Criteria defining the scale of effect is provided at **Table 2.8**.

TOWNSCAPE AND VISUAL LIKELY EFFECT ON RECEPTOR			
Magnitude	Sensitivity		
	Low	Medium	High
Nil	None	None	None
Very Low	Negligible	Negligible	Negligible/Minor
Low	Minor	Minor/Moderate	Moderate
Medium	Minor/Moderate	Moderate	Moderate/Major
High	Moderate	Moderate/Major	Major

Table 2.8 Scale of Effect Matrix

2.42 Professional judgement is required to determine the nature of the likely effects. Criteria defining the nature of effect is provided at **Table 2.9.** For example, there will be cases where a high magnitude of impact produces a major scale of effect, on the basis that the component is prominent or noticeable, but notwithstanding that the quality of effect is beneficial as a consequence of design quality or other benefits. This approach arises most often as a consequence of major developments in areas positively identified for transformational change. Often, such impacts will have varied effects such that a hard and fast categorisation of an effects quality is finely balanced as between beneficial or harmful. In many instances, therefore, the final identification of impact and effect will turn on discursive analysis. This makes a necessary professional adjustment to the tabular analysis format which can produce inaccurate reporting.

TOWNSCAPE AND VISUAL SCALE OF AN EFFECT	
Major	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a very significant effect.
Moderate	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a significant effect.
Minor	The change resulting from the impact of the Proposed Development upon the receptor would give rise to an effect, but this would not be significant.
Negligible	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a barely discernible effect. This would not be significant
None	The change resulting from the impact of the Proposed Development upon the receptor would have no effect.

Table 2.9 Scale of Effect Definition

2.43 The assessment of nature of effect also requires a qualitative discussion to describe and elucidate this judgement to the reader. This is necessary because townscape and visual assessment is not a strict quantitative process and some of these considerations will depend on expert judgements. Accordingly, there is an emphasis on qualitative text throughout the assessment to describe the receptors and the judgements in regard to the significance of the identified effects.

TOWNSCAPE AND VISUAL NATURE OF AN EFFECT	
Beneficial	An advantageous effect to a receptor
Neutral	An effect that on balance is neither beneficial nor adverse to a receptor.
Adverse	A detrimental effect to a receptor

Table 2.10 Nature of Effect

3.0
LEGISLATION, PLANNING POLICY AND GUIDANCE
LOTS ROAD SOUTH

LEGISLATION, PLANNING POLICY AND GUIDANCE

3.1 This section sets out the legislation, planning policy and guidance that is relevant to the HTVIA.

LEGISLATION

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

3.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act') provides the statutory duties of the decision-maker when determining applications that affect listed buildings and conservation areas.

3.3 The Site does not contain any statutorily listed buildings. There are, however, listed buildings near to the Site which may experience a change to their significance because of the Proposed Development introducing a change to their setting.

3.4 The relevant statutory provision is at **Section 66(1)** which states that:

> *In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural and historical interest which it possesses.*

3.5 A small part of the Site is located within the Sands End Conservation Area. **Section 72(1)** of the 1990 Act states that, for proposals affecting land within a conservation area:

> *...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*

3.6 The setting of a conservation area is not protected by statute, but it is considered through policy.

3.7 In preparing this assessment, we have regard to the great weight that designated heritage assets receive in decision-making and relevant case law.

DEVELOPMENT PLAN

3.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise.

3.9 The statutory development plan and the policies relevant to the HTVIA are set out at **Table 2.1**.

DEVELOPMENT PLAN DOCUMENT	RELEVANT POLICIES
London Plan (2021)	• Policy D1 London's form character and capacity for growth • Policy D3 Optimising site capacity through design-led approach • Policy D8 Public Realm • Policy D9 Tall Buildings • Policy HC1 Heritage conservation and growth • Policy HC3 Strategic and Local Views
RBKC New Local Plan Review (July 2024)	• Policy CD1 Context and Character • Policy CD2 Design Quality, Character and Growth • Policy CD3 Heritage Assets • Policy CD4 Heritage Assets – Conservation Areas • Policy CD5 Heritage Assets – Listed Buildings • Policy CD7 Registered Parks and Gardens of special historic interest • Policy CD8 Tall Buildings • Policy CD15 Views • Site Allocation SA6 Lots Road South
LBHF Local Plan (February 2018)	• Policy DC1 Built Environment • Policy DC2 Design of New Build • Policy DC3 Tall Buildings • Policy DC7 Views and Landmarks • Policy DC8 Heritage and Conservation

Table 3.1 Development Plan Policy Relevant to the HTVIA

NATIONAL POLICY

3.10 The development plan is supported by the planning policies set out in the NPPF. The relevant provisions are set out at **Table 1.2**.

NATIONAL POLICY	RELEVANT PROVISIONS
National Planning Policy Framework 2024 ('NPPF')	Chapter 12 (Achieving well-designed places) • Paragraph 131 • Paragraph 135 • Paragraph 139 Chapter 16 (Conserving and enhancing the historic environment) • Paragraph 202 • Paragraph 207 • Paragraph 210 • Paragraph 212 • Paragraph 213 • Paragraph 214 • Paragraph 215 • Paragraph 216 • Paragraph 219 • Paragraph 220

Table 3.2 National Planning Policy Relevant to the HTVIA

MATERIAL CONSIDERATIONS

3.11 In addition to legislation and policy, the assessment will have regard to relevant planning guidance and any material considerations, including:

- Planning Practice Guidance (online);
- *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment* (Historic England, 2015);
- *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Historic England, 2017);
- *Sands End Conservation Area Character Profile* (LBHF, 1997);
- *Advice Note 4: Tall Buildings* (Historic England, 2022);
- *Lots Village Conservation Area Appraisal* **(RBKC, 2014);**
- *Imperial Square & Gasworks Character Profile* (LBHF, 2007);
- *Brompton Cemetery Draft Conservation Area Appraisal* (RBKC, 2017); and
- *Lots Road South Design Brief Supplementary Planning Document* (RBKC, July 2022).

POLICY DISCUSSION

SITE DESIGNATIONS

3.12 The Site is allocated for development by Site Allocation SA6 Lots Road South in the RBKC New Local Plan Review (2024). The Site is not allocated in the LBHF Local Plan (2018).

3.13 RBKC Site Allocation SA6 identifies the Site for *"high-quality mixed-use development that is employment led, to include residential and employment floorspace"* (part A).

3.14 Of relevance to this assessment, Site Allocation SA6 states that:

[...]

E. Maximum building heights shall be within the range of 22 m to 34 m from ground level to the top of the building or 6 storeys to 10 storeys.

[...]

I. Where the development is in the setting of a designated heritage asset, following the requirements of Part E of Policy CD3, the significance of the designated heritage asset should be preserved or opportunities taken better to reveal that significance.

J. There should be a series of buildings along Lots Road with modest variation in form, that respects the scale of existing buildings on Lots Road.

K. Ensure the architecture and materials reference the industrial heritage and character of the area.

L. The development should locate taller buildings away from Lots Road.

M Create an active frontage on Lots Road with a variety of commercial uses at ground floor.

N Create courtyard space(s) within the development accessed through gaps between buildings.

[...]

P Create a new attractive and welcoming public space that is accessible to all.

Q Make a feature of the creek within the landscape strategy.

3.15 The supporting text to the site allocation policy states:

This site is suitable for tall buildings and a maximum building height is expressed as a range to allow for a distribution and variation of heights across the site. The site is of a scale that it can accommodate a variety of building heights. The maximum height set out in Policy SA6 below is indicative only, it is subject to further testing and may only be appropriate on part of the site.

3.16 There is further design guidance provided in the Lots Road South SPD that was adopted by RBKC in July 2022.

3.17 The Lots Road South SPD reiterates the policies in Site Allocation SA6 listed above. It is additionally noted that the guidance in the SPD states that Lots Road Power Station should retain its prominence as a landmark.

HERITAGE

3.18 London Plan Policy HC1 requires that development proposals affecting heritage assets and their settings should *"conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings"* (part C). It also has regard to cumulative effects, stating that *"The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed"* and harm should be avoided, and heritage enhancement opportunities should be identified early in the design process to 'integrate' heritage considerations.

3.19 The RBKC's heritage policies at Policy CD3-5 reflect the London Plan. RBKC Policy CD3 confirms the great weight that designated heritage assets receive (part B) and requires development to preserve or enhance the significance of designated heritage assets (part C).

3.20 Parts D and F of RBKC Policy CD3 refers to the policies in the NPPF which are discussed below in terms of harm to a designated heritage asset and the effect of development proposals on non-designated heritage assets.

3.21 Part E of RBKC Policy CD3 has regard to the setting of designated heritage assets which is relevant to the Proposed Development given the setting relationship to the Lots Village Conservation Area in particular. Part E states that:

1. The Council will look for opportunities to enhance or better reveal the significance of the designated heritage asset.

2. Where the setting of the designated heritage asset makes a positive contribution to its significance, development which affects that setting will be permitted if it preserves or enhances the significance of the designated heritage asset.

3. Where the setting is neutral or harmful to the significance of the designated heritage asset, development proposals will be expected to make the effect no worse while opportunities should be taken better to reveal that significance.

3.22 The requirement to preserve or enhance the setting and significance of conservation areas is reiterated in RBKC Policy CD4 and for listed buildings at RBKC Policy CD5.

3.23 The heritage policies in the LBHF Local Plan are provided at Policy DC8. Part a) states that: *"the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and proposals should secure the long term future of heritage assets. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation"*.

3.24 Part c) of LBHF Policy DC8 states that *"applications should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high quality design within their setting"*.

3.25 The policy states that there will be particular regard to matters of scale, height, massing, alignment, materials and use (part e).

3.26 LBHF Policy DC8 refers to and reflects the NPPF on the approach to harm to designated heritage assets and proposals affecting non-designated heritage assets which are described below.

NPPF

3.27 The historic environment policies in the NPPF are at Chapter 12 and specifically paragraphs 202, 207, 210, 212, 213, 215, 216, 219 and 220.

3.28 The NPPF confirms the great weight which is given to designated heritage assets affected by development proposals (§ 212).

3.29 In determining applications, local authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness while sustaining significance and finding viable uses (§ 210).

3.30 Any harm to a designated heritage asset requires clear and convincing justification (§ 213) and the courts have confirmed this is no more than the balance of public benefits required by paragraph 215 (in the case of less than substantial harm).

3.31 There are two categories of harm to a designated heritage asset, 'substantial' and 'less than substantial'. Substantial harm is a very high test, equivalent to the significance of the asset being lost. Less than substantial harm is anything below this threshold, and the Planning Practice Guidance (PPG) states that "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated" (Paragraph: 018 Reference ID: 18a-018-20190723).

3.32 A word-scale is commonly adopted to describe the extent of less than substantial harm, for example ranging from 'limited' or 'very low' to 'high'.

3.33 Paragraph 215 of the NPPF states that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

3.34 Paragraph 220 recognises that not all elements of a conservation will necessarily contribute to its significance. The loss of a building or element that makes a positive contribution to the significance of a conservation area should be treated as substantial or less than substantial harm as appropriate, "taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area [or World Heritage Site] as a whole" (§ 220).

3.35 Paragraph 219 states that:

Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

3.36 The proposals may also affect the contribution that setting makes to the significance of non-designated heritage assets within the square. Paragraph 216 of the NPPF states:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

DESIGN AND VIEWS

DEVELOPMENT PLAN POLICIES

3.37 The London Plan Policy D3 requires site capacity to be optimised through the design-led approach. In summary, it states that local context should be enhanced by *"delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions"* (part D, 1). It also refers to active frontages (part D, 6) and achieving high quality that responds to the existing character of a place (parts D, 11 and 12).

3.38 There has also been regard to the public realm policy at London Plan Policy D8.

3.39 The RBKC design policies are at Policy CD1 and CD2. The policies require development to be *"beautiful"* and have regard to the existing context (Policy CD1, part A). The response to the local townscape can be achieved through architecture and local form. Part B of Policy CD1 identifies the following characteristics:

1. Addressing matters such as scale, height, bulk, mass and proportion.
2. Considering how the plot width, building lines, street form, rhythm, and roofscape responds to the context.
3. Considering how materials are used and how they relate to any historic fabric.
4. Considering vistas, views, gaps, and open space, including how planting, trees and greenery contribute to their character.

3.40 Part D of Policy CD1 is relevant to the Proposed Development because of the proximity to Chelsea Creek. It states that: *"Require riverside and canalside development to enhance the waterside character and setting, including opening up views and securing access to the waterway"*.

3.41 The LBHF Policies DC1 and DC2 likewise require high quality design in new development that has regard to its context. LBHF Policy DC2 has several provisions that are design considerations for how high quality design may be achieved:

a. the historical context and townscape setting of the site, and its sense of place;
b. the scale, mass, form and grain of surrounding development and connections to it;
c. the relationship of the proposed development to the existing townscape, including the local street pattern, local landmarks and the skyline;
d. the local design context, including the prevailing rhythm and articulation of frontages, local building materials and colour, and locally distinctive architectural detailing, and thereby promote and reinforce local distinctiveness;
e. good neighbourliness and the principles of residential amenity;
f. the local landscape context and where appropriate should provide high quality landscaping and public realm with good permeability;
g. sustainability objectives; including adaptation to, and mitigation of, the effects of climate change;
h. the principles of accessible and inclusive design; and
i. principles of Secured by Design.

NATIONAL POLICIES

3.42 The NPPF has design policies at Chapter 12 and specifically paragraphs 131, 135 and 139. The design policies in the NPPF seek to create *"high quality, beautiful and sustainable buildings and places"* (§ 131). Paragraph 135 states that planning decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

TALL BUILDINGS

3.43 A tall building is proposed within the part of the Site that mainly falls within the LBHF. Small parts of the tall buildings proposed fall within the administrative boundary of the RBKC, so the tall buildings policies of both boroughs apply.

3.44 London Plan Policy D9 is on tall buildings. It requires local planning authorities to define a tall building (part A) and identify locations within their boroughs where tall buildings may be acceptable and what the heights may be (part B). It has been confirmed in recent High Court decisions[2] that part B is not a gateway test, and tall buildings may be acceptable in locations not identified by a local planning authority if they meet the requirements of part C of the policy.

3.45 Part C of London Plan Policy D9 has regard to the impacts of tall building proposals and requires that the visual impact of a tall building is assessed to ensure that it does not adversely affect immediate, mid-range and long-range views:

i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

3.46 The other relevant provisions under part C, 1 of London Plan Policy D9 are as follows:

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan
d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

3.47 LBHF Policy DC3 requires that any proposal for a tall building will need to demonstrate that it:

a. has a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form;
b. is of the highest quality of architectural design and materials with an appropriate form and silhouette which contributes positively to the built heritage and image of the borough;
c. has an acceptable impact on the skyline, and views from and to open spaces, the riverside and waterways and other locally important views and prospects;
d. has had full regard to the significance of heritage assets including the setting of, and views to and from, such assets, has no unacceptable harmful impacts, and should comply with Historic England guidance on tall buildings;
e. is supported by appropriate transport infrastructure;
f. has an appropriate design at the base of the tall building and provides ground floor activity;
g. interacts positively to the public realm and contributes to the permeability of the area;
h. is of a sustainable design and construction, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaptation of the space;
i. does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements; and
j. respects the principles of accessible and inclusive design.

3.48 RBKC Policy CD8 states that tall buildings will only be acceptable in locations that are identified in the RBKC Local Plan.

3.49 The Site is identified as an area suitable for tall buildings on **Figure 6.4** of the RBKC Local Plan, and paragraph 6.65 of the supporting text to Policy CD8 states that: *"SA6 Lots Road South is also identified as an appropriate location for a tall building. The height set for this site will be subject to further testing and may only be appropriate on part of the site"*. The tall policy reiterates the indicative heights set out by Site Allocation SA6 (see earlier in this section).

2 See *Master Brewer* decision: *London Borough of Hillingdon, R (On the Application Of) v Mayor of London* [2021] EWHC 3387 (Admin)

4.0
HISTORIC DEVELOPMENT
LOTS ROAD SOUTH

HISTORIC DEVELOPMENT

4.1 This section describes the historic development of the Site and surrounding area.

4.2 This section and the heritage baseline at **Section 5.0** have been informed by sources including:

- Historic Ordnance Survey maps – accessed via the National Library of Scotland online at https://www.nls.uk/ [accessed 1 August 2023];
- National Heritage List for England maintained by Historic England;
- *Lots Village Conservation Area Appraisal* (RBKC, 2014);
- *The College of St Mark and St John Conservation Area Appraisal Draft* (RBKC, 2017);
- *Imperial Square & Gasworks Character Profile* (LBHF, 2007);
- *Sands End Conservation Area Character Profile* (LBHF, 1997);
- A History of the County of Middlesex: Volume 12, Chelsea (ed. Patricia E. C. Croot, 2004). Available online at British History Online: https://www.british-history.ac.uk/vch/middx/vol12/pp31-40 [accessed 2 July 2025];
- *The Buildings of England: London 3: North West* (Cherry, B and Pevsner, N., 1991);
- Crace Collection of Maps of London – accessed via the British Library online at http://www.bl.uk/onlinegallery/index.html [accessed 1 August 2023];
- Aerial photographs from Britain from Above. Available online at https://britainfromabove.org.uk [accessed 1 August 2023]; and
- Hidden London. Chelsea, Kensington & Chelsea. Available online at https://hidden-london.com/ [accessed 1 August 2023].

HISTORY OF LOTS ROAD

4.3 This description of the history of the Lots Road area will focus on the development from the 18th century onwards as this is most relevant to the Site and the heritage assets that are sensitive to the Proposed Development.

4.4 Briefly on the area's earlier history, the name 'Lots Road' is derived from the Anglo-Saxon, when the north bank of the River Thames was divided into individually owned 'lots' and open to common pasturage.

4.5 Records from 1544 identify the road as 'lez lotte' in accordance with the lots of ground which were originally part of the manor over which the parishioners held Lammas Rights. Lammas land is a type of land that was historically used for grazing by people other than the owner of the land during the winter months up until the time of reaping, or 'lammas', and until sowing.

4.6 In the 17th century, Chelsea Farm was constructed in the area. The farm was used for market gardening to supply central London. The area retained an agricultural character.

4.7 King's Road had been established at this time, built in 1694 as a private road for King Charles II to travel between St James Palace and Hampton Court. This remains a principal route connecting the west to central London.

18TH CENTURY

4.8 Roque's Map of 1761 shows that development in the area in the mid-18th century was concentrated on the now south-western edge of Chelsea and Battersea on the opposite side of the River Thames (**Figure 4.1**).

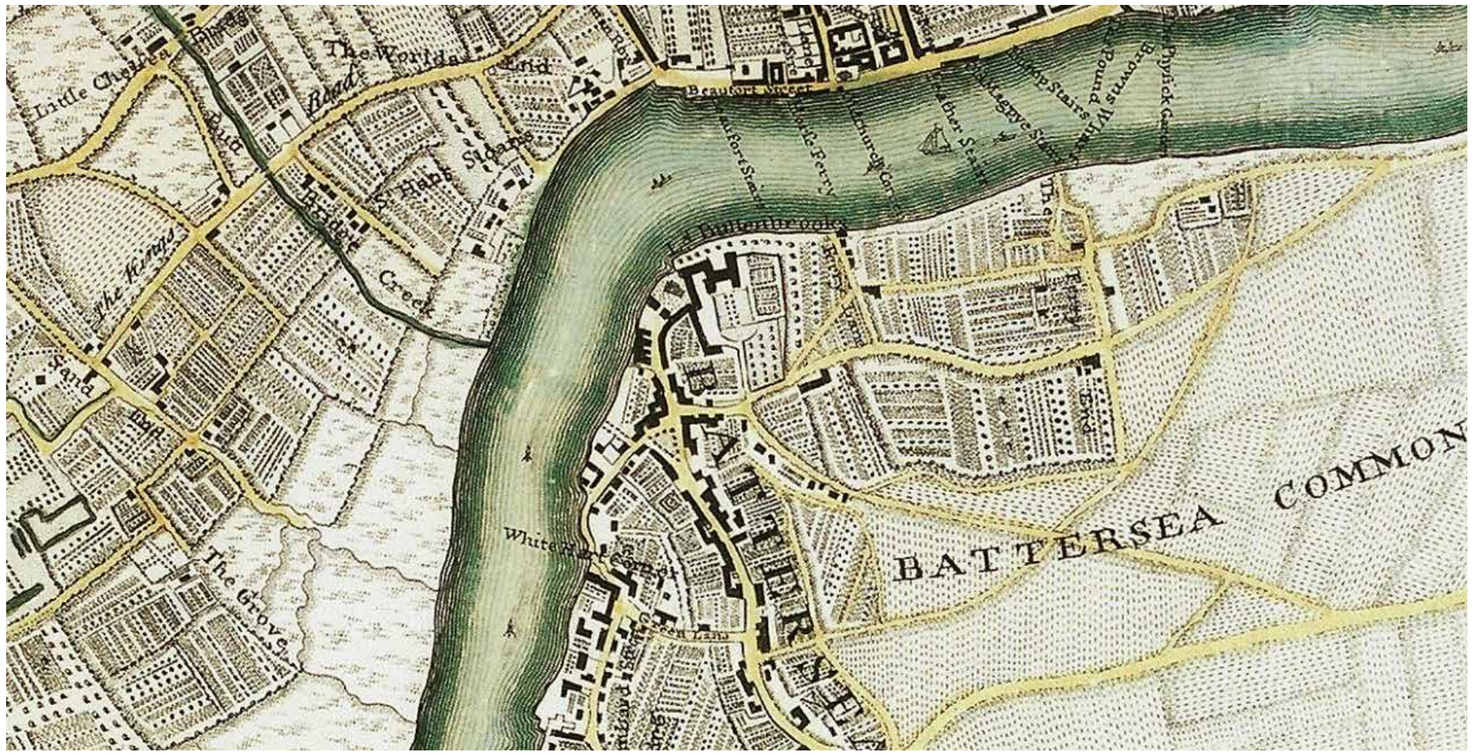


Figure 4.1 Rocque's Map of London in 1761. Source: The British Library

4.9 At this time, the area was principally rural, characterised by farmland, parkland of grand estates, markets gardens, and small dispersed settlements. Individual arable plots are clearly demarcated by boundaries on the map. Built form throughout this period is fairly sparse, densifying towards central London and along the riverside.

4.10 The Little Chelsea Bridge was also *in situ* enabling access across Bridge Creek. The maps also show the World's End Brewery and adjacent passageway established by Samuel Gower Poole in 1729.

4.11 Throughout the 18th century residential development increased at a slow pace, with a few individual houses, built in connection with intensified agricultural and gardening. Particularly notable was Chelsea Farm and Ashburnham House, two small country-house estates created from manorial holdings with access via Lots Lane and Hob Lane. By the late 1700s the grounds of these two properties covered approximately 10-acres from Kings Road to the river and their market gardening plots supplied much of central London until 1778 when the Farm was sold. The Site is located within the original Chelsea Farm Estate.

4.12 The country houses remained in use until 1820s before acquiring the name Cremorne House.

EARLY 19TH CENTURY

4.13 Common grazing was no longer allowed on arable lots in the area following the abolition of Lammas Rights in 1825. This was the catalyst for extensive change within the area. Private occupants for large houses were hard to find in the early 1800s which led to the change of use for a number of premises such as Cremorne House.

4.14 In 1830, Charles Random De Berenger purchased Cremorne House and established the 'National Sporting Club', known as Cremorne Sports Stadium. His aim was to cultivate 'skill and manly exercise' including shooting, sailing, bathing, archery and fencing. Later in 1845 the Stadium was turned into the Cremorne Pleasure Gardens, used for entertainment purposes which expanded again in 1850s to encompass the grounds at Ashburnham House.

4.15 By 1870, the Cremorne Pleasure Gardens had gained a reputation for prostitution and vice that arose from the drunken and disorderly behaviour that came with the entertainment events held in the evenings. In response, local organisations such as the Chelsea Vestry campaigned for the Gardens closure and renewal of its license to be refused. The lease on the land at the Pleasure Gardens lapsed in 1877 and the area was subsequently used for housing development.

INDUSTRIALISATION IN THE LATER 19TH CENTURY

4.16 The Ordnance Survey ('OS') map from 1869–1874 **(Figure 4.2)** shows the significant industrial development that took place in the latter part of the 19th century. There were several industrial developments on Lots Road at this time: wharfs, a Flour Mill, the Cadogan Iron Foundry and Horticultural Works occupied the land lying adjacent to the Chelsea Creek and to the west of Pooles Lane.

4.17 Other industrial enclaves also emerged near Stanley Bridge and Sand's End alongside workers cottages and a greater concentration of development along the riverbanks of the River Thames.

4.18 The most notable industrial development in the area was the Imperial Gas Works that was established to the west of the Site and on the opposite side of the railway lines. The first cylinder was built to store gas manufactured at the St Pancras Gasworks and was owned and operated by the Imperial Gas and Coke Company in 1824. The No. 2 Gas Cylinder followed with construction taking place between 1829 and 1830, accompanied by the office buildings that were added in 1856. By 1867, a further three gas cylinders were erected and by the end of the century the Imperial Gas Works had almost reached their full extent.

4.19 Other major infrastructure works also took place in the 19th century, including the Kensington Canal and Railway, both of which were located on the boundary between RBKC and LBHF (along the line of Counter's Creek) in 1828. The canal was intended to aid the transportation of goods and minerals from the London Dock.

4.20 Original plans intended to connect the canal with the Grand Junction Canal; however, costs were prohibitive, and the project was abandoned. The land was later purchased by the Bristol Birmingham and Thames Junction Railway in 1836 (later named the West London Railway), this comprised a short line to Willesden connecting to other principal rail routes.

4.21 The mainline railways, Great Western and Northwestern, required extensions south of the Thames and in 1859 an Act of Parliament authorised the conversion of the canal into the railway, which is visible on the 1898 OS map at **Figure 4.3**. As seen from the map, the railway line diverges to the west of the canal which leaves a small section of the Chelsea Creek that runs parallel to the railway line and to the rear of properties fronting Lots Road. This continued to serve the industrial operations taking place at the Flour Mills and Imperial Gas Works, until traffic finally ceased in 1967.

4.22 The remainder of the canal was finally built over by later railway development. Today, the original route of the waterway can be best understood by following the present-day West London Line from the Thames to Kensington (Olympia) Station.

LOTS VILLAGE

4.23 Lots Village is the residential area that spans east and north of Lots Road, bounded by the Kings Road to the north and Cremorne Road to the east, the Thames to the south and the railway line to the west.

4.24 The area is likely to have accommodated the working-class community employed by the industries operating nearby. The houses that survive today were mostly built in the 1880s following the sale and closure of the Cremorne Pleasure Gardens.

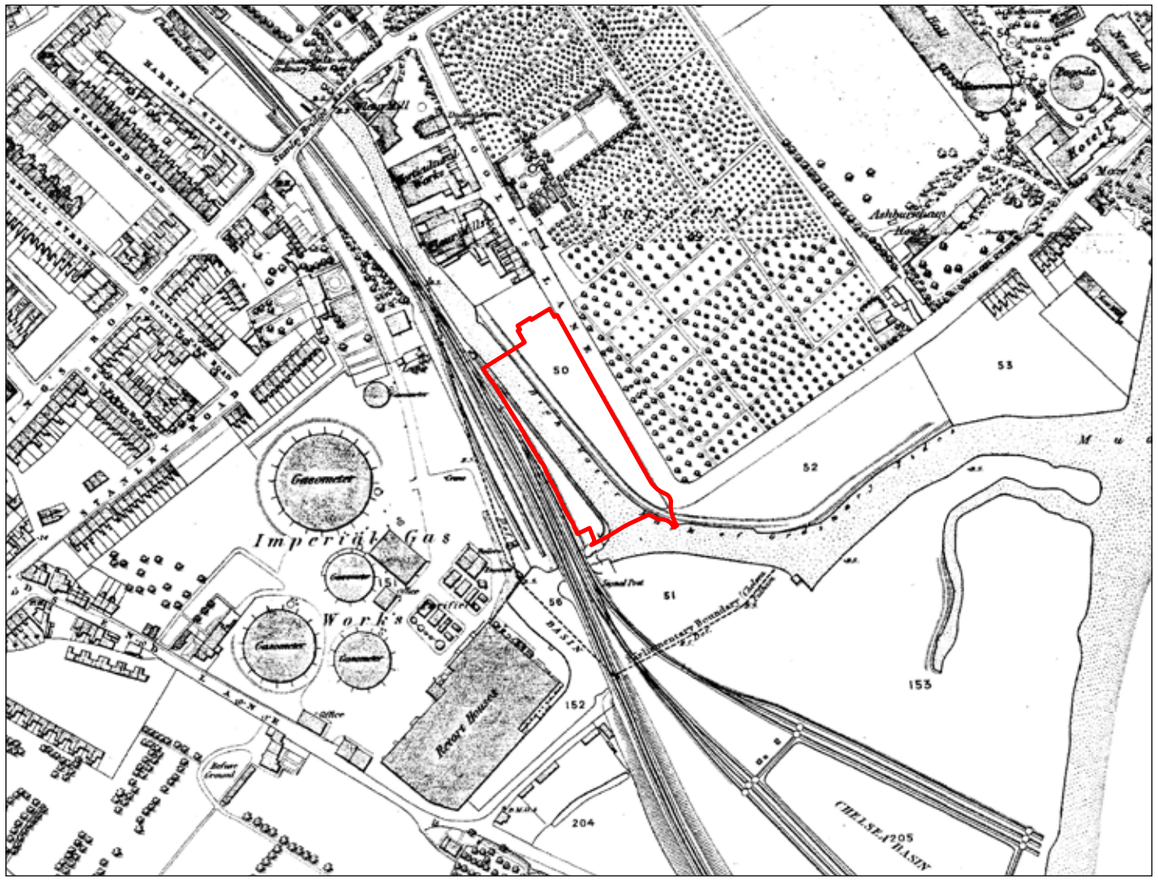


Figure 4.2 1869–1874 OS Map. Source: Promap

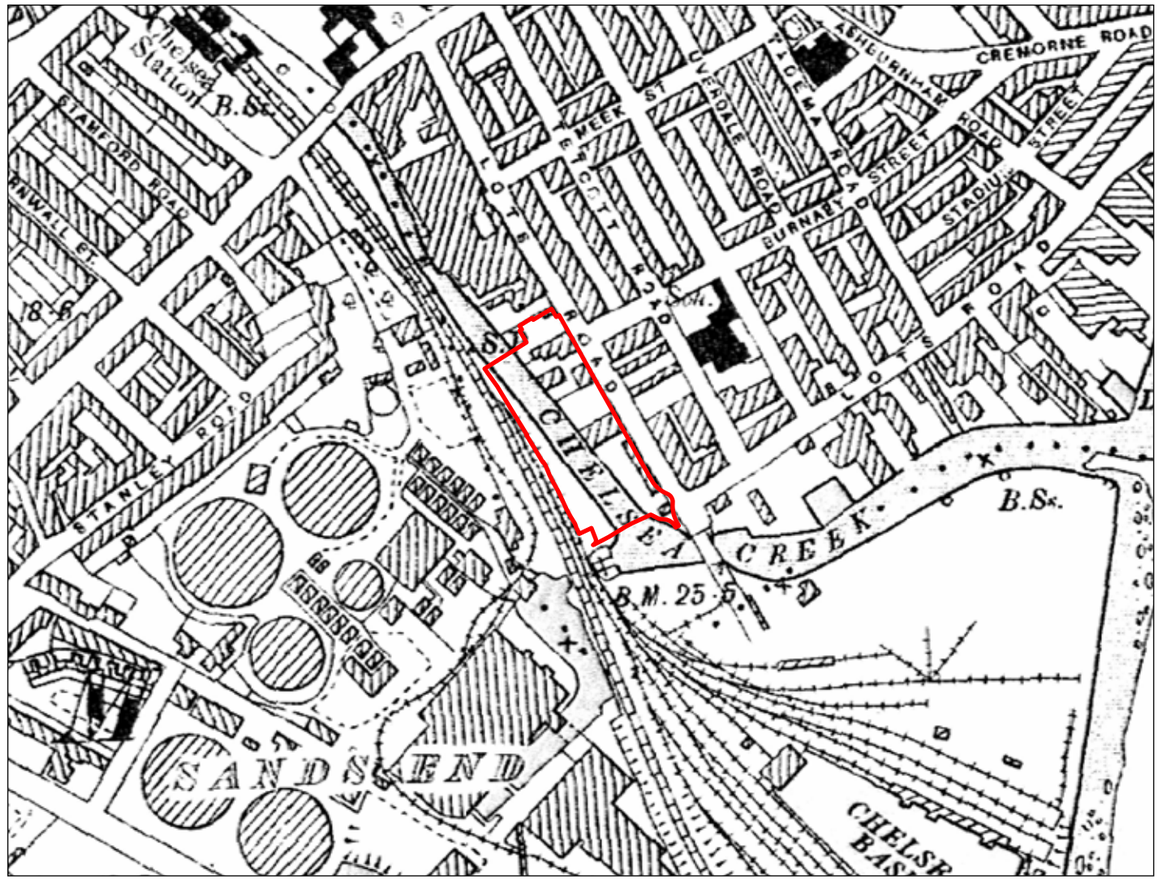


Figure 4.3 1898 OS Map. Source: Promap

20TH CENTURY

4.25 Industrial development continued into the 20th century. In 1904, the construction of Lots Road Power Station was complete, and it became the largest power built at the time, powering the majority of rail and tramways in the Underground Group.

4.26 The Lots Road Power Station and the River Thames were a particular target for bombing throughout the course of both World Wars. Despite this, the Power Station only suffered minor damage when a bomb landed on the west end of the boiler house.

4.27 **Figure 4.4** illustrates that the damage to residential dwellings on the northern end of Tetcott Road and Upcerne Road and towards the south-east near Cremorne Wharf ranging from minor blast damage to damage beyond repair. However, the majority of Lots Village remained largely unscathed and the artisanal terraced housing still survives today.

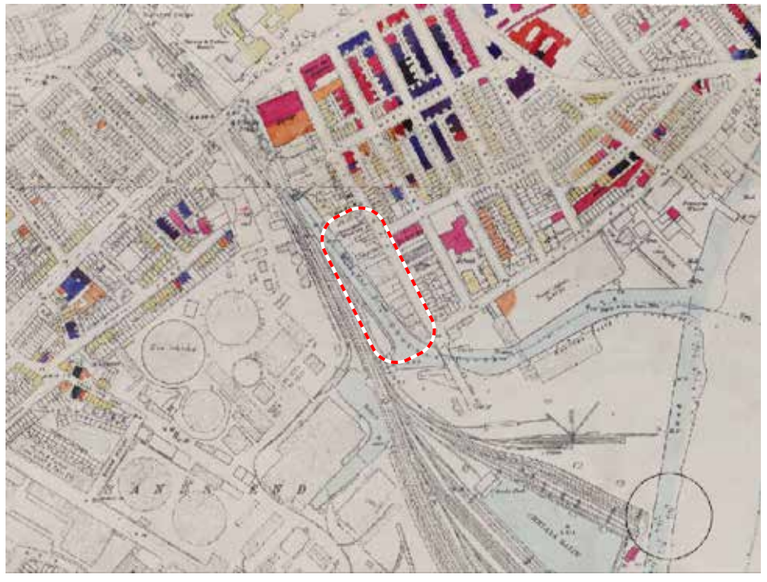


Figure 4.4 Bomb Damage Map 1945 Source: Layers of London

4.28 In the years that followed the Second World War (1939–1945), the Lots Road area was identified as a potential route for a new motorway (West Cross Route) which would facilitate access across the River Thames. However, costs meant that the project was unviable, and the plans never came forward. This in conjunction with the general decline in industry led to a period of neglect and degeneration until the 20th century regeneration and development improved its desirability.

4.29 The *Lots Road Conservation Area Appraisal* (2014) refers to a Council report from 1976 that states 28% of the residential properties in the area were unfit for use and a further 75% of households lacked or had to share basic amenities such as access to hot water, cooking facilities and food storage. As a result, RBKC designated the Lots Road area as a 'General Improvement Area'. Between 1976 and 1988 much of the accommodation was refurbished and Westfield Park was created on the site of former bomb damage. This provided new public open space to an area which was previously lacking of it.

4.30 Alongside the Council's works, private investment in employment sites along Lots Road led to the creation of several workshops and design industries. This commercial activity is crucial to the character of the Road, distinguishing itself from the residential development that extends towards the east and north of Kings Road.

RECENT HISTORY TO THE PRESENT DAY

4.31 Residential and commercial investment continued in the 21st century. One of the most significant developments to take place was the closure of the Lots Road Power Station. The building ceased to produce electricity in 2001 and in 2002, the Underground network switched to power generated by the National Grid. Subsequent planning application submitted in 2006 sought to redevelop the site to provide a modern residential led mixed-use scheme the construction of which was complete in 2018.

4.32 The area is now served by the London Overground station, Imperial Wharf, which opened on the 27 September 2009, connecting Lots Road to central London and beyond.

HISTORY OF THE SITE

4.33 Rocque's Map (1761) (**Figure 4.1**) shows the Site is clear of any form of built development in the late 18th century and its use is consistent with the surrounding area which was characterised by agricultural farmland.

4.34 This is unchanged until sometime between 1828 and 1869, where OS maps from 1869–1874 provide the first indication of built form appearing on Lots Road (**Figure 4.2**). However, the Site itself remains vacant as does the land on the opposite side of Pooles Lane.

4.35 The next OS map published in 1898 (**Figure 4.3**) shows that the Site was first developed in the late 1800s.

4.36 The 1920 OS map (**Figure 4.5**) shows that little change took place on Lots Road in the early 20th century. There appear to have been small extensions to the rear of two of the units on the Site, with the rear of the buildings now immediately adjacent to the Creek.

4.37 **Figure 4.6 is an aerial photograph of the** Site from 1921. The north boundary can be identified from the point Burnaby Street adjoins Lots Road. A timber yard occupies the northern section of the Site which appears to contain a number of temporary structures and construction materials. South of the yard is a large warehouse (No. 71 Lots Road) the ground floor of which is punctuated regularly by windows and a rounded roof built from a light reflective material.

4.38 There are two much narrower warehouse units adjoin No. 71 Lots Road to the south with pitched roofs and are composed of a darker material (Nos. 65–67 Lots Road). The south part of the site comprises another yard. Each building appears to be served by its own private wharf: Roland Wharf located at the north appears to have served the property at 71 Lots Road, and Crown Wharf served the units at 65–69 Lots Road. The aerial image shows a vessel moored against the southernmost yard suggesting the waterway continued to actively serve the industrial units operating there.

4.39 Later aerial photographs taken in 1932 (**Figure 4.7**) show the Site was redeveloped. The timber yard at the north remains, however all other units (save for one of the narrower warehouses) have been redeveloped. The southern yard also contains an additional three warehouses.

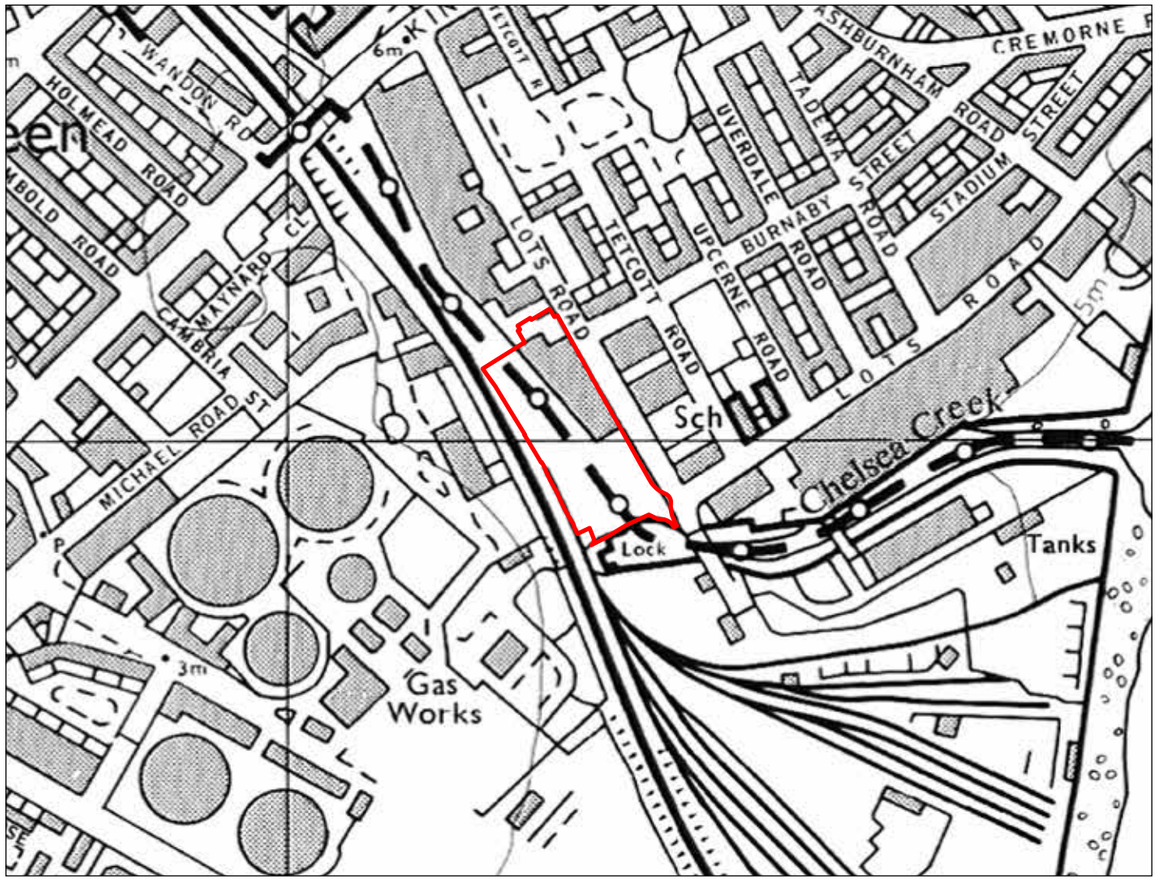


Figure 4.5 1920 OS map. Source: Promap

Figure 4.6 Aerial photograph from 1921 Source: Britain from Above

Figure 4.7 Aerial photograph from 1932. Source: Britain from Above

4.40 The 1940 OS map (**Figure 4.8**) identifies the properties present on Site as Nos. 71, 65–69 Lots Road, and the Lion Works (moving north to South towards the river). This suggests that the Site's industrial operations were still active at this time.

4.41 A planning application (RBKC ref. TP/79/1192) was submitted in September 1979 that shows built form on Site had changed. The larger square unit remained at No. 71 and to the south another building (No. 65 Lots Road) appeared as a Transport Depot. The Lion Works is no longer visible and instead the southernmost unit is numbered No. 63 Lots Road. There were several planning applications in the late 1950s and early 1960s in connection with the use of the premise as a motor repair garage, primarily concerned with taxi cabs.

4.42 The first reference to the Site's use as an Auction Room appears in the 1970s. A search of the RBKC microfiche planning application register records an application relating to units 65–67 Lots Road submitted in 1978 (RBKC ref. TP/78/908) where the applicant sought to restore the use to a furniture store and auction rooms.

4.43 Subsequent signage applications submitted on behalf of Bonham's auctioneers refer to units at Nos. 65–69 Lots Road suggesting the auction house had expanded. Photographs submitted in support of the application (RBKC ref. CA/96/014) demonstrate the units Nos. 65–69 as they are today (**Figures 3.9 and 3.10**).

Figure 4.8 1940 OS map. Source: Layers of London

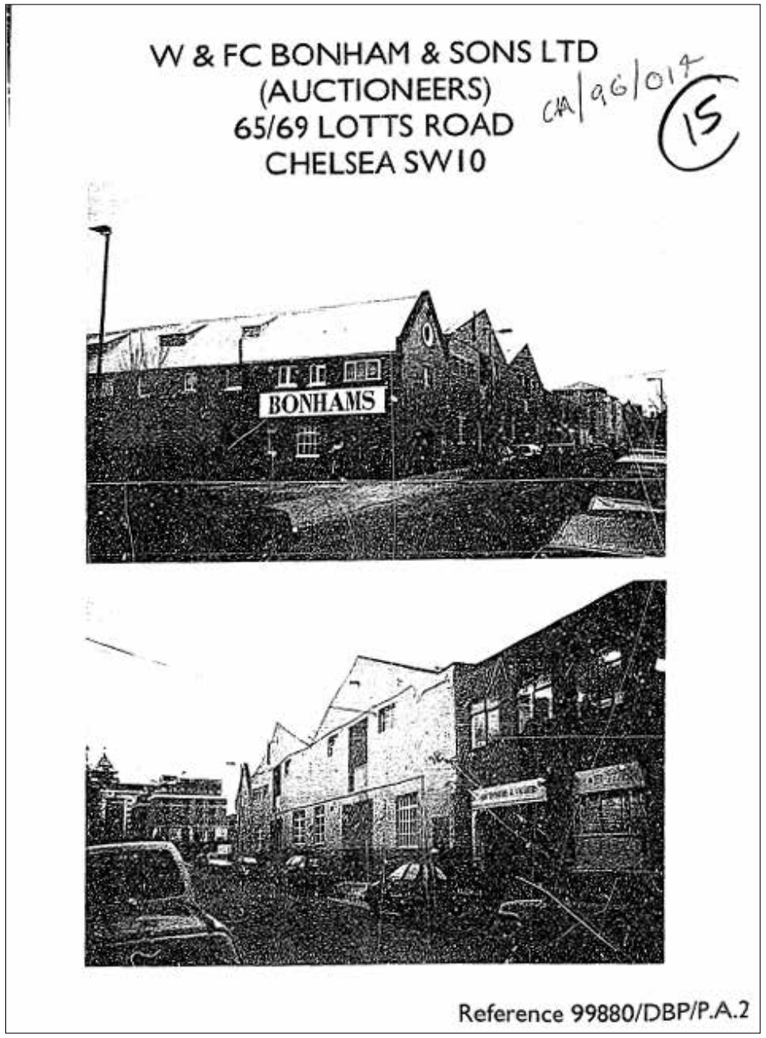


Figure 4.9 Photographs submitted in planning application ref CA/96/014, 65–67 Lots Road. Source: RBKC Microfiche

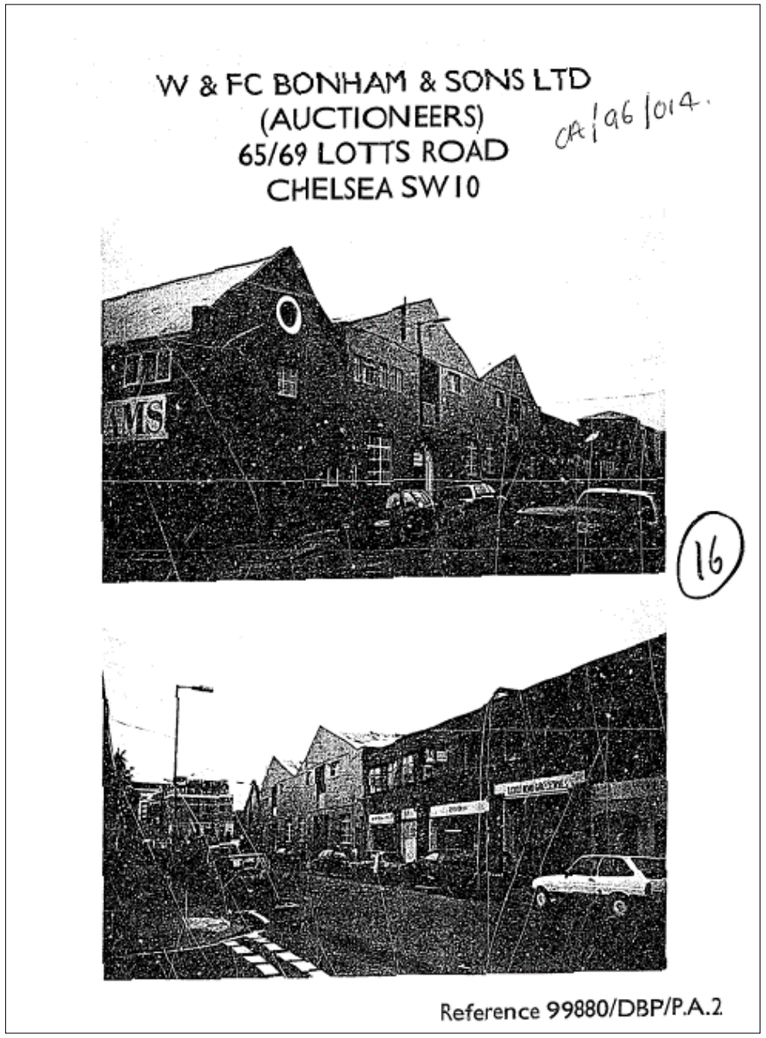


Figure 4.10 Photographs submitted in planning application ref CA/96/014, 65–67 Lots Road. Source: RBKC Microfiche

4.44 Bonham's was founded in 1793 in Tavistock Street, Covent Garden by Thomas Dodd. Premises were opened in Lots Road, Chelsea for the sale of furniture, pictures, and household items in 1958. Bonham's continues to be one of the sole British and privately owned auction houses operating on an international scale.

4.45 The OS map from 1987 shows that by the late 20th century, plans to infill the Creek had been completed and the southern section of the Site was clear of all buildings (**Figure 4.12**).

4.46 The existing buildings on the Site are a large warehouse located at Nos. 71–73 Lots Road, Nos. 65–69 Lots Road and a car park. The buildings can therefore be dated to the late 1900s, with piecemeal extensions and individual units added across several years.

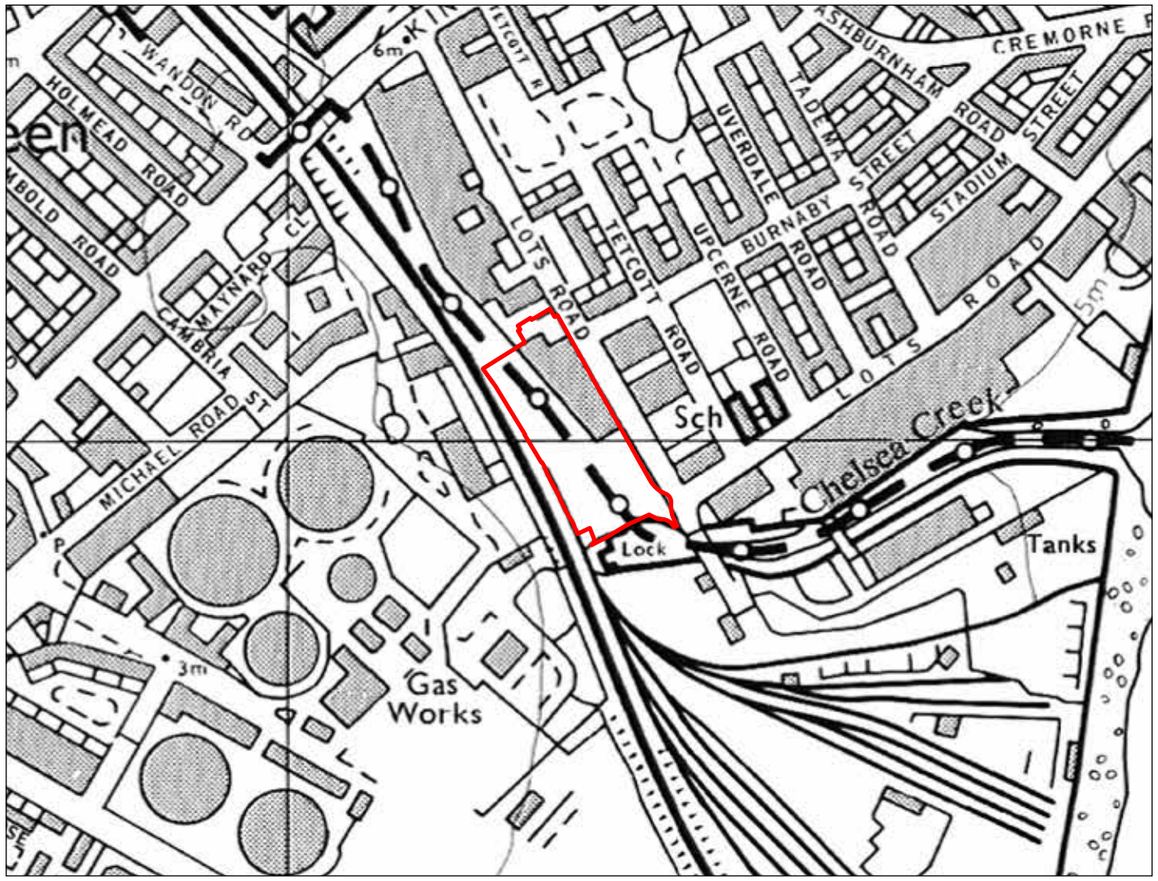


Figure 4.11 1987 OS map. Source: Promap

5.0
BASELINE: HERITAGE ASSETS
LOTS ROAD SOUTH

BASELINE: HERITAGE ASSETS

5.1 This section identifies the heritage assets that may be affected by the Proposed Development and describes their significance and the contribution that setting makes to their significance.

5.2 An initial study area was identified to help determine the likely heritage baseline using desk-based research and a site visit. This was set at a 500m radius from the Site and all heritage assets within the study area were identified – see **Figure 5.1**.

5.3 A ZTV was then produced using VUCITY to test the likely visibility of the proposals across the study area.

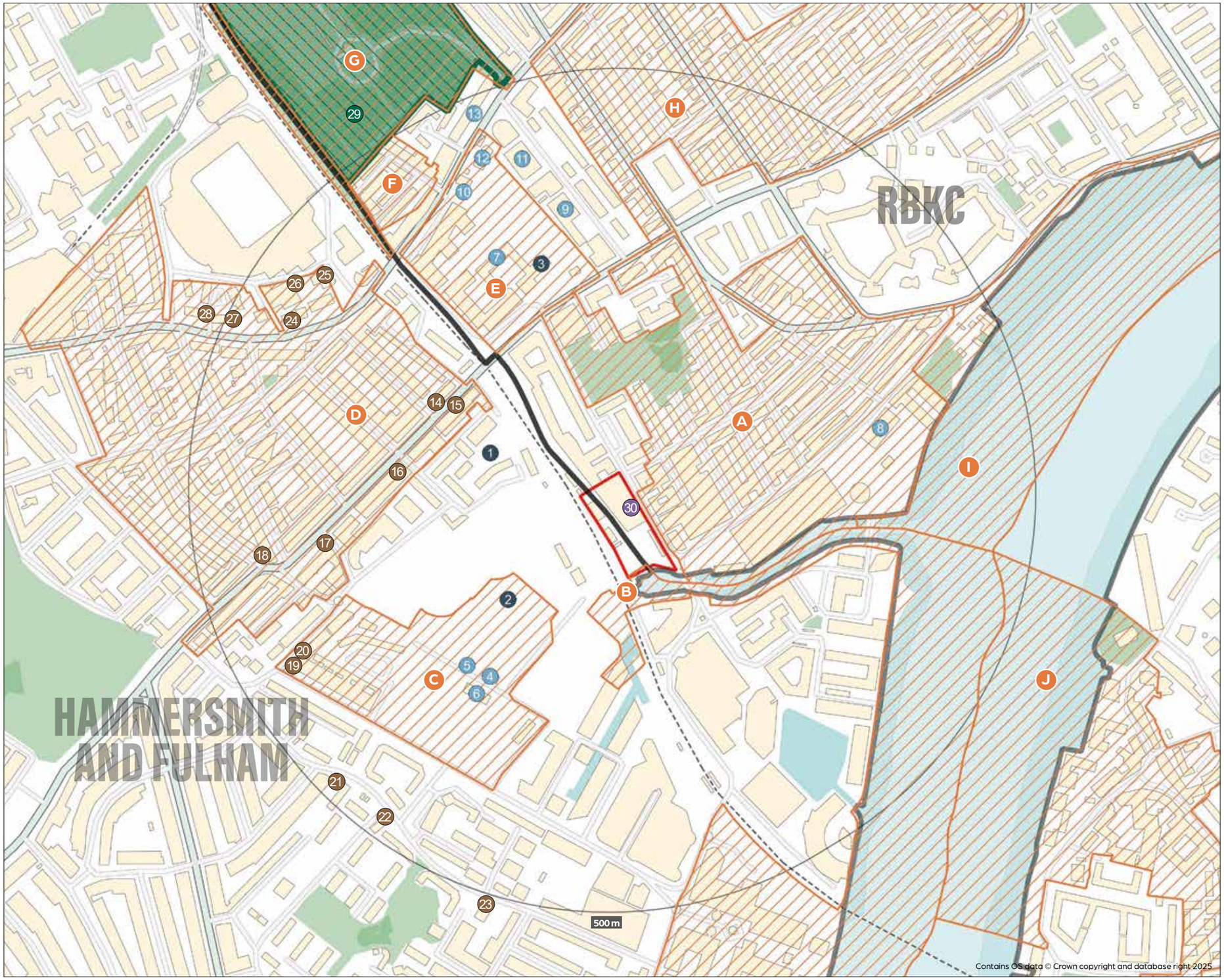
5.4 An overlay of the ZTV and the heritage study area is at **Figure 5.2**.

5.5 In accordance with the proportionate approach set out at paragraph 207 of the NPPF, the ZTV was used to 'scope out' the heritage assets where there would be no intervisibility with the redevelopment of the Site. A desk-based review of each of these assets was undertaken to make sure there were no historical associations which may introduce a non-visual setting relationship with the Site to be considered.

5.6 The remaining assets have been scoped in and their significance and setting is described below.

5.7 The ZTV also indicated where there may be visibility from areas outside the study area and those were subject to further interrogation in VUCITY. In each case, the view of the scheme over a large distance (greater than 500m) would have no material impact on heritage assets in those areas. The exception is Brompton Cemetery to the north of the Site, which is scoped in for assessment. This is also proportionate to the Cemetery's high grading, as a Grade I Registered Park and Garden, and the nature of the asset as a large area of open space.

5.8 A summary of the heritage scope is provided at **Appendix 2.0**.



HERITAGE ASSET PLAN

Application Site

Conservation Areas

A. Lots Village CA
B. Sands End CA
C. Imperial Square & Gasworks CA
D. Moore Park
E. The College of St Mark & St John CA
F. The Billings CA
G. Brompton Cemetery CA
H. Sloane/Stanley CA
I. Thames CA
J. Battersea Square CA

Listed Buildings

Grade II*

1. Sandford Manor House
2. Gasholder No 2, Fulham Gasworks
3. Stanley House

Grade II

4. Office Building at The Former Imperial Gas Works
5. War Memorial
6. Former Laboratory at The Imperial Gas Works
7. Original School Building and Chapel at Former College of St Mark and St John
8. London County Council Pumping Station
9. Carlyle Building at The Hortensia Road Centre
10. Octagon at College of St Mark and St John
11. The Sloane School at The Hortensia Road Centre
12. Chapel at College of St Mark and St John
13. 308–328, Fulham Road SW10

Locally Listed Buildings

14. 562 Kings Road SW6 Former Wheatsheaf P.H.) Locally listed building of merit
15. Metal 'Book sculpture' bench (outside Nos 547 to 557 odd) Locally listed building of merit
16. No. 577 Kings Road Imperial Arms Public House Locally Listed Building f merit
17. 617 Kings Road SW6, Former Hand & Flower P.H Locally listed building of merit
18. No.s 85 & 87 Waterford Rd SW6 Former Gasworks Restaurant– Locally Listed building
19. 1A Imperial Rd SW6 – Locally Listed Building
20. No. 19–33 (Odd) Harwood Terrace SW6 Locally Listed
21. No.s 2–12 (even) Bagley's Lane (SW6) Locally listed building of merit
22. No. 58 Bagley's Lane Queen Elizabeth PH Locally Listed Building of Merit
23. Grove House Day Nursery Locally Listed Building of Merit
24. No.s 410–416 (Even) Hammersmith and Fulham Locally listed building of merit
25. No.s 404 A–D (The Studios) Fulham Road Locally listed building of merit
26. No.s 1–13 (consec) Chelsea Studio's Locally listed building of merit
27. No.s 422–432 (even) Fulham Road Locally Listed building of merit
28. 434–438 (even) Fulham Road Locally Listed building of merit

Registered Park and Gardens

29. Brompton Cemetery – Grade I

Non-Designated Heritage Asset

30. 65–59 Lots Road

LOCATION:
71 Lots Road, SW10 0RN

DATE:
July 2025

SCALE:
1:5,000 @ A3

FIGURE 5.1 Heritage Asset Plan

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

HERITAGE ASSET PLAN OVERLAID WITH ZTV (WITHOUT CONSENTED SCHEMES)

Application Site

Conservation Areas

A. Lots Village CA
B. Sands End CA
C. Imperial Square & Gasworks CA
D. Moore Park
E. The College of St Mark & St John CA
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Registered Park and Gardens

29. Brompton Cemetery – Grade I

Non-Designated Heritage Asset

30. 65–59 Lots Road

LOCATION:
71 Lots Road, SW10 0RN

DATE:
July 2025

SCALE:
1:5,000 @ A3

FIGURE 5.2 Heritage Asset Plan with Overlay of the ZTV

▲ **NORTH**

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HERITAGE ASSETS ON THE SITE

SANDS END CONSERVATION AREA (MAP REF: B)

5.9 A small part of the Site falls within the Sands End Conservation Area (LBHF). This is approximately 408m2 in the south-west corner of the Site comprising land at the edge of Chelsea Creek.

5.10 Sands End Conservation Area was designated in 1991 and the LBHF adopted the Character Appraisal in April 1997.

5.11 The conservation area is in the southernmost part of the LBHF. It recognises and incorporates the historic interest of the development on the north bank of the River Thames between Chelsea Railway Bridge and the Hurlingham Conservation Area. A map of the conservation area is presented at **Figure 5.3**. The north and west boundary extends from the railway bridge at Townmead Road and Carnwath Road to Broomhouse Lane with the south and east boundary following the borough boundary along the centre of the River Thames.

5.12 Originally Sands End was within the Town Meadows area of Fulham. The land here was dissected by creeks and its proximity to the River Thames meant that it was highly susceptible to flooding. Development mostly took place throughout the 1890s with industrial development taking place along the Thames frontage. Raw materials were transported by the river which stimulated the development of the Fulham Power Station and gas works. Residential development within the area took place at the same time and by 1916 the northern area of residential accommodation was largely complete.

5.13 Industrial land use remained the predominant use in the area until the late 20th century when the UK experienced a general decline in traditional industries. Following dereliction and vacancies a vast majority of the land has been cleared for redevelopment with construction still in progress. The *Conservation Area Character Appraisal* (1997) notes that the area is in a period of transition, characterised by change and emerging development. Such change has resulted in a variety of scale and types of buildings and materials being present within the area. Remnant of industry remain, such as the traditional 19th century industrial buildings constructed from red brick and in some cases with stone detailing such as Fulham Wharf Warehouse.

5.14 The river continues to be focal point within the area particularly between Wandsworth Bridge and Battersea Reach, characterising the topography and views of the River Thames, however recent development along the banks of the river has changed this.

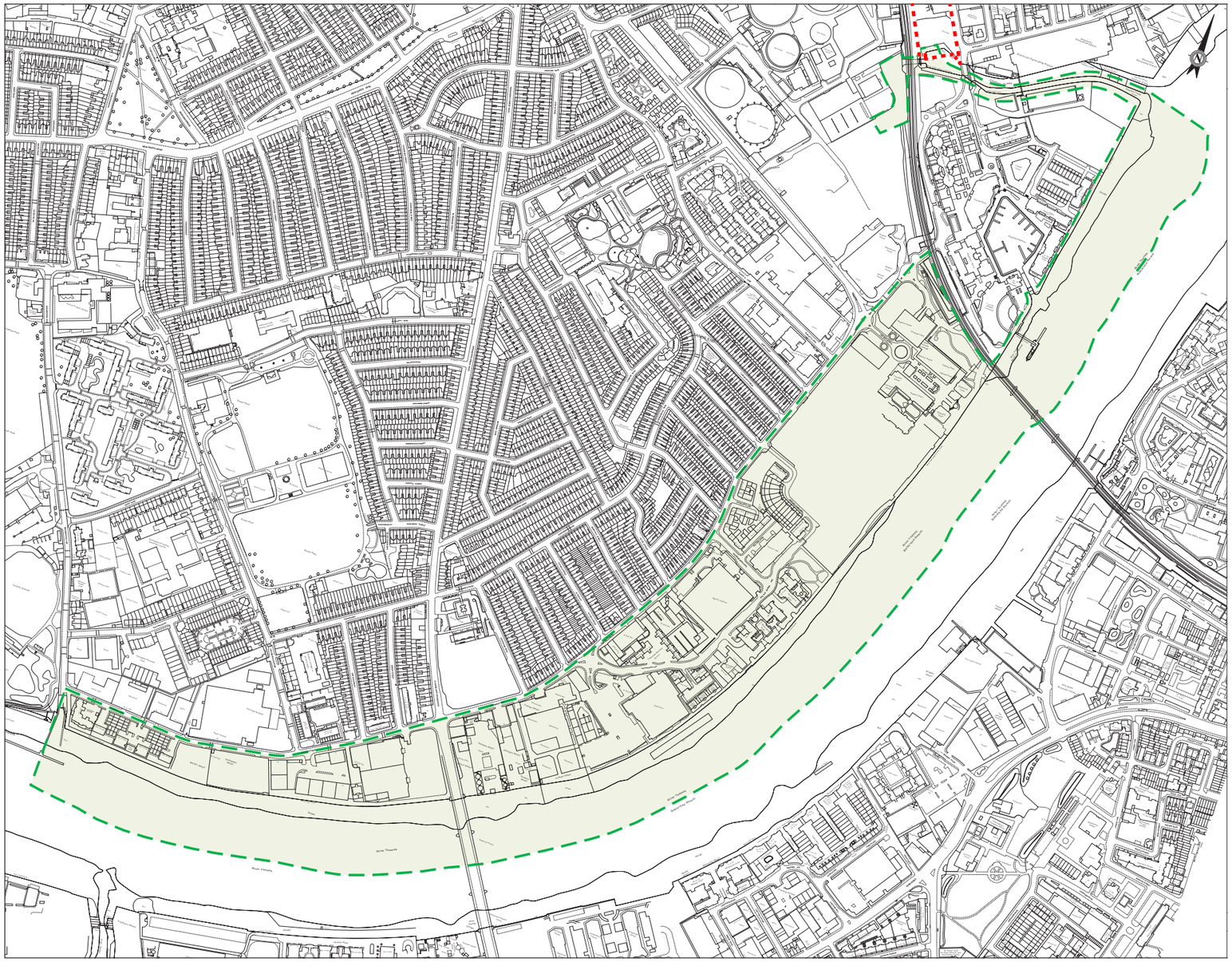


Figure 5.3 Map of Sands End Conservation Area with the Site Indicated in Red

CONTRIBUTION OF THE SITE TO THE CONSERVATION AREA

5.15 The Site forms part of the north edge of Chelsea Creek at the east end of the conservation area. It contributes to the conservation by forming the creek edge, however the condition of the creek edge would benefit from improvement.

5.16 The remainder and large part of the Site is within the setting of the conservation area. The conservation area does not draw any of its significance from the Site and the hardstanding at the edge of the conservation area does not provide an attractive immediate setting.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.17 The Sands End Conservation Area comprises a narrow strip of land sweeping along the river front south of the rail line, extending north incorporating the river itself and the Chelsea Creek that form the southern boundary of the Site. The setting as existing is varied. Both of the River and Creek continue to provide significant contribution to the setting of Sands End, due to historic uses of the river associated with industrial activities that took place within the area.

5.18 Lots Road Village, also a designated conservation area, makes a positive contribution to its significance. The fine urban grain and Victorian terraced houses remain well preserved and their spatial relationship to the Sand End Area is largely as it was originally.

5.19 However, the area to the north fronting the river is described within the conservation area appraisal as being in 'transition'. The original setting was previously characterised by large industrial buildings that remained in active use until the 1980s. Following a period of decline in traditional industries, the surrounding area experienced extensive clearance and dereliction. The setting of the conservation area at present is characterised by extensive redevelopment, the most notable of which includes the Imperial Gas Works regeneration scheme (currently under construction) and Chelsea Waterfront development south of Chelsea Creek extending to the rail line. These areas provide a limited contribution to the significance of the conservation area.

NOS. 65-69 LOTS ROAD

5.20 The brick-built warehouses on the Site at Nos. 65-69 Lots Road are identified as non-designated heritage assets. The warehouses were likely built in the 1920s based on historic photographs (see **Figures 4.6 and 4.7** at **Section 4.0**). They are therefore interwar industrial buildings. The narrower building at the south end is likely to be late-19th or earlier in the 20th century in date.

5.21 The non-designated heritage asset has a large rectangular footprint. There are three bays beneath two wide gables with a narrower building of a single bay under a gable to the south. The building is brick which is painted in a dark grey colour to Lots Road and exposed to the rear. The openings in the elevations have an industrial character, including doors at the first floor level for access. The roofs are metal. It is understood that there have been substantial internal alterations.

5.22 The buildings are identified as non-designated heritage assets for their age and historic industrial character. The buildings are typical of their type, however, and they have been much altered. They therefore have very low significance.

Figure 5.4 Photograph of Nos. 65-69 Lots Road

HERITAGE SETTING CONSIDERATIONS

CONSERVATION AREAS

LOTS VILLAGE CONSERVATION AREA (MAP REF: A)

5.23 Lots Village Conservation Area was designated by RBKC in November 2014 and the Conservation Area Appraisal was adopted at the same time.

5.24 A map of the conservation area is presented at **Figure 5.2**. The conservation area is located at the south-west edge of the RBKC on a bend in the River Thames and on the boundary with LBHF. The physical boundaries are defined by the River Thames to the east, Chelsea Creek (now the railway to the south-west) and the Kings Road to the north. These constraints create a degree of isolation and detachment from surrounding urban areas and create a sense of character separate from areas outside its boundary.

5.25 The history of the conservation area is described at **Section 4.0** and not repeated here.

5.26 The buildings are predominantly late Victorian residential terraces built in the 1880s, characterised by fine urban grain and small building plots. The heights of buildings range between two and four storeys, with bulk and massing increasing towards the south and west of the conservation area where land uses are more commercial and industrial.

5.27 The main materials used for buildings in the area are yellow stock brick, followed by red brick. Overall, the area presents itself cohesively with few single houses within terraces painted compromising the uniformity and historic brickwork.

5.28 The surrounding industrial development on the perimeter of Lots Road has a strong spatial relationship to the smaller scale residential terraces located within Lots Village and adds to its sense of seclusion.

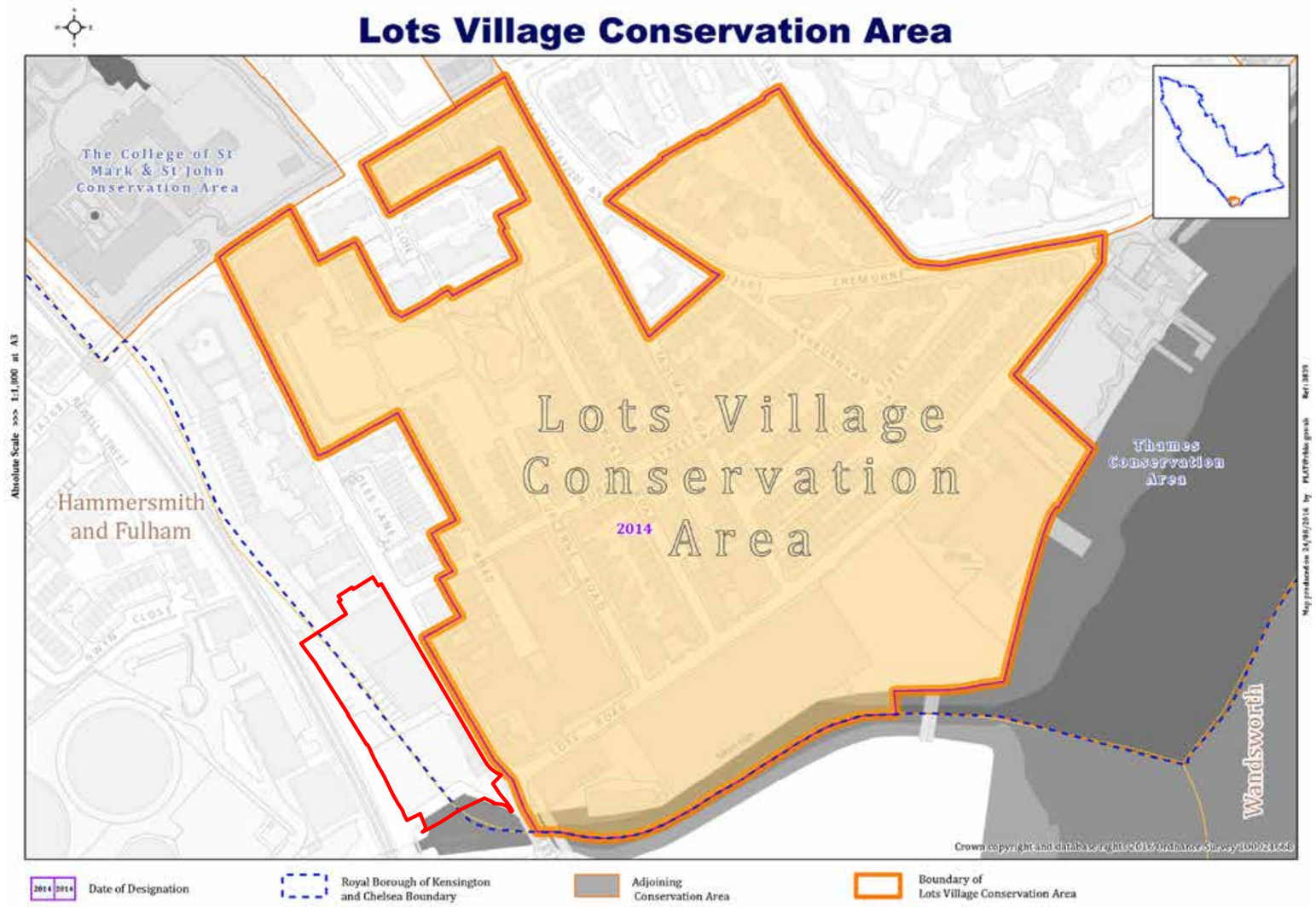


Figure 5.5 Map of Lots Village Conservation Area with the Site Indicated in Red

5.29 The *Conservation Area Appraisal* (2014) identifies the key features that comprise the character and significance of the conservation area:

- An area of diverse uses: commercial, industrial, retail, leisure, educational and residential.
- Well preserved Victorian terraced housing of the 1880s with original architectural details.
- Varying details between terraces particularly with regards to stucco mouldings and cast-iron railing designs.
- Views of Victorian butterfly roofs, chimneys and pared additions to the rear of houses.
- Historic commercial and social uses at corner sites (pubs and shops) historic parade of shops on the King's Road.
- Industrial buildings and uses on Lots Rad dating from the early and late 19th century.
- Tranquil streets with trees, York stone paving, traditional lamp posts and original railings at front areas.
- Green space at Westfield Park.
- Wharf Buildings fronting the River Thames.
- Creative and artistic businesses and institutions including specialist retail shops selling furniture, art, antiques as well as interior design businesses, auction houses, Chelsea Academy and the 606 Jazz Club.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.30 The setting of the conservation area does not make any contribution to its significance. The Conservation Area Appraisal identifies that the area has *"a certain level of detachment and isolation from the surrounding urban areas"* (paragraph 1.7) and goes on to state that: *"the area's setting is not obviously influenced by the River Thames, which has not been visible from the vast majority of residential streets for over a century. Taller buildings on the periphery, or immediately adjacent to Lots Road (eg. Lots Road Power Station and the World's End Estate towers), create an area that is focused inwards. These taller buildings terminate views within the area along streets looking south and east"* (paragraph 1.8).

5.31 The Site is located at the west boundary of the conservation area on the opposite side of Lots Road and forms part of its immediate setting. However, there are no important historical associations between the development in the conservation area and the Site, aside from being part of the evolution of the area, and visibility is also limited as there are only partial or glimpsed views of the Site from within the conservation area.

5.32 Lots Road itself is part of the varied wider townscape that surrounds the conservation area. As noted by the appraisal, the conservation area is inward-focussed and does not draw any significance from its setting.

IMPERIAL SQUARE & GASWORKS CONSERVATION AREA (MAP REF: C)

5.33 Imperial Square Conservation Area was first designated in August 1975 with its boundaries extended in February 2005 to include the adjoining buildings in Harwood Terrace and Imperial Road as well as the northern part of the gasworks site that is linked to the history of the houses in Imperial Square.

5.34 The conservation area boundary can be seen on the map included in **Figure 5.5**. The boundary predominantly follows the perimeter of the gas works- following the centre line of Harwood Terrace to the north-west, including the full width of Sands End Lane at its north end, and bounded by Imperial Road to the south-west to the entrance of the gas works site, following its centre line north-east including the full width of Sands End Lane. The boundary then follows the north-east side of Sands End Lane to the junction with the service road east of the former office and laboratory buildings, then running northeast along the centre lie of the road to a point where it crosses the site in a northwest direction to include the gas holders, finally running southwest to rejoin Sand End Lane and until it northeast side meets the centre lie of Harwood Terrace.

5.35 The history of the conservation area is described at **Section 4.0** and not repeated here.

5.36 The *Character Appraisal* (1997) identifies two distinct sub-areas within the conservation area, described below.

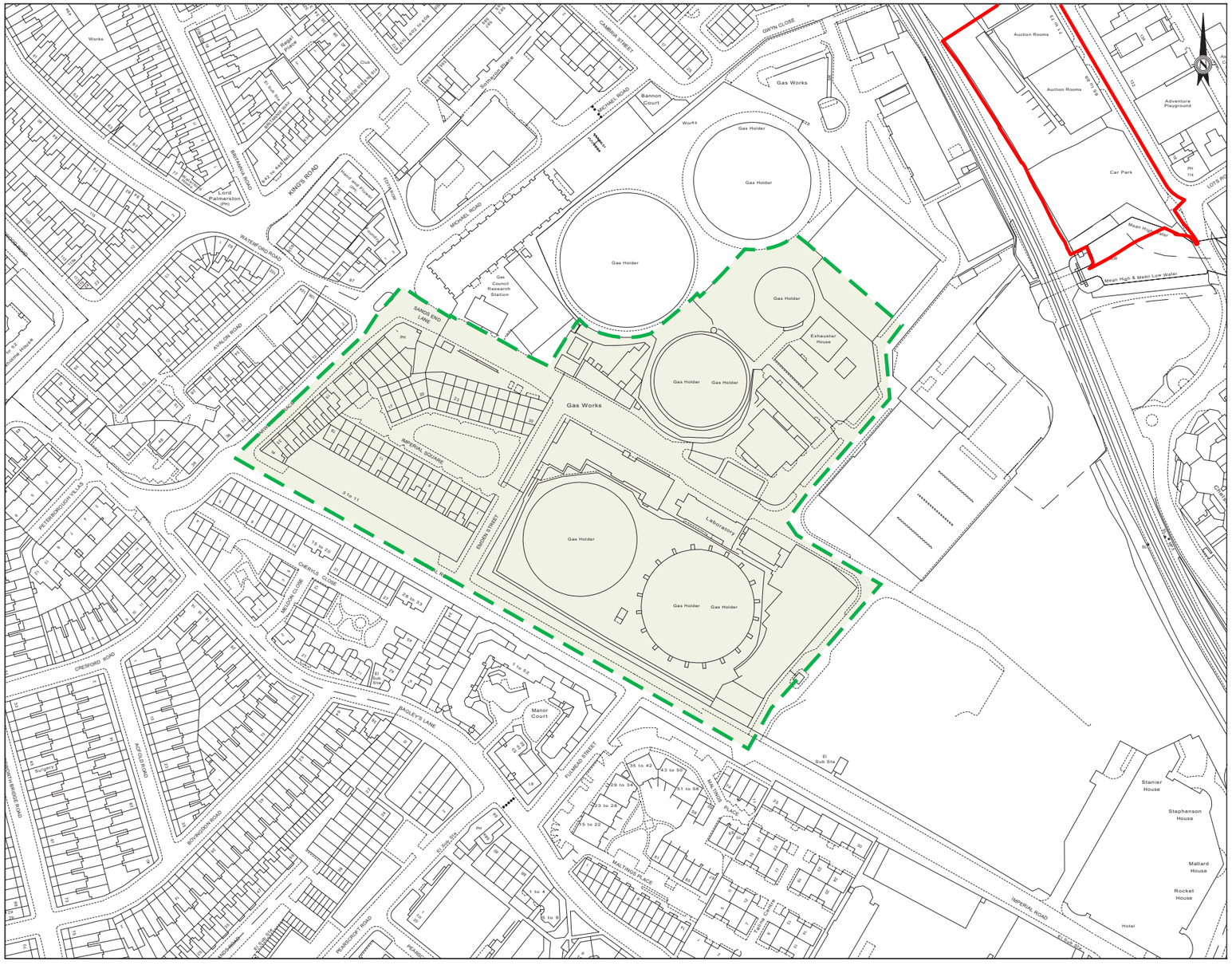


Figure 5.6 Map of Imperial Square & Gasworks Conservation Area with the Site Indicated in Red

IMPERIAL SQUARE AND ADJOINING BUILDINGS

5.37 Imperial Square and it's adjoining buildings are a compact and cohesive development, predominantly two storeys in height and Victorian terraced cottage style. The buildings have a consistent form, line and materials and are arranged around a three-side trapezoidal central open area. The properties on Harwood Terrace were developed in the early 19th century around the junction with Sands End Lane, however none of the original buildings remain although the existing buildings are of a sympathetic scale to the Imperial Square cottages.

IMPERIAL GASWORKS HISTORIC CORE

5.38 The gasworks remains an important part of London's riverside industrial heritage and the River Thames historic use as a working river bordered with a variety of factories, breweries and other industrial works. The construction of the tidal Kensington Canal in 1924 which required the widening of Counter's Creek formed a primary through route supplying the gasworks. The Imperial Gasworks Dock constructed to link to the canal in 1856 was enlarged in the 1860s to allow an increased delivery of coal to gasworks. While the canal has since been filled in the Dock remains and the southern end of Chelsea Creek now lie outside of the conservation area boundary to the south-east.

5.39 The site comprised seven gasholders in total with varying significance. No. 2 was designated as a Grade II listed building in 1970 in recognition of its rarity and age as one of the oldest remaining gas cylinders in the world. Other buildings with associated and historic significance such as the Chief Engineers office and research laboratory are also Grade II listed and located within the conservation area.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.40 The conservation area does not draw any particular significance from its setting which is mainly defined by mixed residential development. There are the opportunities for views into the conservation area from the surrounding area where streets are on alignment. The separating land and railway line provides physical separation from the Site and the wider setting to the north-east in the RBKC. Similarly, the conservation area does not draw any significance from this part of its setting and there is no visibility or historical associations between the conservation area and the Site.

5.41 It is noted that setting of the conservation area is undergoing transformative change through the Kings Road Park masterplan.

LISTED BUILDINGS

SANDFORD MANOR HOUSE (GRADE II*) (MAP REF: 1)

5.42 Sandford Manor House (formerly Nos. 1 and 2 Sandford House) was designated in May 1954 as a Grade II* listed building.

5.43 The name is derived from ancient 'sand' or 'sandy' ford which once existed where Stamford Bridge now stands.

5.44 The house is surrounded by trees within the premises of the former Gas Light and Coke Company in the Sand End area accessed via Gwyn Close from the South and Maynard Close to the north.

5.45 The building is likely to have been built in the late 17th century and contains historic interest as one of the earliest residences within the Sand's End Area pre-dating the industrial development that took place in the 19th century.

5.46 The two-storey building is constructed of brick with a rough cast iron front and dormer windows. The roof is a slate mansard with a twin valley roof behind the parapet with a cornice and blocking course. Five casement windows front the property with timber mullions and transoms and a wooden doorcase with panelled pilasters, consoles, and open pediment. Internal features of the building also contribute to its significance, with the property known to contain a panelled hall and oak staircase with moulded strings and handrail, turned balusters and quare newels.

5.47 The property is known to have undergone alterations in 1844 when the Manor House was modernized. Changes largely affected the front of the building, where previously three gables were existing, now only one remains in the centre having a round pediment and those either side central with a pair of windows below finished with a pointed pediment. Despite alterations, its historic character and architectural features have on the most part been retained, and the property is considered architecturally valuable.

5.48 Joseph Addison (1672-1719), an English playwright, poet and essayist is known to have lived within the Sands End Area, while unknown whether he resided within the Manor House itself, in a number of his works throughout the 1700s he comments on the rural character of 'Sandy End' where there was a hamlet of that name near to the Creek.

5.49 In the 19th century the property was used for a number of manufacturing uses, consistent with development taking place in the surrounding area. In 1811 the property was purchased by Messers. Brown & Co. and was turned into a patent cask factory, following which in 1815 in the campaign against Napolean the firm made large numbers of wooden canteens for the use of soldiers on their marches. Later in 1821 the premises were bought by Mr Robert Lyon for the purposes of bleach and dye works and in 1824 the Gas Light and Coke Company purchased the Estate. The building at this time was then divided into two distinct residences, as it remains today.

5.50 Sandford House is also recognised for its historical associations. Rumours of Nell Gwynn (1650-1687), a stage actress and long-time mistress of Charles the II is also believed to have resided in the house for some time.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.51 **Sandford House is located within a large garden, surrounded by trees. This immediate setting of green space and trees surrounded** by **high walls contributes to its setting by providing a degree of enclosure to the listed building. This** offers **limited views of the house, with long distance views of its architectural and historic value occluded by interposing development.**

5.52 The gardens are bounded by properties at Nos. 1-10 Gwyn Close to the South and Nos. 1-5 Burford Walk to the west, Nos. 10-12 Maynard Close and Astor Court Warden Office on Maynard Close to the north (all within 50m of the house) and the rail line to the east.

5.53 The original setting has changed considerably. Previously characterised by traditional agricultural open holdings the surrounding land has now been developed extensively to provide residential accommodation. Imperial Gasworks site in proximity is also under construction and will also impact the setting.

5.54 The Site is part of the listed building's wider setting and there is no direct or important intervisibility or historical associations between the two. The Site does not, therefore, form part of the setting or significance of the listed building or provide any appreciation of its significance.

LONDON COUNTY COUNCIL PUMPING STATION (GRADE II) (MAP REF: 8)

5.55 The London County Council Pumping Station was designated as a Grade II listed building in November 2007.

5.56 The building was erected in early 20th century by the London County Council Works Department under Chief Engineer Sir Alexander Binnie followed by Sire Maurice Fitzmaurice in a classical style and became operational in 1904.

5.57 Located on the eastern section of Lots Road at No. 21 the site is adjacent to the Power Station development. Immediately adjacent to the Pumping Station on the opposite side to the Power Station is the Chief Engineer's house built at the same time and in a similar style and materials. This building is still occupied by the staff and forms part of the curtilage to the Pumping Station, listed by way of its associated use and history.

5.58 The building served the expanded London Main Drainage System, pumping storm water into the River Thames. A number of pumping stations were built across London in the 19th and 20th centuries including three by the Metropolitan Board of Works, later known as the London County Council, several of which have now been demolished or redeveloped.

5.59 The station was originally powered by gas engines with the plant altered in the early 1930s with the installation of the present diesel combustion engines, by Belliss & Morcom. This firm is better known for the manufacture of compressors than combustion engines. The rarity of this product adds some interest. Further modifications took place in the late 1950s and early 1960s including the addition of a further three small pumps.

5.60 The building form is rectangular with the majority of the plant on the ground floor other than pumps and water outlets located at basement level. The principal elevation is to the northwest, flanking Lots Road served by a large central panelled double door to the roadside façade and a further pair of large double doors in the north-east elevation. The building comprises a slate roof and has nine bays on the front elevation with the central three projecting. The materiality of the building relates to the Power Station to the west, composed of glazed red brick to impost level and red brick above with terracotta designs and plaques reading 'London', 'County' and 'Council'. Windows are defined by paired round arches and have iron glazing bars, with terracotta keystones and mouldings. North-east and south-west elevations are similarly treated although have pedimented gables with oeil-de-boeuf windows. The pumping station is surrounded to its north-west and south-west by a low red brick wall with projecting piers and iron railings. Iron gates allow access to the main west entrance.

5.61 In the 1930s the ground floor provided office accommodation in the central south-eastern part of the building. Fuel and water tanks occupied ground and mezzanine level. The plant was also located on ground floor level comprising an electricity supply area, combustion engines, gear boxes, and historic gauges, signage and clock all dating from the 1930w. The basement is accessed by stairs at the north-east and south-east of building. These have metal balusters and wooden banisters and lead down to the pumps and storm water outlet pipes, five of which are date stamped 1931 and 1932.

5.62 The Pumping Station provides a high-quality example of Edwardian public utility architecture and remains one of the earliest and best surviving examples of a storm water pumping station by the Metropolitan Board of Works and LCC.

5.63 The building has been minorly altered from its original form. Later additions by way of secondary fixtures, fittings, office accommodation, plant, and gauges in the 1930s also offer historical interest.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.64 The Lots Village Conservation Area forms part of the immediate setting of the pumping station. The buildings on the southern periphery are of an industrial and commercial character. However, the majority of buildings to the north are characterised by residential use. The buildings here are of a more domestic scale between two and four storeys in height and comprise late Victorian terraced houses, built in yellow stock brick.

5.65 To the rear of the building is the River Thames, whilst no longer visible from the street it maintains its spatial relationship that is relevant to its historic and indeed present use.

5.66 Taller buildings are more common on the southern perimeter of the conservation area and are typically constructed of red brick, the Power Station adjacent to the pumping station serves as a prime example. This creates an inward focus towards Lots Village.

LISTED BUILDINGS AT THE IMPERIAL GASWORKS

GASHOLDER NO 2, FULHAM GASWORKS (GRADE II*) (MAP REF: 2)

5.67 No.2 Gasholder was listed in May 1970 at Grade II*.

5.68 The gasworks at Sands End, Fulham, was established in 1824 when the Imperial Gas Light and Coke Company founded in 1821, purchased the Sandford Manor estate. The area, previously agricultural, began to industrialise in the early 1800s with the development of the Kensington Canal. Gas lighting using coal was invented in the 1790s in Lonon and its use increasing exponentially across the country in the years that followed. The gasworks are a surviving remnant of the industrial development that took place throughout the 1800s.

5.69 The No.2 Gasholder was built between 1829 and 1830. The structure comprises 12 free-standing cast-iron guide standards ('tripods') which served as buttresses supporting a water-sealed bell (gas vessel) at it rises and falls from the in-ground tank. They were possibly the first of their kind, used across the company's three works and certainly the largest with a total capacity of 226, 000 cubic feet and each tripod reaching 30 feet in height.

5.70 The Imperial Gas Light and Coke Company quickly became a major company in the UK with works on the Regent's Canal at Shoreditch (1823) and St Pancras (1824). An initial pair of gasholders was erected in 1825 by the company engineer Samuel Clegg used to store gas manufactured at the St Pancras Works. The completion of the canal and construction of a retort house in 1829 allowed gas production to begin on site with barges delivering coal via a lock leading off Chelsea Creek on the north side of the River Thames. The gasworks at Sands End continued to expand under Clegg's successors with the No 2 Gasholder built in 1829–30 to the designs of John Kirkham of the Imperial Gas Light and Coke Company.

5.71 By 1869 the site had grown extensively now comprising five gas holders (Nos. 3, 4 5 all since demolished and replaced), retort offices and other ancillary buildings with another two holders (Nos. 6 and 7) added between 1878 and 1880 and a research laboratory in 1927.

5.72 The company was nationalised in 1949 as the North Thames Gas Board which established its London Research Station at Sands End in 1968. By this time most of the early gasholders had been reconstructed as spiral-guided holders, ultimately leaving only Nos 2 and 7. Fulham No 2 Gasholder was in use until 1971.The works began the process of decommissioning in 2010 with the eastern part of the site cleared for redevelopment and the remaining buildings let for other uses.

5.73 As the oldest surviving gas cylinder in the world the site retains significant historic interest.

5.74 Architecturally it serves as a unique example of the pioneering gas industry throughout the Georgian period. It is an exceptionally rare type of gasholder of which no other examples remain. At the time of erection, it represented a remarkable feat in design and engineering- breaking records in size and capacity- approximately twice the diameter of other large gas cylinders at that time. Despite its age the structure has survived relatively will and remains largely unaltered with the original cast-iron guide standards, brick tank and wrought iron framework for the bell (gas vessel).

5.75 The tripod form of guide standards were the forerunner of buttress styled cast iron standards used throughout the 1870s whilst the has bell was particularly innovative with a sophisticated trussing system that became widely used in later gasholder bells.

OFFICE BUILDING AT THE FORMER IMPERIAL GAS WORKS (GRADE II) (MAP REF: 4)

5.76 The Office Building was Grade II listed in June 2007.

5.77 The building was built in 1850 and is believed to be the work of Francis Edwards, built to provide office space in association with the Imperial Gas Light & Coke Company and as such provides group value when it's relationships to other gas works buildings are taken into account.

5.78 The main elevation of the building comprises five bays with lower two-storey continuation to the south. The door is set within a moulded architrave with overlight. Windows are similar set within moulded surrounds. Entablatures at first floor and cornice level also provide architectural interest. Sunken panels beneath

5.79 The interior of the building contains an open well stone staircase, with cast iron railings. The entrance is lines with tiles and some plasterwork and joinery to tall ground floor rooms, including moulded window surrounds remain in-tact.

WAR MEMORIAL (GRADE II) (MAP REF: 5)

5.80 The war memorial located within the Imperial Gas Works was listed Grade II in June 2007.

5.81 The memorial was erected in 1920. It comprises a rendered plinth with moulded coping supporting two bronze inscription panels, and an enamelled badge of the Gas Light and Coke Company, dated 1824, when the Gas and Coke Company was established.

5.82 The upper panel bears a relief of an armoured, winged figure depicting St Michael, with the inscription '*THESE MEN DIED FOR THEIR COUNTRY*' and below that the inscription '*1914-1919. The Gas Light and Coke Company*' is inscribed with ten columns of names of the dead. The lower panel sports another ten columns of names of the dead with the inscription '*TO THE MEMORY OF THOSE MEMBERS OF THE COMPANY WHO GAVE THEIR LIVES IN THE WAR OF 1939-45. REQUIESCAT IN PACE*'. The earlier plaque is Grade II listed however, the later memorial has been re-set on a modern brick plinth and is not listed.

5.83 The Historic England listing description, notes that the memorial provides a *"fairly unusual example of a company war memorial"*.

FORMER LABORATORY AT THE IMPERIAL GAS WORKS (GRADE II) (MAP REF: 6)

5.84 The Former Laboratory was listed at Grade II in June 2007.

5.85 The listed building as built in 1927 and located centrally within the Imperial Square and Gasworks Conservation Area the building sits on the southwest side of Sands End Lane and i**mmediately opposite the Chief Engineer's Office.** The building serves as a good example of neo-classical style architecture designed by Sir Walter Tapper (RA, FRIBA).

5.86 Originally built by the Imperial Gas and Coke Company as a research laboratory and school for apprentices in the interwar years. Historic England's list entry notes that it has a strong group value with other structures owned and operated by the Imperial Gas and Coke Company.

5.87 The building is constructed of Brick and Portland stone, two storeys in height from the outside although internally comprises three storeys. The building has a parapet with stone cornice and pedestals, a stone string course and a stone clad semi-basement. Windows are metal framed and in the form of a sash which appear large in the elevations. The front entrance is accessed via a double staircase at raised ground floor level and the doorcase is set within a moulded architrave with open segmental pediment carried on consoles above, with date stone.

5.88 The internal design of the building contains an open-well staircase at the north-end with bronze handrail, Roman style ironwork and triple arched openings to each landing, Otherwise the interior is utilitarian and functional and does not contribute to the asset's significance.

5.89 The Laboratory was originally intended to be twice as long and to a much grander than the original laboratory which it was to replace, however only the northwest range was completed. An unusual feature is the orientation of the detailing of the building. The doorway now perceived as the rear facing Gas Holder No. 7 has a stone doorcase with console brackets and broken segmental pediment with a central panel inscribed 'AD 1927', suggesting at the time of construction this served as the main entrance.

5.90 The plan form has been obscured by later sub-division of the building however much of the original detail survives throughout.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.91 The setting of the listed buildings comprising the former gasworks is recognised and defined by the conservation area designation which contributes positively to their significance as forming the historic context for the assets. The listed buildings do not draw any significance from the wider setting including the Site.

DISTANT HERITAGE ASSETS

BROMPTON CEMETERY

5.92 Brompton Cemetery is recognised as a Grade I Registered Park and Garden ('RPG') and conservation area. It is identified for assessment because the Proposed Development may appear in distant views from the Cemetery. Those views would include the Grade II* listed Anglican Chapel.

5.93 Brompton Cemetery is a mid-19th century public cemetery designed by architect Benjamin B. Baud. Baud won a competition to design the Cemetery and also designed several of the buildings within the Cemetery. Baud is a relatively obscure architect, but it is noted that he worked on the rebuilding of Windsor Castle with Jeffry Wyatville between 1826-1840. Brompton Cemetery is one of the 'Magnificent Seven' cemeteries in London.

HISTORIC INTEREST

5.94 Brompton Cemetery is of high historic interest for the following reasons:

5.94.1 It is one of the most elaborate and impressive of the first wave of private cemeteries in London, reflecting the arrival of the privately funded garden cemetery inspired by the model of Père Lachaise Cemetery in Paris.

5.94.2 It was one of the first of the new cemetery companies (seven in all established in London by the 1840s) to meet the needs of an expanding metropolis, replacing churchyard burials with planned environments.

5.94.3 In its architectural design and layout it reflects the ambition of early Victorian society in creating burial places for its dead, centred around an Anglican chapel (the Church of England Chapel, Grade II* listed) which was highly unusual in its classical design and relationship with other buildings, with an unmatched formal symmetry.

5.94.4 It embodies emerging Victorian approaches to different sorts of burial, from traditional earth burials to extravagant catacomb burial: while they were not the earliest such buildings, they remain the largest such structures in any British cemetery.

5.94.5 It's superb series of monuments, ranging from the 1840s to the mid-20th century, constitutes one of the best groups in any British cemetery, placed within a deliberately conceived landscape setting, and which provide many insights into London society of the 19th and 20th centuries.

5.94.6 It's singular history, which involved the failure of the original company and its acquisition by the Government, making it the only state-owned garden cemetery of its day.

5.95 The cemetery also has ecological and natural value, reflected in its designation as a site of local nature conservation value.

5.96 The proliferation of memorials within the great circle particularly is a departure from the original scheme and reflects population growth and associated urban development beyond what was anticipated. The use of land, which was otherwise set aside for landscape and architectural reasons, for burials, reflects these developments in the wider city graphically.

5.97 Following a period of closure for new burials, the cemetery is open for burials once again.

ARCHITECTURAL INTEREST (INCLUDING ITS LANDSCAPE VALUE)

5.98 Brompton Cemetery is architecturally significant (including in relation to layout and landscape) for the following reasons.

5.98.1 For its overall architectural character, of a form unmatched by any other British cemetery, and reflected in its high grading.

5.98.2 For the Grade II* listed Church of England Chapel, which was designed by Baud to a high degree of finish and which, unusually, drew on Italian Renaissance sources rather than the more conventional Neo-classical or Gothic Revival forms; the location of the chapel, along the central axis flanked by the catacombs, endows it with great presence particularly in views from the north.

5.98.3 For the remarkable flanking ranges of colonnades and catacombs flanking the chapel, which combine traditional cloisters with the emerging category of the subterranean burial complex, in a singular plan form and which sport fine funeral cast iron grilles: cumulatively these create a fine architectural group at the heart of the cemetery.

5.98.4 For the monumental entrance gateway and screen on the Old Brompton Road (Grade II* listed, see separate entry), which is a particularly imposing example of the genre which creates a memorable approach to the cemetery, enhanced by trees.

5.98.5 For the very high interest of the monuments, as reflected in the listed status of 28 individual tombs (one at Grade II*: the Leyland sarcophagus by Burne-Jones). These range from the sculpturally significant to the symbolically singular and constitute one of the best collections of memorials in any British cemetery.

5.98.6 These structures include great lengths of substantial brick boundary walls, creating physical security and providing a seemly and enclosed environment for the commemorative and religious purposes of the landscape.

5.98.7 The plan form of the cemetery departs from the picturesque arrangement and organisation of the other historically important cemeteries in London of this period. Brompton Cemetery has a symmetrical plan about a single, long central avenue, that stretches from the entrance to the entrance of the Church of England Chapel. The great circles are symmetrical mainly.

LAYOUT: HIERARCHY AND EXPERIENCE

5.99 There is a difference in hierarchy and intention as between the main approach from the north and the contrasting arrangements to the south.

5.100 The former, from the north, is clearly the status axis, the view terminating in the chapel and hemicycle.

5.101 The approach from the south is not axial, skirting around the Church of England Chapel, and the entrance gate in the distance has no real presence because of the closely spaced trees along the north half of the avenue.

5.102 The architectural conceit, therefore, is theatrical, and redolent to some extent of country house design: a grand gate, a tree lined drive, and then a sudden reveal of an architectural composition appreciated over a defined distance.

5.103 Given the strong alignments in the cemetery, the defined use and well-marked boundaries, the cemetery has an enclosed quality. Views within it follow the axes and routes in the plan.

5.104 The land between the great circles and the start of the lime avenue was meant to be enclosed by more lime trees, which would have enclosed the view. Thus, the open character of that axial view today, in its middle range, is not as originally intended and undermines the cohesiveness of the design's intended integration of architecture and landscape. Thus, the design concept looking north from the chapel is not as intended.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

5.105 Originally the cemetery setting comprised open land (market gardens, for example, typical of urban fringe areas) and the Kensington Canal. The cemetery boundary was, and still is, well defined and secure, and the edges planted. There is no indication that there was any planned view out from it, over rural land, exploiting that setting for aesthetic purposes. It was self-contained: a place for inward reflection.

5.106 By the 1860s that rural setting began to be transformed, through relatively dense terraced housing and the railway (replacing the canal).

5.107 In the 20th century there was further change, particularly on the west side – the construction of Lillie Square, for example, and the Stamford Bridge football ground. Beyond the Church of England Chapel, the chimneys of Lots Road Power Station can be discerned, and now the pair of residential towers, along with an earlier generation of tower development and more

recent tall development. On the west side, to the north, the treeline is punctuated by the Empress State Building and for many years the old exhibition centre was a notable feature on the skyline.

5.108 Thus, the cemetery's setting is much changed. The increased urbanisation of its setting and the physical manifestation of which has resulted in a direct impact to the character of Brompton Cemetery and the way the land itself is used for leisure (essentially it is used more intensively than it was originally). The proximity to Stamford Bridge means the cemetery is often used as a through-route on match days, and it is also used for commuting purposes. It is used as a place to walk and dwell as one of the principal green spaces in the area. As a result of the urban setting and the way in which the cemetery is used by visitors and residents/commuters, the cemetery does not have a tranquil character, but rather one defined by movement.

5.109 Trees within the Cemetery maintain a sense of physical enclosure from the surrounding areas. Notwithstanding, the character of the Cemetery as a place for inward reflection is not affected by changes to built form within its setting. From its inception, the Cemetery has been a place well-defined from its surroundings.

5.110 The Cemetery has a strong axial arrangement, and the primary, designed view looks north to south towards the Chapel. The Site does not currently appear in that primary view.

6.0
BASELINE TOWNSCAPE
LOTS ROAD SOUTH

BASELINE TOWNSCAPE

6.1 This section identifies the townscape study area and describes the value of the Townscape Character Areas in accordance with the methodology at **Section 2.0**.

TOWNSCAPE ANALYSIS AND SCOPING

6.2 The townscape analysis has been based on study area comprising a 500m radius from the Site. The study area is based on the ZTV and an understanding of the nature of the existing townscape character and the Proposed Development.

6.3 The townscape surrounding the Site may be categorised into 13 Townscape Character Areas (TCAs) which are the townscape baseline for the purposes of this assessment – see map at **Figure 6.1**.

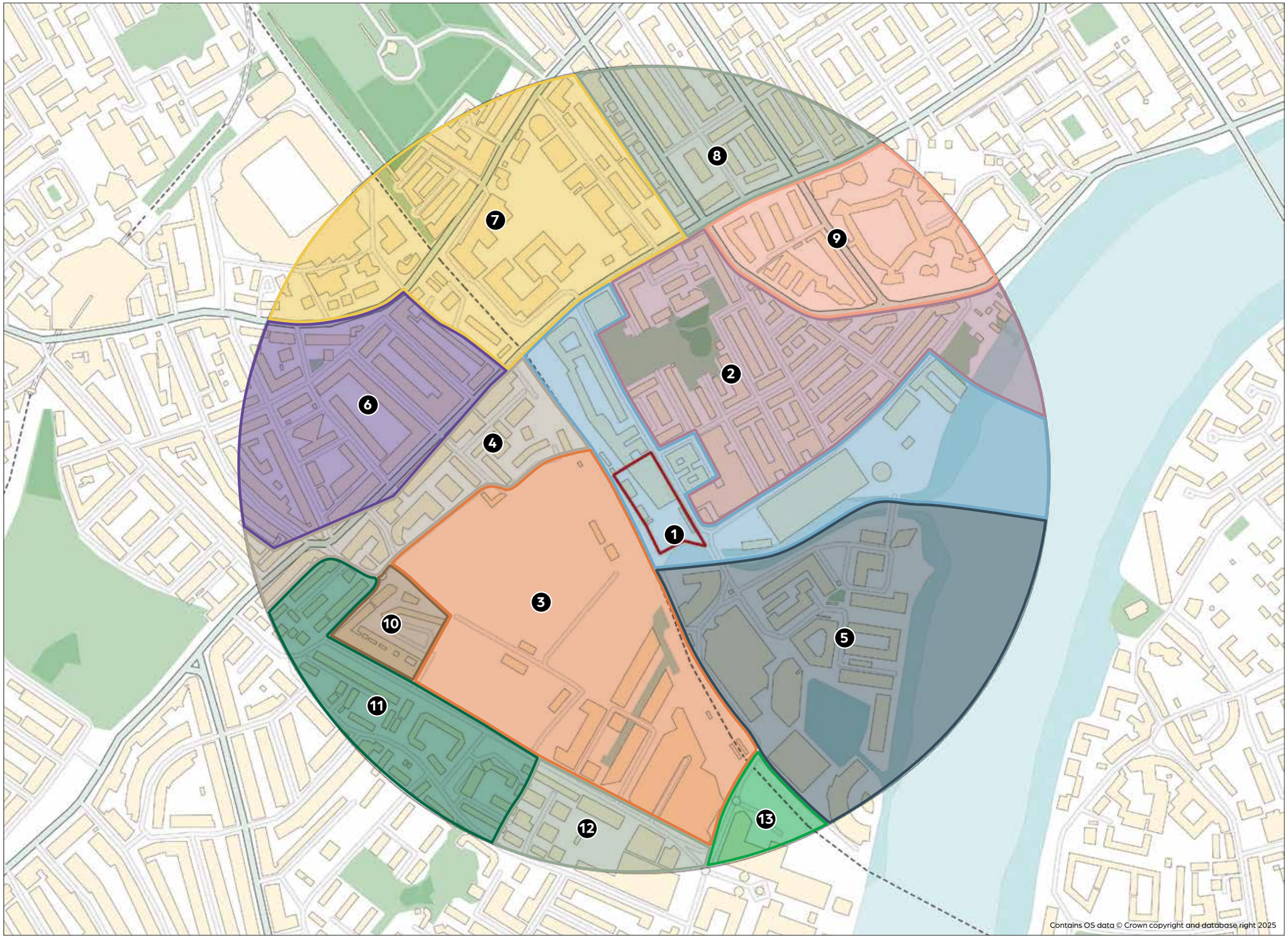
6.4 The ZTV is overlaid on the Townscape Character Area plan at **Figure 6.2**. The ZTV demonstrates that interposing development means that there would be limited to no visibility from the areas to the north of King's Road. In these areas, there would also be no change to the use or function of the TCAs because of the separating distances. The Proposed Development would not introduce a meaningful change to the townscape areas to the north of the Site, and they are therefore scoped out from requiring assessment: TCAs 4, 6, 7 and 8.

6.5 Similarly, the ZTV and separating distances mean that the Proposed Development would not introduce a meaningful change to the townscape areas to the west and east edges of the study area, and they are also scoped out: TCAs 9–13. It is noted that any effect of the Proposed Development on the character areas to the west, TCAs 10–13, would be significantly reduced or removed altogether when the Kings Road Park scheme is completed, which would introduce taller buildings to the wider area experienced from within these TCAs.

6.6 The ZTV indicates that there would be some visibility from Brompton Cemetery to the north of the Site and from the riverside areas to the east. The effect on Brompton Cemetery will be considered within the heritage assessment, as Brompton Cemetery is an RPG and conservation area, and the river views are assessed as part of the visual assessment.

6.7 In the river views, the Proposed Development would appear as part of the area of modern taller and mid-rise residential developments that define this part of the west riverside, and as such, the townscape character and appearance from the east bank of the River Thames would not change and does not require townscape assessment.

6.8 The ZTV indicates that visibility across the residential development at Chelsea Waterfront (TCA5) would be limited, however it is included for assessment given the proximity to the Site.



TOWNSCAPE CHARACTER AREAS

- Application Site
- 1 Lots Road commercial/ retail
- 2 Lots Village Residential
- 3 Former Gas Cylinders Regeneration Area
- 4 Kings Road– Primary Retail Frontage
- 5 Waterfront Residential
- 6 Moore Park residential terrace
- 7 College of St Marks
- 8 Sloane Stanley Residential
- 9 Flatted Residential
- 10 Former Gas Works Cottages
- 11 Fulham late 19th century
- 12 Bagleys Lane Former Industrial
- 13 Sands End Industrial

LOCATION:
71 Lots Road, SW10 0RN

DATE:
July 2025

SCALE:
1:5,000 @ A3

FIGURE 6.1 Townscape Character Area Plan

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
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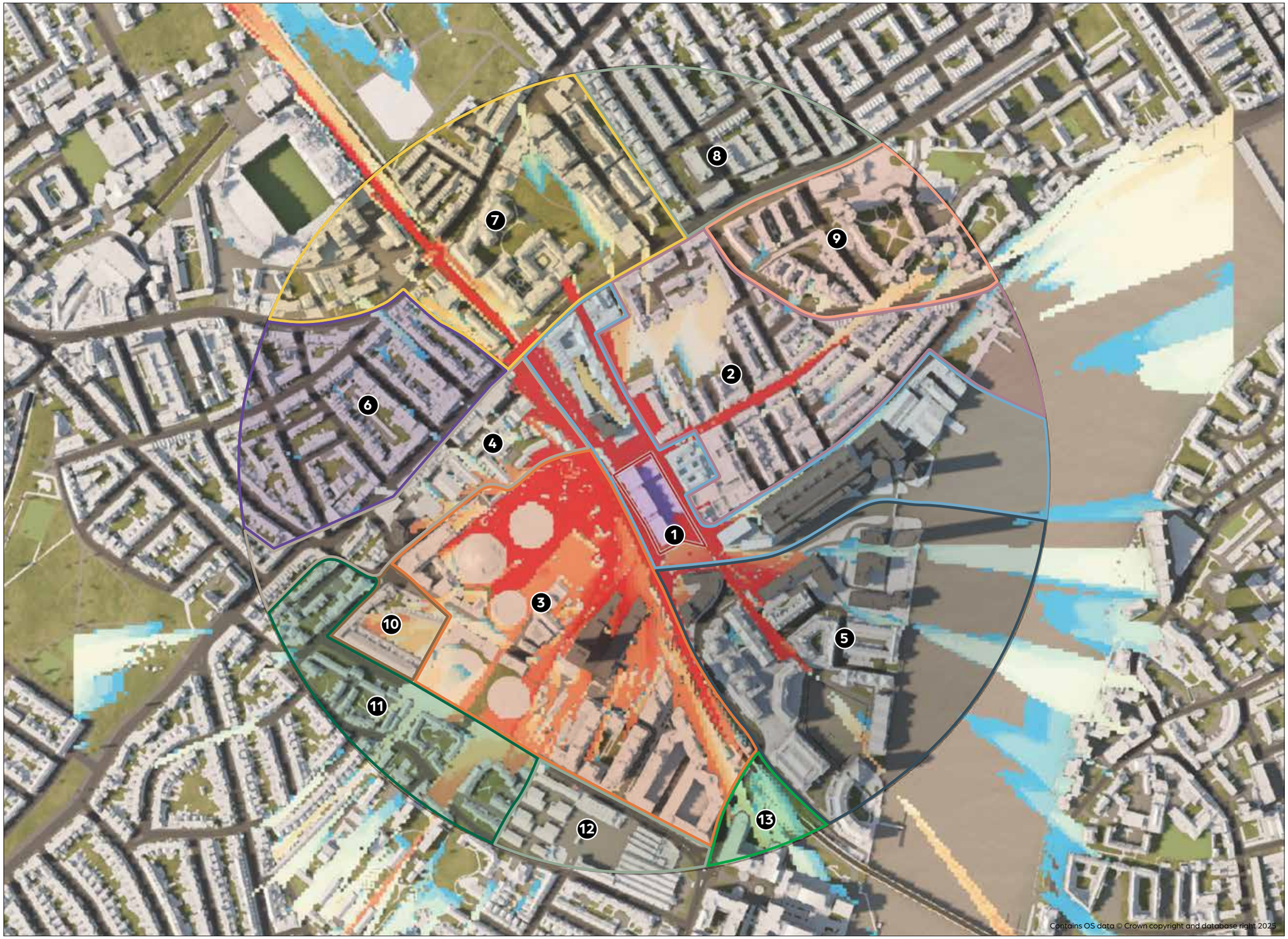

TOWNSCAPE CHARACTER AREAS OVERLAID WITH ZTV (WITHOUT CONSENTED SCHEMES)

- Application Site
- 1 Lots Road commercial/ retail
- 2 Lots Village Residential
- 3 Former Gas Cylinders Regeneration Area
- 4 Kings Road– Primary Retail Frontage
- 5 Waterfront Residential
- 6 Moore Park residential terrace
- 7 College of St Marks
- 8 Sloane Stanley Residential
- 9 Flatted Residential
- 10 Former Gas Works Cottages
- 11 Fulham late 19th century
- 12 Bagleys Lane Former Industrial
- 13 Sands End Industrial

LOCATION:
71 Lots Road, SW10 0RN

DATE:
July 2025

SCALE:
1:5,000 @ A3

FIGURE 6.2 Overlay of the ZTV with the Townscape Character Area Plan

▲ **NORTH**

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TOWNSCAPE CHARACTER AREAS

6.9 The character of the three TCAs that are scoped in for assessment is described below: TCAs 1, 2, 4 and 5. An aerial image of the area is provided at **Figure 6.3**.

TCA1 LOTS ROAD COMMERCIAL/RETAIL

6.10 The Site is located in TCA1. It comprises a narrow area of land that extends south of King's Road towards the River Thames and follows Lots Road as it bends to the north-east.

6.11 The townscape comprises mixed commercial and industrial buildings. The buildings to the north of the TCA predominantly date to the 20th century and there are also some residential uses in mid-rise buildings. The townscape becomes more fragmented towards the south and includes the Site, which has some earlier industrial buildings and a lower scale of development. As the road turns to the north-east, the varied industrial character continues with 19th century buildings, including the former Lots Road Power Station which has a grand scale and some architectural merit. The Power Station is being redeveloped and there are new residential developments in this location.

6.12 There is a diverse mix of retail and commercial uses a long the frontage. The nature of the uses, auctions houses, furniture stores, creates a busy throughfare of vehicle and pedestrian traffic, animating the street at ground level. Some street trees are present at the southern 'elbow' of Lots Road. Overall, however, the area contains limited areas of soft landscaping.

6.13 Associated viewpoints: **1-7**

6.14 Townscape value: **Low/Medium**

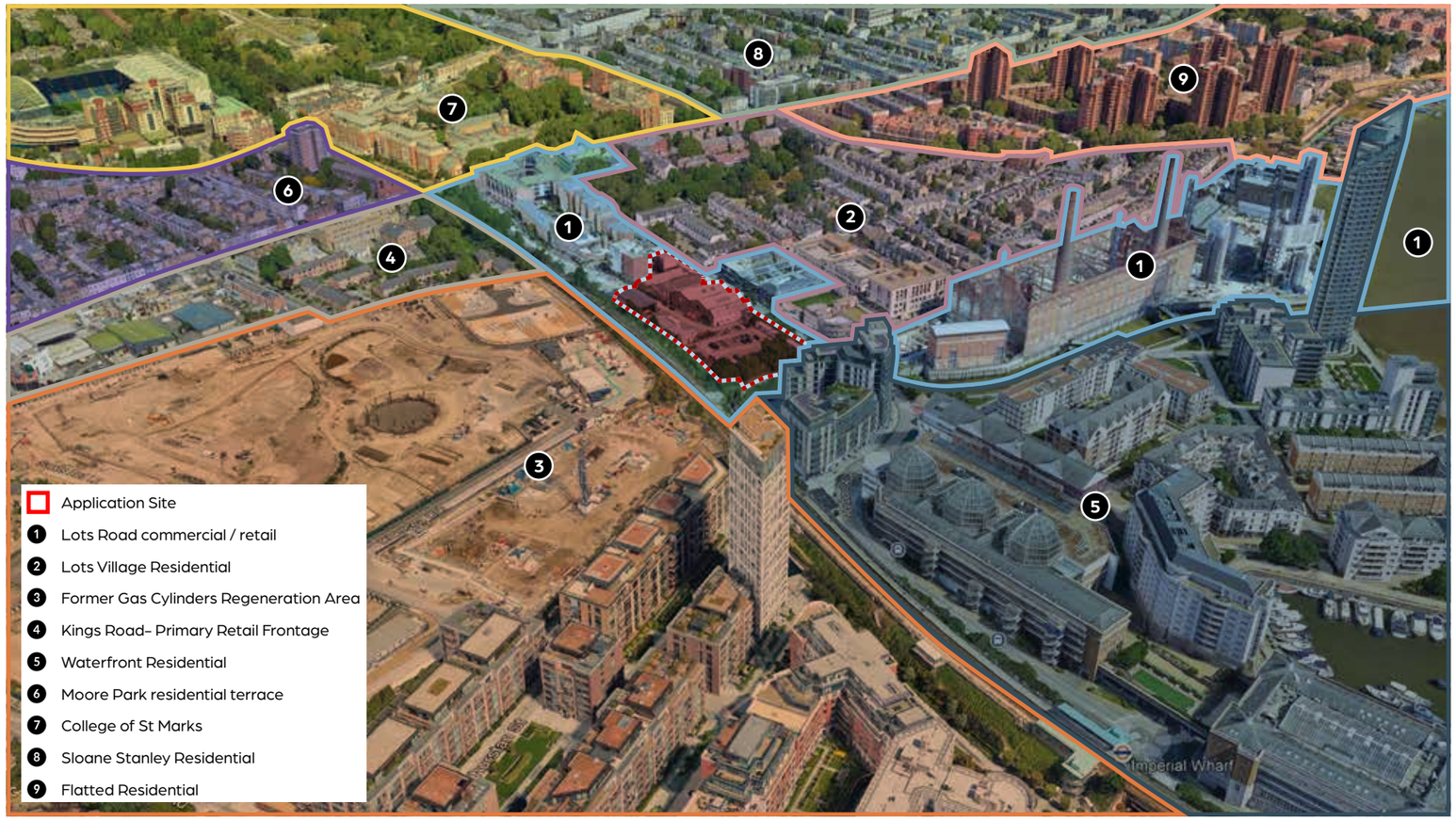


Figure 6.3 Aerial Image of TCAs 1, 2 and 5. The Site is Indicated in Red

TCA2 LOTS VILLAGE RESIDENTIAL

6.15 TCA2 largely reflects the Lots Village Conservation Area boundary (see **Section 5.0**). The area comprises a well-preserved Victorian terraced housing area from the late-19th century, and many of the buildings retain original architectural details, notably stucco mouldings and cast-iron railings. This presents itself cohesively architecturally and historically as a distinct area separate from surrounding emerging developments.

6.16 The predominant use is residential, though some educational facilities and commercial/retail uses exist towards the peripheries. Overall, the area is tranquil and calm away from the busy Kings Road to the northern boundary. Activity is largely associated with residential use, with Lots Road (located within TCA2) experiencing greater vehicle traffic by virtue of the commercial uses present along its frontages.

6.17 Westfield Park to the north-east of the TCA provides public green space and street trees provide a sense of tranquillity away from the more densely.

6.18 Associated viewpoints: **3–6, 8–11, 20**

6.19 Townscape value: **High**

TCA3 FORMER GASWORKS

6.20 TCA3 comprises the former gasworks to the west of the Site that extends from the railway line on the Site's west boundary to Imperial Road. Historically, the character of this TCA would have been industrial, defined by the gasworks and its associated buildings and structures. The former gasworks site is currently being redeveloped as part of the Kings Road Park masterplan, and it is in a state of transition.

6.21 To the south of the TCA, near to Imperial Wharf station, there is modern residential development in mid-rise linear buildings on a regular street pattern. There is pleasant and attractively landscaped public realm, including the boundary to the railway line which incorporates water and planting. There is a tall building within this part of the TCA, at the east boundary. The modern residential development utilises brick and metal cladding in its materials.

6.22 The remainder of the TCA is a development site and, as such, closed off to the public and there is no permeability, access or completed buildings. The CGI at **Figure 6.4** shows how the Kings Road Park will look once completed. It will transform the site into a residential quarter including a collection of tall buildings and mid-rise buildings. The historic gasworks infrastructure, features of which are listed, will be refurbished and reinstalled as part of the development to maintain the area's history and contribute to the public realm and open space within the site.

6.23 Associated viewpoints: **15, 16**

6.24 Townscape value: **Low/Medium**

Figure 6.4 CGI of the Kings Road Park Masterplan. Source: Studio Egret West[3]

3 https://studioegretwest.com/places/kings-road-park

TCA5 CHELSEA WATERFRONT RESIDENTIAL

6.25 TCA5 lies to the south-east of the Site, and it is considered in this assessment due to its proximity to the Proposed Development. The character of Chelsea Creek is defined by modern residential development, including Chelsea Creek, Chelsea Harbour and Imperial Wharf. The architecture in the area is contemporary in nature and largely comprises residential mixed-use buildings, as well as the Chelsea Harbour Hotel, The Roca London Gallery and Chelsea Harbour Design Centre, ranging between nine and 12 storeys.

6.26 Green open space is limited within this area. However, the River Thames, designated nature conservation area of metropolitan importance provides public amenity enhanced by the riverside walk below the railway that offers pedestrian access.

6.27 Associated viewpoints: **N/A**

6.28 Townscape value: **Low/Medium**

TOWNSCAPE SUMMARY

6.29 The townscape baseline is summarised in **Table 6.1**.

REF.	TOWNSCAPE CHARACTER AREA	TOWNSCAPE VALUE	FULL ASSESSMENT REQUIRED?
1	Lots Road Commercial/Retail	Low/Medium	Yes
2	Lots Village Residential	High	Yes
3	Former Gasworks	Low/Medium	Yes
4	Kings Road – Primary Retail Frontage	–	Not required due to separating distance and interposing development, and the ZTV indicates limited to no visibility from the Kings Road.
5	Chelsea Waterfront Residential	Low/Medium	Yes
6	Moore Park Residential Terrace	–	Not required due to separating distance and interposing development which limits visibility of the Proposed Development from the TCA, and there would be no change to TCA character or function introduced by the Proposed Development.
7	College of St Marks	–	
8	Sloane Stanley Residential	–	
9	Flatted Residential	–	
10	Former Gas Works Cottages	–	
11	Fulham Late 19th century	–	
12	Bagley's Lane Former Industrial	–	
13	Sands End Industrial	–	

Table 6.1 Summary of the Townscape Character Areas

7.0
BASELINE: VISUAL
LOTS ROAD SOUTH

BASELINE: VISUAL

7.1 This section identifies the visual baseline and the visual receptors that will be subject to assessment.

VISUAL BASELINE

7.2 The visual baseline has been established using a ZTV which is reproduced at **Figure 7.1**. The ZTV demonstrates that the visual envelope of the Proposed Development is relatively limited due to separating distances and interposing development.

7.3 The ZTV and site observations were used to identify a series of viewpoints to represent how the Proposed Development would appear in the local area. The representative viewpoints inform the visual impact assessment, and verified views of the Proposed Development have been produced by Miller Hare.

7.4 The viewpoint locations are shown on the map at **Figure 7.2**. The viewpoints locations and the format of the verified views (i.e. lens type and render or wireline) have been agreed with the LBHF and RBKC through pre-application discussions.

7.5 The representative views are used to represent and inform the visual impact assessment. They have been grouped into geographical areas and a description of the value of the visual amenity in the views and the receptors who experience the views is provided in this section.

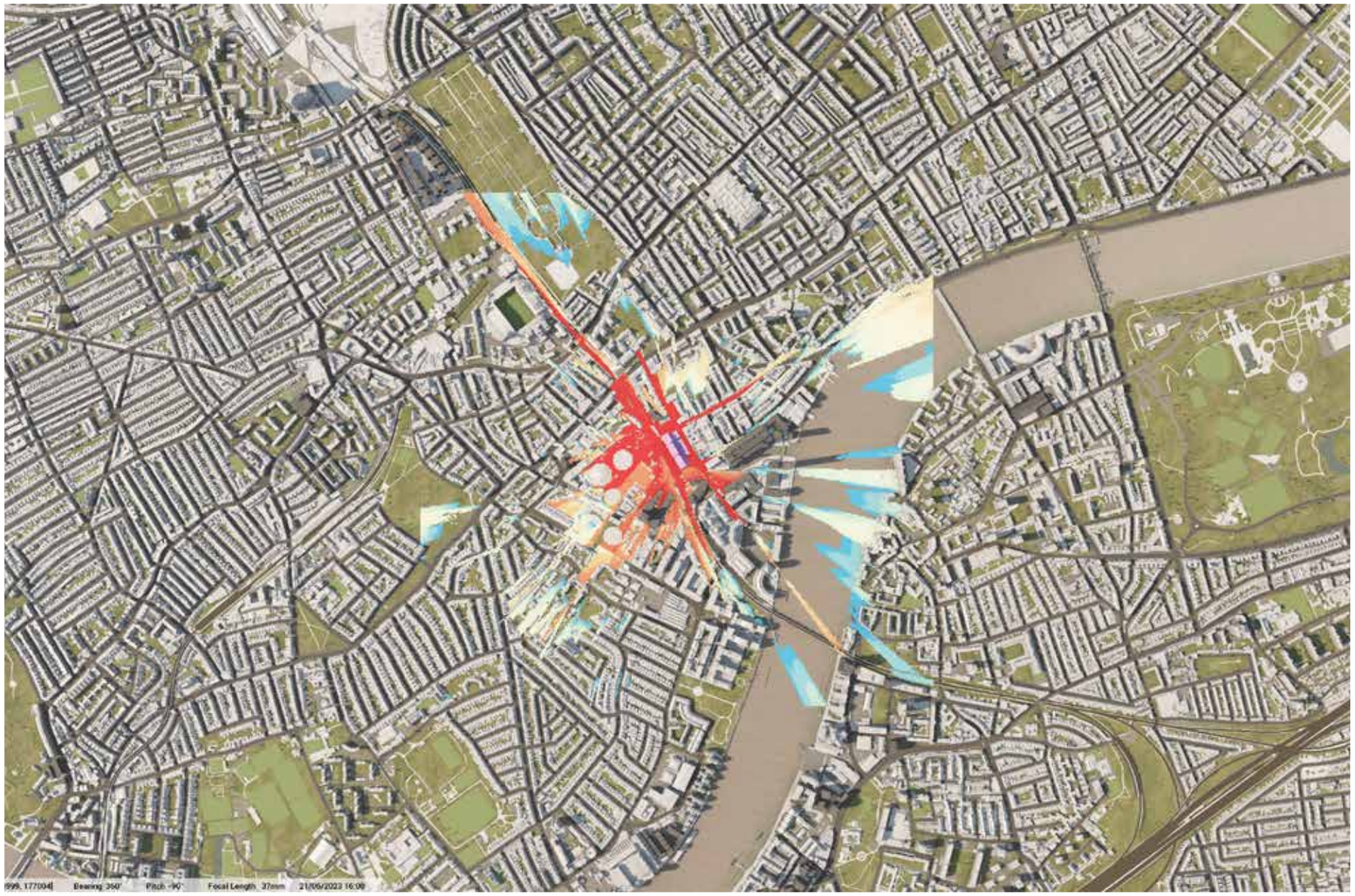
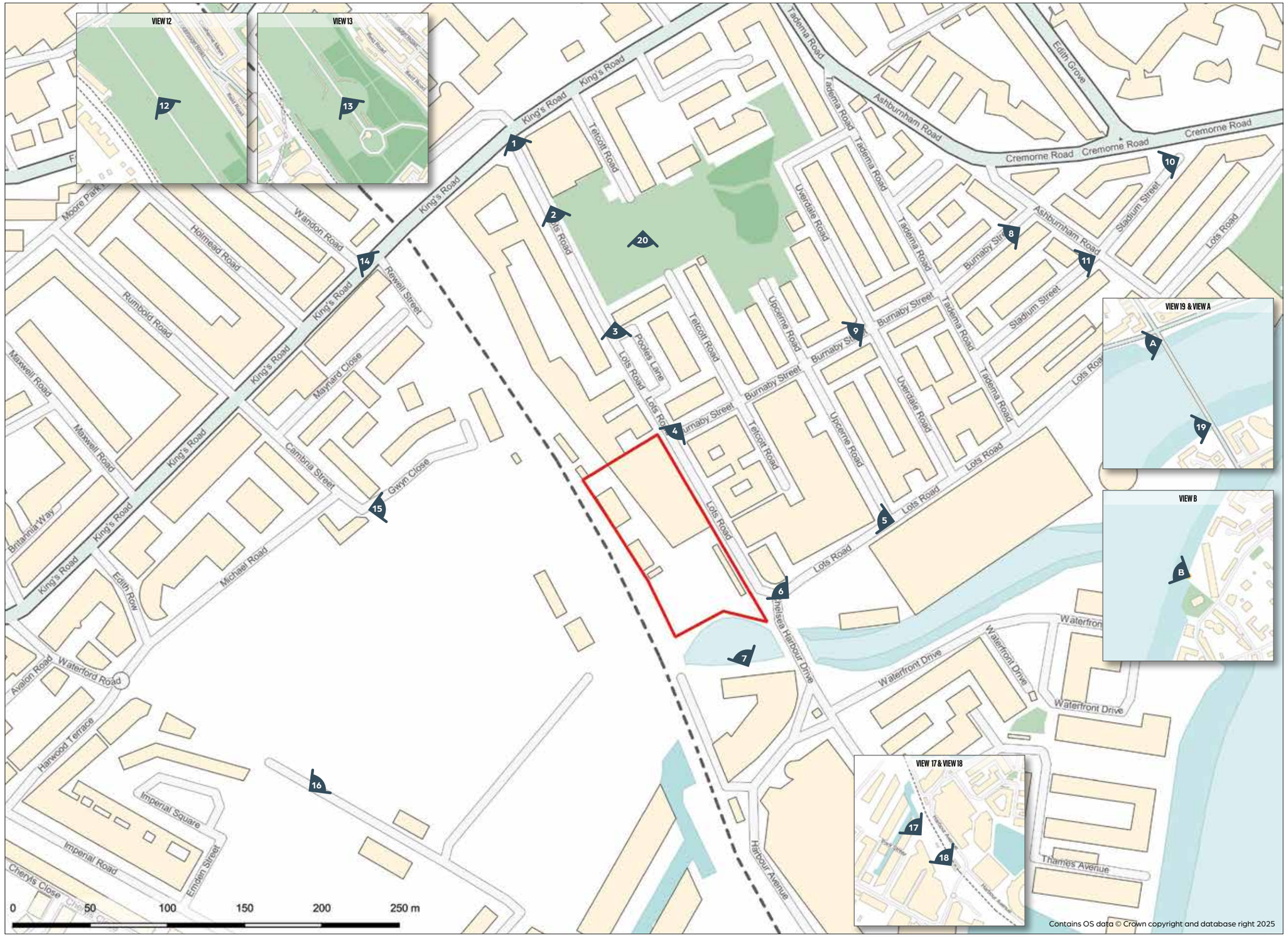


Figure 7.1 ZTV of the Proposed Development Produced with VUCITY



VIEW LOCATION PLAN

Application Site

1. Lots Road north (RBKC)
2. Lots Road adjacent to Westfield Park (RBKC)
3. Lots Road at junction with Pooles Lane (RBKC)
4. Burnaby Street west at junction with Lots Road (RBKC)
5. Lots Road at junction with Upcerne Road (RBKC)
6. Lots Road at Chelsea Harbour Drive (RBKC)
7. Harbour Yard at creek edge (RBKC)
8. Burnaby Street near Ashburnham Road (RBKC)
9. Burnaby Street at junction with Upcerne Road (RBKC)
10. Stadium Street (RBKC)
11. Ashburnham Road at junction with Stadium Street (RBKC)
12. Brompton Cemetery northern pathway (RBKC)
13. Brompton Cemetery – within arcades (RBKC)
14. King's Road at Rewell Street
15. Gwyn Close (LBHF)
16. King's Road Park (LBHF)
17. Open space near Station Court (LBHF)
18. Imperial Wharf Platform (LBHF)
19. Battersea Bridge Road (London Borough of Wandsworth)
20. Westfield Park (RBKC)

Additional locations tested on basis of ZTV

A. St Mary's Battersea (London Borough of Wandsworth)
B. Battersea Bridge 2 (London Borough of Wandsworth)

LOCATION:
71 Lots Road, SW10 0RN

DATE:
July 2025

SCALE:
1:2,500 @ A3

FIGURE 7.2 View Location Plan

▲ **NORTH**

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REPRESENTATIVE VIEWS

LOTS ROAD

7.6 The kinetic views along Lots Road are represented by verified view nos. 1–6. The visual receptors **are residents, pedestrians, workers and road users**.

7.7 The views along Lots Road comprise varied development ranging from low-rise to mid-scale. The architecture is mainly from the late-19th and 20th century and the prevailing material is masonry. There is otherwise no cohesive visual character along Lots Road. The route is visually well-contained, and development comes up to the pavement line. The views along the road do become more open near to Westfield Park and the residential developments that are set back from the street edge.

7.8 The park and street trees along Lots Road provide greenery and screening to the upper parts of the buildings. This creates a sense of enclosure which is increased in the summer months when the trees are in full leaf.

7.9 There are some active frontages from commercial uses at ground floor which adds activity and interest to the streetscene. Cars may be parked on the street which adds some visual interference. The route is not, however, heavily trafficked.

7.10 On the southern part of Lots Road represented by views 5 and 6, the views contain more of the historic character of the area, where the former Lots Road Power Station has a strong visual presence and there is recent development that reflects the materiality and scale of the power station. The dark brick-faced building to the west of the power station in particular is eye-catching because of the unusual materiality.

7.11 There is the most visual interest in the southern part of the Lots Road sequence, created also by the Lots Road public house which turns the corner in a curve and presents an attractive, traditional frontage which is inviting. In this part of the kinetic views, one is also aware of the creek, and the landscape feature adds visual interest and a surprising feature in an otherwise urban area.

7.12 Representative views: **1–6**

7.13 Visual amenity value: **Low/Medium**

Figure 7.3 View 1 Lots Road north – Existing

Figure 7.4 View 2 Lots Road adjacent to Westfield Park – Existing

Figure 7.5 View 3 Lots Road at junction with Pooles Lane – Existing

Figure 7.6 View 4 Burnaby Street west at junction with Lots Road – Existing

Figure 7.7 View 5 Lots Road at junction with Upcerne Road – Existing

Figure 7.8 View 6 Lots Road at Chelsea Harbour Drive – Existing

CHELSEA CREEK

7.14 The view across Chelsea Creek from the public realm associated with the Chelsea Island development is represented by view 7. The visual receptors are **residents and pedestrians**.

7.15 From this location, the receptors would be aware of the modern development and the historic area of Lots Village to the north-west which includes the Lots Road public house (see above) and the Lots Road Power Station. The creek, which has some visual interest as a landscape feature/open body of water, is appreciated in this historic context and is somewhere that receptors may pause to enjoy their surroundings.

7.16 That said, the creek appears poorly maintained with scrub vegetation on the north side in the views forming the retaining edge. The Site is readily apparent in the view. It is fenced in, so the ground plain is not visible, and the upper parts of the existing light industrial buildings appear on the horizon. The Site does not make any particular contribution to the visual amenity of the area, and it is not attractive or oriented to address the creek.

7.17 Representative views: **7**

7.18 Visual amenity value: **Low**

Figure 7.9 View 7 Harbour Yard at creek edge – Existing

LOTS VILLAGE

7.19 A number of views have been prepared to represent the visual amenity of Lots Village to the east of the Site. The visibility of the Proposed Development would be provided by the east-west oriented streets. The Proposed Development would not appear in the north-south orientated streets or in the views looking east. The visual receptors would be **residents and pedestrians**.

7.20 Lots Village has a traditional, 19th century character with homogenous residential terraces defining the grid street pattern. There is some variation introduced by infill developments or later buildings, and the scale and grain changes as you move further to the west towards Lots Road. There are street trees that reinforce the residential character and would provide a sense of enclosure in the summer months.

7.21 The materiality is brick with render dressing and grey roofs. There are some fully rendered elevations, mansards and tall stacks which introduce some variety to the domestic architecture. Overall, there is an architectural cohesion in appearance and scale.

7.22 There are crossroads in Lots Village which are moments of particular visual amenity because they require an opportunity to pause and provide an appreciation in different directions through the area.

7.23 Representative views: **(4–6), 8–11**

7.24 Visual amenity value: **Medium**

Figure 7.10 View 8 Burnaby Street near Ashburnham Road – Existing

Figure 7.12 View 10 Stadium Street – Existing

Figure 7.11 View 9 Burnaby Street at junction with Upcerne Road – Existing

Figure 7.13 View 11 Ashburnham Road at junction with Stadium Street – Existing

BROMPTON CEMETERY

7.25 Views 12 and 13 from Brompton Cemetery are primarily identified to help understand the potential visual impact of the Proposed Development on the special interest of the designated heritage assets comprising the cemetery. In visual amenity terms, the receptors would be **pedestrians, cyclists and visitors**. It is noted that the cemetery is only open to the public from dawn until dusk.

7.26 The views looking south in the cemetery are provided by the central ceremonial axis that is planned from the North Lodge to the Anglican Chapel. The Chapel is the centrepiece and focal point of the views, which are kinetic and travel through an avenue of trees before opening up into the arcades and hemicycle.

7.27 The avenue of trees provides a strong visual containment in the northern part of the kinetic sequence. In the central and southern part of the views, the Chapel remains the focal building and it domed roof is an important feature on the horizon. It breaks above the tree line that otherwise contains the cemetery edges and reinforces the landscape character of the burial ground.

7.28 The foreground of the views is defined by the historic planned burial landscape with many monuments, graves and other features providing visual interest and retaining attention downward.

7.29 The views looking south within the cemetery also include modern taller developments in the distance, as well as the football stadium immediately to the south-west of the cemetery. The visual amenity of the cemetery is, therefore, influenced by modern development and its location in central London.

7.30 Representative views: **12, 13**

7.31 Visual amenity value: **High**

Figure 7.14 View 12 Brompton Cemetery northern pathway – Existing

Figure 7.15 View 13 Brompton Cemetery within arcades – Existing

KING'S ROAD

7.32 View 14 has been identified to represent the visibility of the Proposed Development indicated by the ZTV from the King's Road. The potential visibility is created by the railway corridor which provides an opportunity for long views towards the Site. The visual receptors would be **pedestrians and residents**. We do not identify road users because the views of the Site would require turning of the head and would be fleeting if travelling at speed in a vehicle or bicycle, and therefore not relevant to these types of receptors.

7.33 The views towards the Site provided by the railway corridor are from Rewell Street. The photography demonstrates that the long views are screened by fencing and planting at the railway line and there are only filtered views towards buildings beyond. The chimneys of the former Lots Road Power Station are recognisable and the angled top of Tower West at Chelsea Waterfront. Otherwise, there are no features of note and the surrounding context is of low-rise residential properties.

7.34 Representative views: **14**

7.35 Visual amenity value: **Very Low**

Figure 7.16 View 14 King's Road at Redwell Street – Existing

KINGS ROAD PARK

7.36 Kings Road Park is the site of the former gasworks to the west of the Site which is subject to redevelopment and presently a construction site. Three verified views have been produced to represent the visual amenity of this area, where publicly accessible. The visual receptors are **residents and pedestrians**.

7.37 The views through the area are determined by the layout of the Kings Road Park masterplan and they are mainly defined by the development that is coming forward. This comprises mid-rise and tall residential buildings set within public realm which has hardstanding and soft landscaping features, including water and landscape. The water features in particular introduce a sense of tranquillity and interest to the views of the area.

7.38 The Site is not visible in its current form from Kings Road Park, where the buildings on the Site are lower than the hoarding/fencing that enclose the development site or do not appear above shrubs/trees. The views looking west include the chimneys of the former Lots Road Power Station and other mid-rise and tall buildings in the RBKC beyond Kings Road Park.

7.39 Once complete, the visual amenity of the Kings Road Park area is likely to be Medium or High given the quality of the architecture and integration of historic structures. The current condition, however, of a construction site, contributes less to the visual amenity of the area, despite the areas where residential development has been completed and there is attractive public realm.

7.40 Representative views: **15–17**

7.41 Visual amenity value: **Low**

Figure 7.17 View 15 Gwyn Close – Existing

Figure 7.19 View 17 – Open space near Station Court – Existing

Figure 7.18 View 16 King's Road Park – Existing

IMPERIAL WHARF

7.42 View 18 has been identified to represent the effect of the Proposed Development on views from Imperial Wharf station. The visual receptors would be **pedestrians**. The views from the station are defined by the railway tracks which extend north and south. The railway is contained by modern residential development of varied scale and architecture. The development is mid-rise and there is an awareness of tall buildings in the area. The station platform is at a raised level so there is no awareness of street-level activity. The modern development has some visual interest, and the long views provided to the north and south are engaging. To the south in particular, receptors would be aware of the openness provided by the river.

7.43 Representative views: **18**

7.44 Visual amenity value: **Low/Medium**

BATTERSEA BRIDGE AND WANDSWORTH

7.45 The ZTV indicates visibility from river crossings and the south bank of the River Thames. The visual receptors would be **pedestrians, residents and road users**.

7.46 The river is the focal point and main feature of the views and the appreciation of the development at the riversides. The development on the north side of the river, including the Site, is more varied in scale and character than the south, which is lower-rise and more traditional. The tall buildings on the north side of the river in the views have articulated roofs and create an interesting skyline and silhouettes. There is a mix of masonry and curtain-wall glazing.

7.47 The appreciation of the river includes boats and movement on the river itself which is the focus of attention. The receptors would also be aware of their wider surroundings, including movement on Battersea Bridge, for example, and views of central London to the east.

7.48 Representative views: **19, A, B**

7.49 Visual amenity value: **High**

Figure 7.22 View B Battersea Bridge 2 – Existing

Figure 7.20 View 18 Imperial Wharf Platform – Existing

Figure 7.21 View 19 Battersea Bridge Road – Existing

Figure 7.23 View A St Mary's Battersea (London Borough of Wandsworth) – Existing

WESTFIELD PARK

7.50 View 20 represents the visual amenity of people using Westfield Park. The receptors would be **residents and pedestrians**. The park has open grass which is punctuated by trees. The trees provide screening to the development containing the part, which is low-rise residential properties. The visual receptors would be aware of passing through a residential area and mainly focussed on their activities rather than the surrounding environment.

7.51 Representative views: **20**

7.52 Visual amenity value: **Low/Medium**

Figure 7.24 View 20 Westfield Park – Existing

SUMMARY

7.53 The visual baseline is summarised at **Table 7.1**.

VIEW NOS.	LOCATION	VISUAL RECEPTORS	VISUAL AMENITY VALUE
1–6	Lots Road	Residents Pedestrians Workers Road Users	Low/Medium
7	Chelsea Creek	Residents Pedestrians	Low/Medium
(4–6) 8–11	Lots Village	Residents Pedestrians	Medium
12, 13	Brompton Cemetery	Pedestrians Cyclists Visitors	High
14	King's Road	Pedestrians Residents	Very Low
15–17	Kings Road Park	Pedestrians Residents	Low
18	Imperial Wharf	Pedestrians	Low/Medium
19, A, B	Battersea Bridge and Wandsworth	Pedestrians Residents Road Users	High
20	Westfield Park	Residents Pedestrians	Low/Medium

Table 7.1 Visual Baseline Summary

8.0
ASSESSMENT: HERITAGE
LOTS ROAD SOUTH

ASSESSMENT: HERITAGE

8.1 This section assesses the effect of the Proposed Development on the significance of the heritage assets identified at **Section 5.0**.

HERITAGE ASSETS ON THE SITE

SANDS END CONSERVATION AREA

8.2 A small part of the Site falls within the Sands End Conservation Area (LBHF). This is approximately 408m² in the south-west corner of the Site comprising land at the edge of Chelsea Creek. The Proposed Development would involve direct, physical works to land within the conservation area, and there would be a setting effect from the new development on the remainder of the Site extending to the north.

DIRECT EFFECTS

8.3 There is no built form proposed on the part of the Site comprising the conservation area, and that part of the Site would be retained and re-landscaped as part of the public realm at the creek edge. This area is referred to as the Creekside Promenade in the Proposed Development, and an image from the DAS is reproduced at **Figure 8.1** to show how the area would be pedestrianised and landscaped.

8.4 The existing creek wall would be replaced and rebuilt, and planting would be introduced at the creek edge. It is understood that the landowner will maintain the improvements to the new intertidal habitats that will be created on the south side of the creek wall.

8.5 The existing creek wall/creek edge is a combination of concrete, steel sheet piling and brickwork. A short section on the north side, within the Site, is an unconsolidated bank of made ground, rubble and alluvium which is understood to have been constructed in the mid-20th century when the former northern alignment of the creek was roughly backfilled into made ground.

Figure 8.1 Computer Generated Image ('CGI') of the Creekside Promenade. Source: DAS

8.6 The existing creek wall is therefore modern fabric/feature of no special heritage interest, and the interest of this part of the conservation area is primarily derived from the appreciation of the open body of water.

8.7 The rebuilt creek wall would be sympathetic in design and materials to the historic industrial character of the creek.

8.8 A green edge to the creek would be maintained by the tree planting which would create a natural and pleasant environment within the conservation area that is accessible to the public. This would complement the similar area of public realm on the opposite (south) side of the creek that has been delivered as part of the Chelsea Island Development.

SETTING EFFECTS

8.9 The Proposed Development would introduce new, tall residential building to the immediate setting of the conservation area where it extends along Chelsea Creek. The surrounding built-up area is not covered by the conservation area designation, and the existing Site makes a neutral contribution to the significance of the conservation area, and it does not offer public access and the creek edge is subject to only basic maintenance. This is in contrast to the south side of the creek, which is publicly accessible and provides views across the creek.

8.10 The creek in this part of the conservation area is experienced and understood in the context of residential and industrial development at the creek edge and enclosing it. The change from open to developed land on the Site is not, therefore, harmful to the character or appearance of the conservation area.

8.11 The south elevations of Blocks A and E would address the creek (**Figure 8.2**). They would be set back from the creek edge but an area of landscaped, public open space, and the proposed materiality and planting has had regard to the creek and the historic industrial character. The space between the creek edge and the buildings, as well as the landscape features proposed in this area, would soften the effect of the massing on the creek and would ensure that the creek was appreciated as a part of the public realm.

Figure 8.2 Verified View of the Proposed Development Looking North from the Chelsea Island Development

OVERALL ASSESSMENT

8.12 The Proposed Development would preserve and enhance the small part of the Sands End Conservation Area that includes and lies near to the Site. The enhancement would be derived from providing public access on the north side of the creek with the new public realm, rebuilding the creek wall in a sympathetic style and introducing a high-quality planting strategy that would be subject to ongoing maintenance.

8.13 The Proposed Development would complement the appreciation and amenity value of the conservation area, which is already experienced as part of the public realm on the south side of the creek associated with the Chelsea Island development.

8.14 The introduction of new buildings, including a tall building, at the creek edge would not cause harm to its significance or an appreciation thereof, because the heritage interest of the creek is derived from the appreciation of the open body of water as a feature of the area's history, and the creek is already experienced as contained by historic and modern development.

NOS. 65-69 LOTS ROAD

8.15 The brick warehouse buildings with the triple gable at Nos. 65-69 Lots Road are identified as non-designated heritage assets. The Proposed Development would demolish the buildings to realise the scheme. The DAS explains the options that were tested for retention or part-retention of the buildings, and explains why this would not be viable and would lead to much greater heights to be introduced to the Site in order to deliver the brief and the objectives of the SPD.

8.16 The buildings, while dating from the turn of the 20th century, are typical of their age and type and have been extensively altered internally. In our judgement they have very low significance. Their loss has been accepted in principle by all stakeholders and should be weighed as part of the overall planning balance in accordance with paragraph 216 of the NPPF which states that:

> *The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

HERITAGE SETTING CONSIDERATIONS

LOTS VILLAGE CONSERVATION AREA

8.17 The Proposed Development would introduce a new residential development at the west boundary of the Lots Village Conservation Area. The Proposed Development would change the setting of the conservation area in the following ways:

8.17.1 The new five storey buildings on Lots Road that would be seen together with the conservation area where the boundary includes development on Lots Road; and

8.17.2 The appearance of the taller Blocks, A-C, in views from within the conservation area.

8.18 This assessment will consider whether and to what extent the ability to appreciate the significance of the conservation area would be affected by these setting changes. It will be informed by the verified views of the Proposed Development that have been produced by Miller Hare.

GENERAL CHARACTER

8.19 The conservation area is defined by commercial uses on Lots Road, Victorian residential development to the interior (which makes up the largest part of the conservation area), and industrial and taller development to the south and south-west. The Conservation Area Appraisal recognises that the conservation area is inward-focussed and does not draw any significance from its setting. The sense of containment and the conservation area being 'set apart' from its surroundings is reinforced by the scale of modern and other later development in the setting. The Conservation Area Appraisal also acknowledges that taller developments are visible outside of the conservation area in views from within it.

DEMOLITION AND CHANGE ON THE SITE

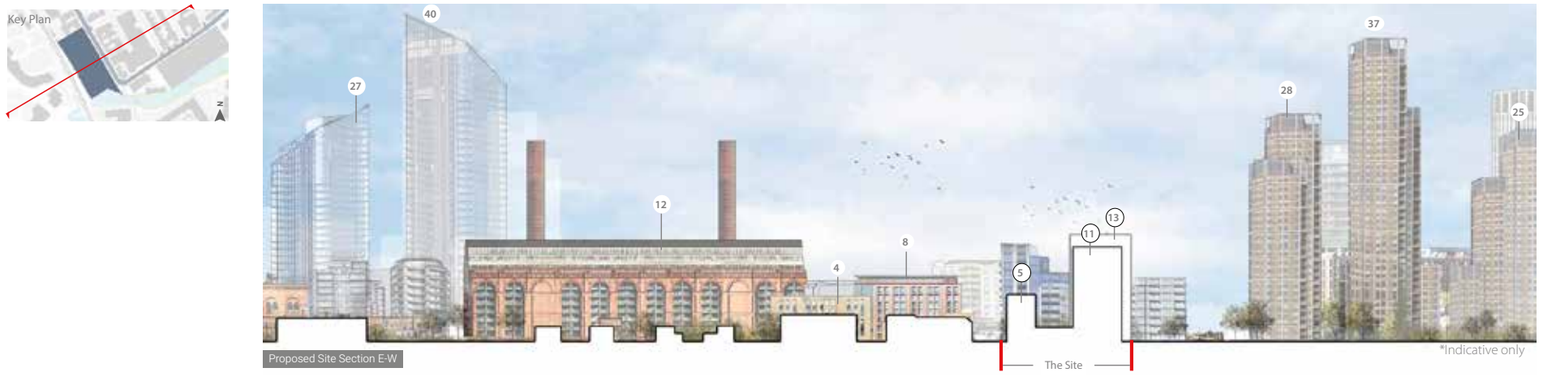
8.20 The conservation area does not draw any significance from the Site or its existing buildings, and the demolition and redevelopment of the Site would not be harmful to the special interest the conservation area. It is noted that the demolition of the existing buildings has been accepted in principle through pre-application discussions and it is necessary to optimise the redevelopment of the Site in a manner that is sensitive to its context (see retention option studies in the DAS).

LOTS ROAD AND BLOCKS D AND E

8.21 The Proposed Development will be experienced kinetically on Lots Road, where five storey buildings would be introduced on the street frontage (Blocks D and E). Blocks D and E have been designed at five storeys to relate to the lower scale of the conservation area and follow the design principles in the Lots Road South SPD to step down to the east.

8.22 The context elevation which is reproduced from the DAS at **Figure 8.3** demonstrates that a height of five storeys is consistent with the prevailing heights for buildings on the north side of Lots Road.

8.23 The five storey buildings will present an attractive frontage with variation in the building line and colour palette which will deliver a higher quality and more active west side of Lots Road to contribute to the vitality of the conservation area.



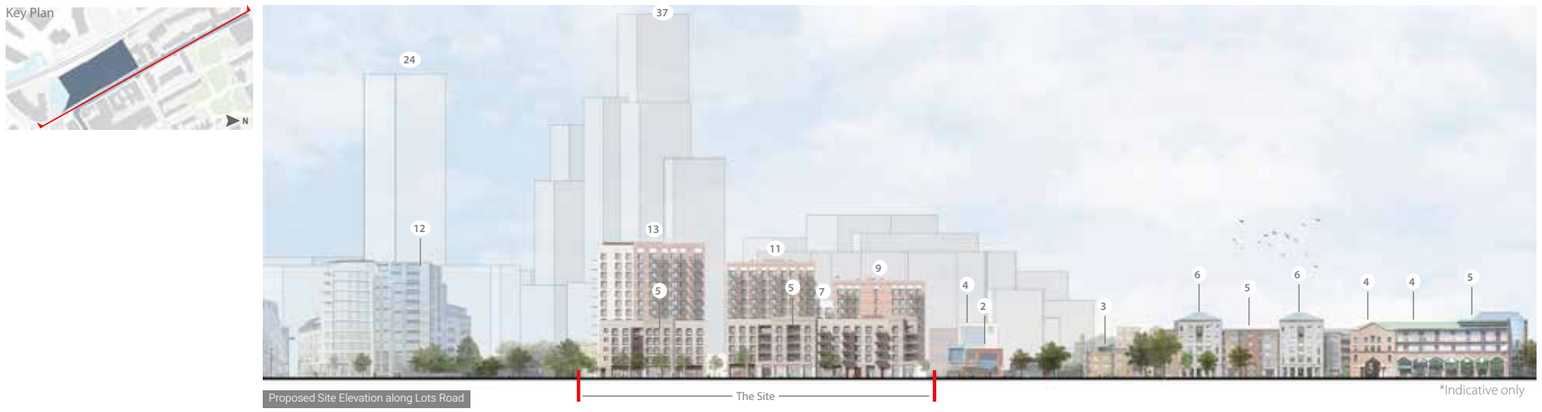


Figure 8.3 Context Elevation of the Proposed Development (With Cumulative Schemes). Source: DAS

Figure 8.4 View 6 from the South on Lots Road within the Conservation Area – Proposed

Figure 8.5 View 4 on Lots Road looking into the Conservation Area – Proposed

VIEWS OF BLOCKS A-C

8.24 The Proposed Development would introduce three tall buildings in the views looking south-west out of the conservation area. In most of the streets, the views would be partial or glimpsed of the Proposed Development and the heights would appear broadly consistent with the residential development in the foreground because of relative perspective – see **Figure 8.6**.

8.25 The Proposed Development would be the most visible from Burnaby Street where the stepped massing and east elevations of Block A-C will be legible – see **Figures 8.7 and 8.8**.

8.26 The conservation area is experienced in the context of taller development in its setting and the Proposed Development would therefore not be alien or harmful to its significance. The Proposed Development would contribute to the sense of enclosure that is part of the character of the conservation area and being closed away from the wider environment.

8.27 The relatively consistent building heights mean that the profile of the buildings is calm and not distracting in the conservation area, while the differentiation in height helps to break down the massing and respond to the vertical rhythm seen in the terraced development in the conservation area.

8.28 The materiality would be brick which would respond to the conservation area context and offers a contrast to the more modern materiality employed in developments to the south and south-west.

8.29 Blocks A-C would be set back from the conservation area boundary along the railway line edge of the Site. This would maximise the separation from the conservation area development and Blocks D and E would provide a transition in closer views near to the junction with Lots Road.

Figure 8.6 View 11 on Stadium Street in the Conservation Area – Proposed

Figure 8.7 View 8 on Burnaby Street near Ashburnham Road in the Conservation Area – Proposed

Figure 8.8 View 9 on Burnaby Street near Uverdale Road in the Conservation Area – Proposed

CUMULATIVE CONSIDERATIONS

8.30 This assessment has considered the consented schemes in the area that create the emerging context. In particular, Kings Road Park that would introduce tall buildings in the views from the conservation area that contain the Proposed Development.

8.31 The cumulative version of the verified view from Burnaby Street is presented at **Figure 8.9**. The AVR demonstrates how the setting of the conservation area to the south-west has already been changed by tall residential development on the former gasworks which will establish visual enclosure in the views westwards towards and past the Site. The Proposed Development would be appreciated as an intermediary layer on the boundary of the conservation area, and designed to relate to the characteristics of the asset namely ; the scheme would the brick materiality of Blocks A-C and massing which steps down to the north.

Figure 8.9 View 8 on Burnaby Street near Ashburnham Road in the Conservation Area – Cumulative

OVERALL ASSESSMENT

8.32 The significance of the Lots Village Conservation Area is derived from its historic interest and residential character which is inward-focussed and does not draw any significance from its setting. The existing buildings on the Site make a very low contribution to the setting and significance of the conservation area. The Proposed Development would transform the Site, and that change has been well-considered and would be experienced as part of the changing context of the area. The taller buildings on the railway line would not undermine the intrinsic significance of the conservation area.

8.33 On this basis we consider the significance would not be undermined by the Proposed Development and the conservation area would be preserved in accordance with national and development plan policy.

IMPERIAL SQUARE & GASWORKS CONSERVATION AREA AND LISTED BUILDINGS

8.34 The Imperial Square & Gasworks Conservation Area is subject of transformative change through the King's Road Park redevelopment.

8.35 The King's Road Park development introduces tall buildings to the north-east edge of the conservation area adjacent to the railway line that would contain the historic interests of the conservation to the west and screen views of the Proposed Development.

8.36 The significance and appreciation of the conservation area and the listed buildings within it would not be affected by the Proposed Development, which is physically separated by the King's Road Park development and the railway line. While visible, the Proposed Development would form part of the wider urban context and would not undermine the ability to appreciate significance of the conservation area. The buildings within the Site and along the railway would be appreciated as being separated from the conservation area by a major piece of infrastructure and so would not contend or draw attention from the principal and intrinsic interest of the asset.

8.37 We therefore conclude that the Proposed Development would preserve the setting and significance of the Imperial Square & Gasworks Conservation Area and listed buildings therein.

SANDFORD MANOR HOUSE, GRADE II* LISTED BUILDING

8.38 Sandford Manor House is located approximately 140m north-west of the Site at the nearest point. It is a large and altered late 17th century dwellinghouse and its intrinsic historic and architectural interests would be unaffected by the Proposed Development.

8.39 The original domestic setting of the listed building, i.e. private gardens, are much reduced and altered. The alterations in the setting of the house include the railway line to the east and the house is enclosed by low to mid-rise 20th century residential development.

8.40 There is no direct visibility of the Site from the gardens of the house, or publicly accessible locations where the listed building would be seen together with the Proposed Development. Furthermore, the consented Imperial Gasworks development will interpose between the Proposed Development and the listed building, introducing further modern development to its local setting.

8.41 The Proposed Development would not affect the intrinsic interests of the building, and the listed building does not draw any significance from the Site. The Proposed Development would not be seen together with the listed building in views where it is best appreciated, and consented schemes will interpose and further remove any potential visibility. The Proposed Development would be part of the wider setting that include modern development.

8.42 Therefore, the significance and appreciation of the listed building would be preserved.

LONDON COUNTY COUNCIL PUMPING STATION, GRADE II LISTED BUILDING

8.43 The London County Council Pumping Station is located approximately 310m east of the Site on Lots Road. It is included for assessment because of its proximity to the Site; however, the kink in the road near to the pumping station means that very little of the Proposed Development would be seen together with the listed building in views looking west on Lots Road. It would only be the upper parts of Block A that would be visible above the rooflines of the residential terrace opposite, and the visibility of distant taller buildings would not affect how the architecture of the Victorian pumping station or its relationship to the Power Station to the immediate west is appreciated and understood as part of the industrial townscape in this part of Lots Village. In any event, taller, modern residential buildings are emerging in this location, so forms part of the wider context.

8.44 The significance of the London County Council Pumping Station would be preserved by the Proposed Development.

BROMPTON CEMETERY AND ANGLICAN CHAPEL

8.45 Brompton Cemetery comprises a Grade I RPG and a conservation area. The verified views at **Figures 8.10 and 8.11** show in wireline how the Proposed Development would appear on the horizon in the views looking south on the central, ceremonial axis within the Cemetery.

8.46 The views are kinetic, and they make an important contribution to the significance of the Cemetery.

8.47 The views begin in an avenue of trees from the North Lodge where the Anglian Chapel, Grade II*, is the planned focal point. In the views through the avenue, the Proposed Development would be set away to the right of the chapel's dome and would be screened by the trees. A photograph of the avenue is provided at **Figure 8.12**.

8.48 At the end of the avenue, the upper storeys of Block A would appear on the horizon. Block A would be seen over approximately 720m from the chapel, and the human eye would understand the separating distance and depth between the two objects. The proposed materiality, a buff-coloured brick, would mean that Block A would have a consistent palette with the monuments and chapel in the foreground and would be recessive.

8.49 The strength of the planned Cemetery arrangement and its constituent buildings and monuments would be unaffected by Block A, and the materiality and simple form of the massing would not draw the eye or distract from an appreciation of the Victorian funerary landscape.

8.50 Block A would not interact with the silhouette of the Chapel nor, for the reasons given above, distract from an appreciation of the building in the planned arrangement with the hemicycle created by the Arcades.

8.51 Moving further south, towards the chapel in the kinetic sequence, the verified view at **Figure 8.11** shows how Block A would recede behind the trees that contain the southern edge of the Cemetery and would disappear. The visibility of the Proposed Development is therefore peripheral and fleeting and would not be distracting.

8.52 The views looking south from within Brompton Cemetery are already influenced by tall and modern development in the distance to the south and at the west edge of the Cemetery, so one is aware of the wider urban environment. The Proposed Development is not, therefore, introducing a new feature to the experience of the Cemetery.

8.53 The special interest of the conservation area and RPG that recognise Brompton Cemetery and the Chapel as a Grade II* listed building would be preserved by the Proposed Development. We note that the verified views show the winter conditions, and there would be increased screening of Block A in the summer months when the trees are in full leaf.

Figure 8.11 Verified View of the Proposed Development (Blue Wireline) from near to the Chapel in Brompton Cemetery

Figure 8.10 Verified View of the Proposed Development (Blue Wireline) from the South of the Arcades in Brompton Cemetery

Figure 8.12 Photograph of the View from the Avenue from the North Lodge, Part of the Sequence on the Ceremonial Axis

CUMULATIVE CONSIDERATIONS

8.54 The Kings Road Park development would appear in the views looking south from Brompton Cemetery and the cumulative verified views are presented at **Figures 8.13 and 8.14** (see also **Appendix 4.0**).

8.55 This assessment does not comment on the effect of the Kings Road Park development on the cemetery. That has been established by the grant of planning permission which is implemented. Instead, this assessment considers the effect of the Proposed Development with the cumulative schemes as the baseline.

8.56 In the views from the central axis, the Proposed Development would increase the amount of tall modern development that is seen above the horizon. The effect would be of short duration, from when the observer emerges from the avenue of trees to within the hemicycle formed by the arcades where the Proposed Development would recede from view.

8.57 The effect of the Proposed Development on the cemetery in the cumulative context is not considered to change. This is because there would be a clear visual separation between the Proposed Development and the tall buildings comprising Kings Road Park, and the impact of the Proposed Development is mainly derived from how it appears near to the Chapel in the views.

8.58 The Kings Road Park development further establishes the awareness of modern development in the wider surroundings, and the Proposed Development would be understood as part of this context and setting.

Figure 8.13 Cumulative Verified View of the Proposed Development (Blue Wireline) from the South of the Arcades in Brompton Cemetery

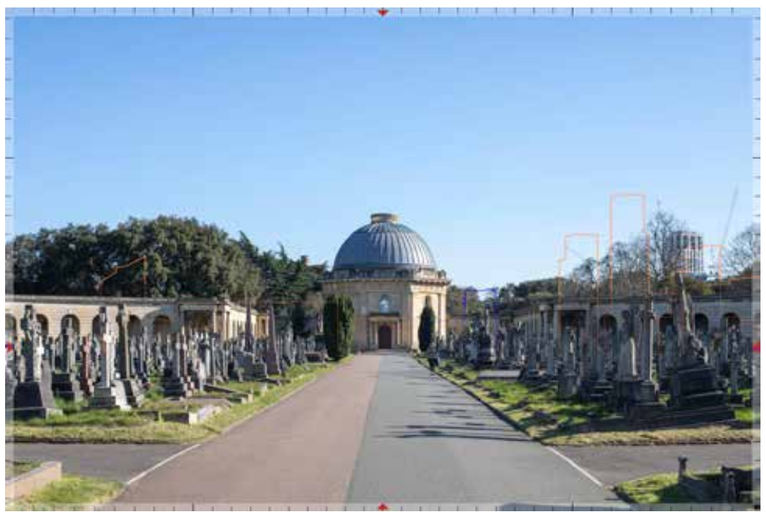


Figure 8.14 Cumulative Verified View of the Proposed Development (Blue Wireline) from near to the Chapel in Brompton Cemetery

9.0
ASSESSMENT: TOWNSCAPE
LOTS ROAD SOUTH

ASSESSMENT: TOWNSCAPE

9.1 This section assesses the effect of the Proposed Development on the townscape receptors identified at **Section 6.0**.

TOWNSCAPE ASSESSMENT

TCA1 LOTS ROAD COMMERCIAL/RETAIL

9.2 TCA1 is the commercial and retail development on Lots Road and includes the Site. The TCA is identified as having **Low/Medium value** at **Section 6.0**, which primarily recognises the historic interest and architectural quality of the Lots Road Power Station development to the south of the TCA. If it were not for the Power Station, the value of the TCA would be lower.

9.3 The Proposed Development would demolish the existing buildings on the Site and replace them with five new residential buildings between five and 13 storeys. There would be new landscaping to the south to provide amenity and access to the creek edge. The Proposed Development would directly affect the TCA and transform the character of the Site. Therefore, the susceptibility is **High** and the sensitivity is **Medium**.

9.4 The Proposed Development would introduce new five storey buildings on the Lots Road frontage (Blocks D and E) and buildings of nine, 11 and 13 storeys to the rear (Blocks A–C). Representative verified views and CGIs are provided at **Figures 9.1–9.5**.

9.5 Lots Road has a varied character in height, scale and appearance. The Proposed Development would not, therefore, be inconsistent with an established building type or grain, and it would add to the existing variety in the TCA.

9.6 The Proposed Development has evolved through extensive pre-application consultation and there is a clear logic to the overall architectural parti. The design development process is described in detail in the DAS.

9.7 The lower buildings, Blocks D and E, address the street frontage and the conservation area to the east, and this meets the requirements of the RBKC site allocation height restrictions and the Lots Road South SPD which requires development to step down to Lots Road.

9.8 The taller buildings, Blocks A–C, are located adjacent to the railway and continue the spine of taller development that extends from the south, closer to Imperial Wharf station. We observe that this massing strategy is consistent with the overall height principles set out in the Lots Road South SPD which suggests that taller parts of the development are located away from Lots Road to retain the character of the street.

9.9 In addition, there is historical precedent for the type of growth represented by the Proposed Development. The historic map regression illustrates that this part of Fulham evolved from greenfield to an industrial centre, and what is now proposed and has been seen in other recent developments echo the 19th and 20th century development as another layer of the area's evolution.

9.10 The five storey Blocks D and E fronting Lots Road will present an attractive frontage with variation in the building line and colour palette which will deliver a higher quality and more active west side of Lots Road than is experienced at present.

9.11 The buildings also provide permeability into the Site providing access to a community square and route through and around to the west side of the Site. In particular, the Creekside Promenade will provide a publicly accessible space within the TCA where it is possible to appreciate and enjoy the creek which has historical associations to the industrial uses and provides a physical link that connects the north part of the TCA with the south.

9.12 The Creekside Promenade area will be activated by the ground floor uses, which include a cafe and residential amenity in Block A, and flexible commercial uses in Block D. The ground floor uses are shown on the plan presented at **Figure 9.6**.

9.13 For the reasons described above, the magnitude of impact would be **Medium** and the likely effect would be **Moderate Beneficial**.

Figure 9.1 View 2 Lots Road adjacent to Westfield Park – Proposed

Figure 9.2 View 3 Lots Road at junction with Pooles Lane – Proposed

Figure 9.3 View 4 Burnaby Street west at junction with Lots Road – Proposed

Figure 9.4 View 5 Lots Road at junction with Upcerne Road – Proposed

Figure 9.5 CGI of the Proposed Development Looking North from Lots Road Public House. Source: DAS

Through development of the proposals, in consultation with the Boroughs, Community and Stakeholders, the adjacent ground floor arrangement has been arrived at. This arrangement provides a broad range of uses, all located in the appropriate place for functionality and active frontages.


Cafe: positioning a cafe at the edge of the Creek to better activate and make use of this local asset


Central residentia lobby: a welcoming entrance experience and generous space for residents


Potential for a gym


Residential amenity


Extra Care: will provide our most vulnerable residents a variety safe communal areas to interact.


Community Centre: will meet a local demand and will be handed back to the Council to manage


SIES: affordable commercial spaces to be handed back to RBKC.


Commercial: supporting local businesses. Provision of commercial suitable for a range of occupiers

Figure 9.6 Diagram of Proposed Ground Floor Uses. Source: DAS

TCA2 LOTS VILLAGE RESIDENTIAL

9.14 TCA2 is the residential area to the east of the Site comprising mainly Victorian two storey terraced housing in a linear street pattern. The area is recognised by a conservation area designation, and as such it has **High value** (see **Section 6.0**).

9.15 The Proposed Development would replace the existing buildings and hardstanding on the Site at the west edge of the TCA with a new residential and commercial development ranging from five storeys on the Lots Road frontage to taller buildings behind that step up in height to the south. There would be no change to the development within the TCA itself, or any effect on the uses or movement through the area. The effect is derived from how the Proposed Development would appear in views from the east-west routes through the TCA and on Lots Road. The Site is allocated for development, and so change is expected in line with the development plan. Therefore, the susceptibility of the TCA is **Low** and the sensitivity is **Medium**.

9.16 TCA2 is contained by development of varied type and scale on Lots Road to the west and south. There is already a contrast between the residential development and the surrounding context, which includes the Lots Road Power Station development and modern residential at Chelsea Waterfront.

9.17 The residential development within TCA2 does not interact with the Lots Road frontage to the Site to any meaningful extent and the verified views demonstrate that Blocks D and E would not be readily visible across the area. Blocks D and E would be consistent with the existing varied context that surrounds TCA2.

9.18 Blocks A-C would be visible from within TCA2 and introduce a greater scale of development to the appearance of the TCA. The verified views demonstrate how the Proposed Development would introduce a background layer to the residential development – see views 8, 9 and 11 which are reproduced at **Figures 9.7–9.9** to demonstrate the visual impact.

9.19 The taller buildings have been positioned on the west edge of the Site following the guidance in the Lots Road South SPD, and it is appropriate to position taller buildings along the railway line and continue the spine of modern development.

9.20 Blocks A-C are set back by approximately 27m from Lots Road (and further still from the Lots Village Conservation Area boundary) and this separating distance means that they would not be overbearing or unduly dominant on the skyline.

9.21 The proposed materiality is consistent with the built form in TCA2 and helps it to appear as a contextual addition in the views from the historic residential area. Similarly, the architectural expression of windows and balconies would respond to the regular proportions and repetition which is seen in the architecture of the terraces.

9.22 The magnitude of impact on TCA2 would be Low and the likely effect would be **Minor/Moderate Neutral**. The effect would be neutral because the value of the townscape within TCA2 would be no better or worse because of the Proposed Development.

Figure 9.7 View 8 Burnaby Street near Ashburnham Road – Proposed

Figure 9.8 View 9 Burnaby Street at junction with Upcerne Road – Proposed

Figure 9.9 View 11 Ashburnham Street at junction with Stadium Street – Proposed

TCA3 FORMER GASWORKS

9.23 TCA3 recognises the former gasworks site which is in a state of transition as it is undergoing redevelopment as King's Road Park. The competition of King's Road Park is considered under the cumulative assessment later in this section.

9.24 The townscape character of the TCA is described at **Section 6.0** and identified to have **Low/Medium value**.

9.25 The Proposed Development is physically separated from the TCA by the railway line. It would not change the appearance, function or movement through the TCA itself, and any effect would be derived from how the Proposed Development would appear in views looking east out of the TCA. Therefore, the susceptibility of the TCA is **Low** and the sensitivity is **Low**.

9.26 The impact of the Proposed Development on TCA has been informed by the ZTV and verified view nos. 15, 16 and 17. While the ZTV shows there would be visibility from across the TCA, this reflects the gasworks having been cleared and the temporary open condition. Furthermore, the TCA is largely not accessible to the public and views are restricted across the TCA from publicly accessible locations by hoarding and the restricted access to the development site.

9.27 Views 15 and 16 represent how the Proposed Development would appear from within TCA3. Its height would be consistent with existing developments in Chelsea Waterfront and continue the spine of taller buildings which are perceived along the railway line edge to the TCA. The residential uses would be consistent with the uses in TCA3 and the architectural design would be complementary.

9.28 The magnitude of impact on TCA3 is therefore **Low** and the likely effect would be **Minor Beneficial**.

Figure 9.10 View 15 Gwyn Close – Proposed

Figure 9.12 View 17 – Open space near Station Court – Proposed

Figure 9.11 View 16 King's Road Park – Proposed

TCA5 CHELSEA WATERFRONT RESIDENTIAL

9.29 TCA5 is the modern residential area to the south of the Site comprising Chelsea Waterfront. The townscape character of the TCA is described at **Section 6.0** and identified to have **Low/Medium value**.

9.30 The ZTV demonstrates that visibility of the Proposed Development from within the TCA would be limited, and the proposed scale and uses on the Site would be consistent with the modern residential development that defines the TCA. Therefore, the susceptibility of the TCA is **Low** and the sensitivity is **Low**.

9.31 There would be no change to the movement through or appearance of the TCA itself.

9.32 The Proposed Development would replace the low-rise light industrial buildings on the Site with a new residential development comprising five buildings of five to 13 storeys. The proposed uses would be consistent with the uses in TCA5 and complement the experience of the character area particularly in the views looking north over Chelsea Creek where the public realm would mirror the public realm within the TCA on the north side of the Chelsea Island development – see verified view at **Figure 9.13**.

9.33 In views from Chelsea Harbour Drive, the Proposed Development would be an attractive addition to the townscape and the use of brick in the Proposed Development would maintain a differentiation between the modern residential buildings in TCA5 and the Lots Village area to the north-west – see **Figure 9.15**.

9.34 The taller building may be glimpsed from within the TCA. It would not be alien to the experience of modern development within the TCA and largely occluded by the buildings within the character area.

9.35 The magnitude of impact on TCA5 is therefore **Low** and the likely effect would be **Minor Beneficial**.

Figure 9.13 View 7 Harbour Yard at creek edge – Proposed

Figure 9.14 CGI of the Creekside Promenade. Source: DAS

Figure 9.15 CGI of the View of the Proposed Development from within Chelsea Waterfront. Source: DAS

CUMULATIVE

9.36 This assessment has considered whether consented schemes would change the effects of the Proposed Development on the TCAs. The consented schemes that have been considered are listed at **Appendix 3.0** and they are shown as wirelines in the verified views at **Appendix 4.0**.

9.37 The relevant consented scheme to the effect of the Proposed Development on the TCAs is Kings Road Park that will redevelop the former gasworks site to the west. The Kings Road Park development would introduce tall buildings to the views through TCAs 1 and 2 (Lots Road and Lots Village) in the same area that would be affected by the Proposed Development. This would establish taller, modern residential development and a contrast to the existing townscape. In the cumulative context, the Proposed Development would be a layer in the foreground of Kings Road Park and introduce development of contrasting scale closer to the TCAs. Given the proximity and physical relationship between the Proposed Development and the TCAs on the east side of the railway, the magnitude of impact and likely effect of the Proposed Development are only considered to change for TCA2 Lots Village, which would reduce to **Minor Neutral**.

Figure 9.16 View 3 Lots Road at junction with Pooles Lane (TCA1) – Cumulative

Figure 9.17 View 5 Lots Road at junction with Upcerne Road (TCA1) – Cumulative

Figure 9.18 View 8 Burnaby Street near Ashburnham Road (TCA2) – Cumulative

SUMMARY

9.38 The townscape assessment is summarised in **Table 9.1**.

TCA REF.	TCA	TOWNSCAPE VALUE	SUSCEPTIBILITY	SENSITIVITY	PROPOSED DEVELOPMENT		CUMULATIVE	
					MAGNITUDE OF IMPACT	LIKELY EFFECT	MAGNITUDE OF IMPACT	LIKELY EFFECT
1	Lots Road Commercial/Retail	Low/Medium	High	Medium	Medium	Moderate Beneficial	Medium	Moderate Beneficial
2	Lots Village Residential	High	Medium	Medium	Low	Minor/Moderate Neutral	Low	Minor Neutral
3	Former Gasworks	Low/Medium	Low	Low	Low	Minor Beneficial	Low	Minor Beneficial
5	Chelsea Waterfront Residential	Low/Medium	Low	Low	Low	Minor Beneficial	Low	Minor Beneficial

Table 9.1 Summary of Townscape Assessment

10.0
ASSESSMENT: VISUAL

LOTS ROAD SOUTH

ASSESSMENT: VISUAL

10.1 This section assesses the effect of the Proposed Development on the visual amenity of the visual receptors identified in **Section 7.0**.

PROPOSED DEVELOPMENT

LOTS ROAD

10.2 The kinetic sequence of views travelling north to south on Lots Road is provided as verified views, nos. 1–6. The verified views demonstrate how the Proposed Development would appear in this sequence, introducing five storey buildings to Lots Road with nine, 11 and 13 storeys to the rear of the Site adjacent to the railway line.

10.3 Lots Road is varied in terms of architecture, height and scale. It is mainly 20th century redevelopments with some earlier buildings. The views are well-contained until reaching Westfield Park and the Lots Village residential area where the views are more open because of the low-rise development to the east.

10.4 The Proposed Development would replace the low-rise industrial buildings and increase the scale and density on the Site. The residents would have **High susceptibility** and **Medium sensitivity**. Pedestrians and workers have **Medium susceptibility** and **Low/Medium sensitivity**. The road users have **Low susceptibility** and **Low sensitivity**.

10.5 The Proposed Development is the result of extensive pre-application consultation, and the massing has responded to feedback received from consultees. The lower Blocks, E and D, address Lots Road and they have consistent scale with existing development on Lots Road and provide a step down to the residential area to the east as required by the SPD. The long elevation to Lots Road is articulated through variation in the building line and colour palette to help break down the width and retain variety in the area.

10.6 In views from the south (see verified view 5) the scale of Block E responds well to the pub on the comer and the lighter materiality emphasises the prominence of the historic building in the view. The narrow return of Block E that faces the creek helps to reduce the sense of mass and scale, and there are views into the Creekside Promenade and new public realm within the Site.

10.7 The street trees and landscaping in the Creekside Promenade will help to soften and improve the appearance of the townscape Lots Road, particularly over and above the existing use and character of the Site.

10.8 The taller buildings are located on the railway line which is a suitable and appropriate location for height. The height of the buildings has been subject to extensive testing as described in the DAS. Blocks A–C are set back from Lots Road and they are peripheral in the kinetic views on Lots Road itself because the orientation, proximity and interposing development. The stepping heights helps to reduce the width and appearance of the height, as is evident in view 3 from the junction with Pooles Lane (**Figure 10.3**).

10.9 In the views from the south limb of Lots Road, Blocks A–C appear as part of the layered, modern development emerging around the former Lots Road Power Station and they are consistent with the heights of buildings that line the street due to relative perspective.

10.10 The magnitude of impact on the visual amenity of Lots Road is High and the likely effect on residents would be **Moderate/Major Beneficial**, and **Moderate Beneficial** on pedestrians, workers and road users.

Figure 10.19 View 1 Lots Road north – Proposed

Figure 10.20 View 2 Lots Road adjacent to Westfield Park – Proposed

Figure 10.21 View 3 Lots Road at junction with Pooles Lane – Proposed

Figure 10.23 View 5 Lots Road at junction with Upcerne Road – Proposed

Figure 10.22 View 4 Burnaby Street west at junction with Lots Road – Proposed

Figure 10.24 View 6 Lots Road at Chelsea Harbour Drive – Proposed

CHELSEA CREEK

10.11 The verified view shows how the Proposed Development would transform the north side of Chelsea Creek where seen from the public realm on the opposite side. Blocks A and E would address the creek and there would be oblique views into the Proposed Development and the internal-facing elevations. The susceptibility of all visual receptors would be **High** and their sensitivity would be **Medium**.

10.12 The Proposed Development would introduce a more attractive edge to the creek with public realm at the Creekside Promenade and planting. The verified view does not show the options for landscape features with the creek itself which remain subject to option testing. This would further enhance the appearance and interest of the creek as a landscape feature in the urban area.

10.13 Blocks A and E are set back from the new creek wall by between 6.3m and 8.5m and the separating distance and landscaping that would be noticed by the human eye means that the Proposed Development would not be overbearing, despite introducing a 13 storey building to the south-west corner of the Site. The creek itself is approximately 35m wide from north to south and this also means the Proposed Development would not be overbearing.

10.14 Block E and the other buildings to Lots Road would step down to address the lower scale of development that is visible to the right (east) in the views. This would likewise reduce the impact of the massing, and the tall Block E would be understood as a single object and focal point.

10.15 The brick is a contextual response to the development to the north and east that is seen from this vantage point and in contrast to the modern development at Chelsea Waterfront. The projecting balconies add interest and the subtle detailing in the brickwork is attractive.

10.16 The eye is drawn into the Site and the double height ground floor. The public square and landscape is attractive and lifts the overall amenity of the views.

10.17 For the reasons described above, the magnitude of impact is **High** and the likely effect would be **Moderate/Major Beneficial** for pedestrians and residents using the creekside public realm.

Figure 10.25 View 7 Harbour Yard at creek edge – Proposed

LOTS VILLAGE

10.18 The Proposed Development would appear in the east-west axial views from the Lots Village residential area represented by verified views 8–11. The verified views show how Blocks A–C would appear above the rooflines of the traditional terraced housing. Blocks D and E, at five storeys to Lots Road, would be limited in terms of visibility across the area. The susceptibility of residents would be **High** and their sensitivity would be **Medium/High**. The susceptibility of pedestrians would be **Medium** and the sensitivity would be **Medium**.

10.19 The Proposed Development would contrast with the prevailing character of the views in terms of their scale and height. This is not inconsistent with the experience of the visual amenity of the area however, which already includes contrasts between the residential area and surrounding taller developments and developments of greater scale such as the former Lots Road Power Station.

10.20 The taller buildings are set back from the street frontage and there would be a separating distance between them and the residential development in the foreground. The materiality would be of a complementary texture and palette, and the windows and architectural details would help to break down the massing and respond to the repetitive features that are seen in the historic terraces.

10.21 There are only one or two locations where the long side elevations will be visible, and for the most part the Proposed Development would be glimpsed partially and consistent with heights in the foreground due to relative perspective.

10.22 The magnitude of impact would be **Medium** on all receptors because the visual assessment considers the effect on visual amenity of people in an area, rather than static views. In this case, there are many places within Lots Village where the Proposed Development would not affect the visual amenity of the area, because it would not be visible or influence the experience of the area. The likely effect would be **Moderate Beneficial** for all receptors because it achieves the objectives of the site allocation, and the architecture would be attractive.

Figure 10.26 View 8 Burnaby Street near Ashburnham Road – Proposed

Figure 10.27 View 9 Burnaby Street at junction with Upcerne Road – Proposed

Figure 10.28 View 10 Stadium Street – Proposed

Figure 10.29 View 11 Ashburnham Road at junction with Stadium Street – Proposed

BROMPTON CEMETERY

10.23 The visual effect on Brompton Cemetery is mainly considered because of the potential impact on the heritage designations comprising the cemetery. The verified views demonstrate how Block A would appear on the horizon of the cemetery in the important views on the central ceremonial axis. Only the upper storeys of Block A would be visible and they would recede and be occluded from view as the receptors move south towards the Chapel.

10.24 The visual amenity is focussed on the cemetery itself and inward-looking. There is an awareness of tall and modern development in the surrounding area; however, the planned layout and strong architectural features of the cemetery command the attention. The Proposed Development would not interact with any of the key skyline features or appear to any great or noticeable extent on the skyline. It would be a peripheral background feature and the light materiality would help to reduce its visual presence.

10.25 It is noted that there would be a separating distance of approximately 900m between the viewer and Block A in the views from the cemetery also, and the distance and atmospheric haze would also help to reduce visibility or prominence.

10.26 Therefore, the visual receptors have **Low or Medium susceptibility** and **Medium** or **Medium/High sensitivity** to the Proposed Development – see **Table 10.1** for the full breakdown. The magnitude of impact is **Very Lo**w and the likely effect on visual amenity would be **Negligible Neutral** for all receptors.

Figure 10.30 View 12 Brompton Cemetery northern pathway – Proposed

Figure 10.31 View 13 Brompton Cemetery within arcades – Proposed

KING'S ROAD

10.27 The blue wireline on the verified view 14 demonstates that the Proposed Development would be occluded by vegetation in the foreground that screens the railway line from the residential development on Redwell Street. The susceptibility would be **High** for residents, given their frequency of using the area, and **Low** for pedestrians which results in sensitivity of **Medium** and **Low** respectively. The magnitude of impact would be **Nil** and the likely effect would be **None**.

Figure 10.32 View 14 King's Road at Redwell Street – Proposed

KINGS ROAD PARK

10.28 The verified views demonstrate how Blocks A–C would appear from Kings Road Park to the west of the Site. The verified views are taken from locations that are presently accessible and provide views of the Site. It is noted that the area is a construction site and in a state of transition, therefore, the cumulative assessment may be more relevant.

10.29 In the views from the west, the stepped heights of Blocks A–C, varied building line and variation in the colour palette may be appreciated. This helps to break down the breadth and scale of the massing in response to feedback from officers during pre-application advice. The options testing is described in full in the DAS.

10.30 The views from the west of the railway are generally less sensitive due to the separating distance involved, the inclusion of a major piece of infrastructure (the railway), and boundary walls associated with the eastern edge of the Kings Road Park development. Where the development will be visible the 13 storey building will appear to have its own identity, responding to Chelsea Island, and gentle stepping down in height away from that crescendo.

10.31 The susceptibility of residents would be **High** and their sensitivity would be **Medium**. The susceptibility of pedestrians would be **Medium** and their sensitivity would be **Low/Medium**. The magnitude of impact would be **Medium** and the likely effect would be **Moderate Beneficial** on residents and **Minor/Moderate Beneficial** on pedestrians.

Figure 10.33 View 15 Gwyn Close – Proposed

Figure 10.34 View 16 King's Road Park – Proposed

Figure 10.35 View 17 – Open space near Station Court – Proposed

IMPERIAL WHARF

10.32 The verified view 18 shows the Proposed Development as a render from the platform at Imperial Wharf station. The south elevations of Blocks A–C would appear obliquely in the views, mostly occluded behind the Lighterman Tower building in the foreground. The height of the Proposed Development would be continuous with the development seen in the foreground and the palette of materials would be consistent also. The Proposed Development would continue the spine of development along the railway and define the edge of the transport corridor.

10.33 The susceptibility of visual receptors to the Proposed Development is **Low** given that they would be focussed on their journey and would not dwell here for the view itself. The sensitivity is **Low/Medium**. For the reasons given above, the magnitude of impact would be **Very Low** and the likely effect would be **Negligible Beneficial**.

BATTERSEA BRIDGE

10.34 The verified views at 19, A and B demonstrate how the Proposed Development would appear in views from the river and river crossings to the east of the Site.

10.35 The blue wirelines in the views from Battersea Bridge show that the Proposed Development would be consistent with the established height datum in the view provided by modern developments seen to either side. It would be part of the layered and varied modern townscape that defines the riverside and contributes positively to the visual interest of the riparian views.

10.36 In the views from Battersea Bridge, Blocks A and B would be visible. Their light brick facades would complement and add variety against the red brick, white cladding and glazed buildings that are already in the view.

10.37 The view from St Mary's Church at Battersea on the riverside is provided to demonstrate that the Proposed Development would be barely visible and there would be no change to visual amenity in this location.

10.38 The susceptibility and sensitivity of the visual receptors is set out in full in **Table 10.1** The magnitude of impact of the Proposed Development in the views from Battersea Bridge would be **Very Low** and the likely effect would be **Negligible Beneficial** for all receptors.

Figure 10.38 View A St Mary's Battersea (London Borough of Wandsworth) – Proposed

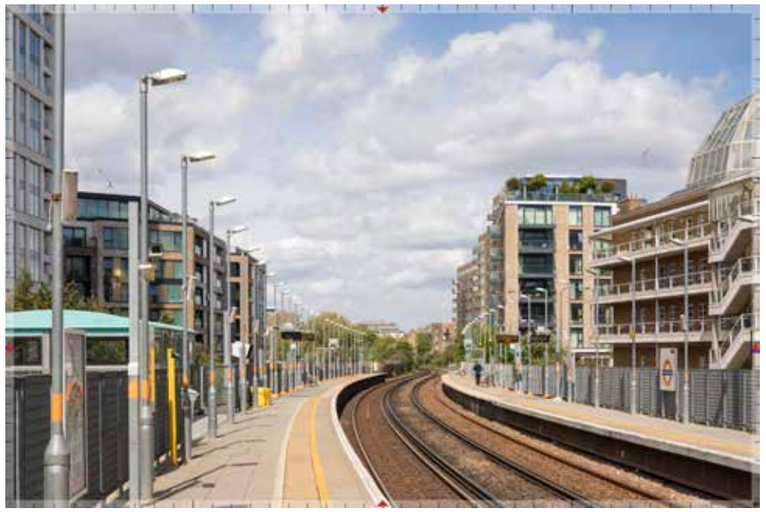


Figure 10.36 View 18 Imperial Wharf Platform – Proposed

Figure 10.37 View 19 Battersea Bridge Road – Proposed

Figure 10.39 View B Battersea Bridge 2 (London Borough of Wandsworth) – Proposed

WESTFIELD PARK

10.39 The blue wireline on the verified view of view 20 demonstrates how the Proposed Development would appear in views looking south from Westfield Park. The Proposed Development would be seen over approximately 150m from the visual receptors and the open green space is understood as part of a residential area, where development is visible at the edges. The Proposed Development would be screened in the summer months by tree cover.

10.40 The separating distance and tree cover, even in winter months, mean that the Proposed Development would not be prominent or overbearing in views from the park. The visual receptors would likely remain focussed on their activities within the open green space, either for leisure or as a route through the area. The Proposed Development would appear in the context of existing built form and add an additional layer to the urban context.

10.41 The susceptibility of residents is **High** given the frequency of their use of the area. Their sensitivity is **Medium**. For pedestrians it is **Medium susceptibility** and **Low/Medium sensitivity**. The magnitude of impact would be **Very Low** for the reasons given above, and the likely effect would be **Negligible Neutral** for all receptors.

Figure 10.40 View 20 Westfield Park – Proposed

CUMULATIVE

10.42 This assessment has considered whether consented schemes would change the effects of the Proposed Development on the TCAs. The consented schemes that have been considered are listed at **Appendix 3.0** and they are shown as wirelines in the verified views at **Appendix 4.0**. The likely effects would change for the visual receptors described below. For all other receptors, the likely effects would remain the same because the cumulative schemes would not change the nature or extent of the visibility of the Proposed Development.

LOTS VILLAGE

10.43 The Kings Road Park cumulative scheme would introduce tall buildings in the views looking west out of Lots Village. This scheme establishes the principle of tall buildings seen in views looking out of the residential area. The Proposed Development would appear in the foreground of the Kings Road Park scheme and create a transition layer between the traditional residential development and the modern residential development beyond. For this reason, the layering and helping to instil a transition, the likely effect of the Proposed Development is considered to improve in the cumulative context to **Moderate/Major Beneficial**.

Figure 10.41 View 8 Burnaby Street near Ashburnham Road – Cumulative

Figure 10.42 View 9 Burnaby Street at junction with Upcerne Road – Cumulative

Figure 10.43 View 10 Stadium Street – Cumulative

KINGS ROAD PARK

10.44 The views from Kings Road Park will be substantively altered when the masterplan for the area is completed. The visibility of the Proposed Development would be reduced and where visible, appreciated in a context of taller buildings that realise the optimisation of sites coming forward for redevelopment. The magnitude of impact on visual receptors in Kings Road Park would reduce to **Very Low** and the likely effect would be **Negligible Beneficial**.

Figure 10.46 View 16 King's Road Park – Cumulative

Figure 10.44 View 11 Ashburnham Road at junction with Stadium Street – Cumulative

Figure 10.45 View 15 Gwyn Close – Cumulative

Figure 10.47 View 17 – Open space near Station Court – Cumulative

SUMMARY

10.45 The visual assessment is summarised at **Table 10.1**.

VIEW NOS.	LOCATION	VISUAL AMENITY VALUE	VISUAL RECEPTORS	SUSCEPTIBILITY	SENSITIVITY	PROPOSED DEVELOPMENT		CUMULATIVE	
						MAGNITUDE OF IMPACT	LIKELY EFFECT	MAGNITUDE OF IMPACT	LIKELY EFFECT
1–6	Lots Road	Low	Residents	High	Medium	High	Moderate/Major Beneficial	High	Moderate/Major Beneficial
			Pedestrians	Medium	Low/Medium	High	Moderate Beneficial	High	Moderate Beneficial
			Workers	Medium	Low/Medium	High	Moderate Beneficial	High	Moderate Beneficial
			Road Users	Low	Low	High	Moderate Beneficial	High	Moderate Beneficial
7	Chelsea Creek	Low/Medium	Residents	High	Medium	High	Moderate/Major Beneficial	High	Moderate/Major Beneficial
			Pedestrians	Medium	Medium	High	Moderate/Major Beneficial	High	Moderate/Major Beneficial
(4–6) 8–11	Lots Village	Medium	Residents	High	Medium/High	Medium	Moderate Beneficial	Medium	Moderate/Major Beneficial
			Pedestrians	Medium	Medium	Medium	Moderate Beneficial	Medium	Moderate/Major Beneficial
12, 13	Brompton Cemetery	High	Pedestrians	Medium	Medium/High	Very Low	Negligible Neutral	Very Low	Negligible Neutral
			Cyclists	Low	Medium	Very Low	Negligible Neutral	Very Low	Negligible Neutral
			Visitors	Medium	Medium/High	Very Low	Negligible Neutral	Very Low	Negligible Neutral
14	King's Road	Low	Residents	High	Medium	Nil	None	Nil	None
			Pedestrians	Low	Low	Nil	None	Nil	None
15–17	Kings Road Park	Low	Residents	High	Medium	Medium	Moderate Beneficial	Very Low	Negligible Beneficial
			Pedestrians	Medium	Low/Medium	Medium	Minor/Moderate Beneficial	Very Low	Negligible Beneficial
18	Imperial Wharf	Low/Medium	Pedestrians	Low	Low/Medium	Very Low	Negligible Beneficial	Very Low	Negligible Beneficial
19, A	Battersea Bridge	Medium	Pedestrians	Medium	Medium	Very Low	Negligible Beneficial	Very Low	Negligible Beneficial
			Road Users	Low	Low/Medium	Very Low	Negligible Beneficial	Very Low	Negligible Beneficial
20	Westfield Park	Low/Medium	Residents	High	Medium	Very Low	Negligible Neutral	Very Low	Negligible Neutral
			Pedestrians	Medium	Low/Medium	Very Low	Negligible Neutral	Very Low	Negligible Neutral

Table 10.1 Summary of Visual Assessment

11.0
CONCLUSION
LOTS ROAD SOUTH

CONCLUSION

11.1 Montagu Evans have prepared this HTVIA on behalf of Mount Anvil (Lots Road) LLP to consider the effect of the Proposed Development for Lots Road South on heritage assets, local townscape character and visual amenity.

11.2 The Proposed Development seeks to clear the existing buildings on the Site and introduce a new mixed-use development to deliver 274 new homes and just over 2,000m2 of non-residential floorspace including flexible commercial use, education, art gallery space and community space.

11.3 The Proposed Development comprises five buildings ranging from five to 13 storeys. There would be two five storey buildings on Lots Road, Blocks D and E, and Blocks A–C would step up to the south at 13, 11 and nine storeys respectively.

11.4 The Site is unusual because it straddles the boundaries of the RBKC and LBHF. There has been due and proper regard to the development plans of both boroughs, as well as the London Plan, NPPF and statutory provisions in the 1990 Act that apply to listed buildings and conservation areas.

11.5 The Proposed Development seeks to achieve the objectives of the RBKC Site Allocation which includes the Site, Site Allocation SA6 Lots Road South, which identifies the Site for *"high-quality mixed-use development that is employment led, to include residential and employment floorspace"* (part A). The requirements of the site allocation policy are considered in more detail in **Section 11.0**.

POLICY COMPLIANCE

HERITAGE

11.6 The assessment at **Section 8.0** identifies that the significance of listed buildings in the area surrounding the Site would be preserved by the Proposed Development and the requirements of Section 66(1) of the 1990 Act would be met by the Proposed Development and development plan policies: London Plan Policy HC1, LBHF Policy DC8 and RBKC Policies CD3 and CD5.

11.7 The character and appearance of the Sands End Conservation Area would be preserved and enhanced by the Proposed Development in accordance with Section 72(1) of the 1990 Act and development plan policies: London Plan Policy HC1, LBHF Policies DC8 and RBKC Policies CD3 and CD4. The enhancement to the Sands End Conservation Area is a heritage benefit that may be given great weight in the planning balance.

11.8 The character and appearance of the Lots Village Conservation Area would also be preserved by the Proposed Development. This would meet the requirements of development plan policy, as the setting of conservation areas is not protected by statute: London Plan Policy HC1, LBHF Policy DC8 and RBKC Policies CD3 and CD4.

11.9 The Imperial Square & Gasworks Conservation Area would likewise be preserved by the Proposed Development.

11.10 There would be harm to the non-designated heritage assets on the Site comprising Nos. 65–59 Lots Road because of their demolition to achieve the Proposed Development. It is noted that option were tested for retention and the DAS explains the reasons why this has not been proposed. The demolition is justified on the basis of optimising the development of the Site in accordance with the site allocation.

11.11 Non-designated heritage assets are a planning consideration and do not receive great weight. Paragraph 216 of the NPPF is engaged, which requires *"a balanced judgement [will be required] having regard to the scale of any harm or loss and the significance of the heritage asset"*. The non-designated heritage asset on the Site has low significance because they are typical of their type as interwar industrial buildings and have been heavily altered internally. The demolition of the buildings has been accepted in principle in pre-application consultation.

DESIGN AND VIEWS

11.12 The townscape and visual assessment at **Sections 9.0 and 10.0** has identified beneficial or neutral effects on the townscape and visual receptors. This demonstrates that the requirements of policy are met in terms of high quality and contextual design and having regard to local views – see London Plan Policy D3 and HC3, LBHF Policies DC1, DC2 and DC7 and RBKC Policies CD1, CD2, CD15 and Site Allocation SA6.

11.13 In reference to the policy provisions for Site Allocation SA6, it is noted that:

11.13.1 The building heights would be commensurate with the stated indicative range of 22m–34m or six to 10 storeys at part E. The supporting text to the Site Allocation and the RBKC tall buildings policy notes that the "maximum building height is expressed as a range to allow for a distribution and variation of heights across the site. The site is of a scale that it can accommodate a variety of building heights" (paragraph 3.22 of the RBKC New Local Plan Review).

11.13.2 The Proposed Development would introduce a range of building heights to contribute to a varied skyline/massing profile and respect the existing context considerations, i.e. the lower scale and traditional development to the north on Lots Road and to the east in Lots Village.

11.13.3 Blocks A and B would be 11 and 13 storeys and this is considered acceptable on the basis that there would be no adverse effects on townscape character and views, and the massing is the result of consultation with both boroughs.

11.13.4 The Proposed Development would preserve and enhance heritage assets in accordance with part I of the site allocation policy.

11.13.5 The Proposed Development would introduce a series of buildings on Lots Road with modest variation in form that steps down in height across the Site to respond to Lots Road (Blocks D and E). This meets the terms of part J.

11.13.6 The architecture and materials will reflect the industrial heritage and character of the area as required by part K. The new buildings would be brick with metal detailing in the balconies that would have an industrial aesthetic.

11.13.7 The taller development is located to the west of the Site and set back from Lots Road as required by part L.

11.13.8 Active frontages would be maintained as per part M and help to introduce vitality to the streetscape and neighbouring conservation area.

11.13.9 There would be publicly accessible spaces and new public realm provided on the Site, and a particular enhancement and improved appreciation and access to the creek (parts N, P and Q).

TALL BUILDINGS

11.14 The Proposed Development would introduce tall buildings and the assessment of the heritage, townscape and visual effects has been considered in light of the tall building development plan policies.

LONDON PLAN POLICY D9

11.15 The Site is not located in an identified tall building zone in either borough, and so it does not pass the policy test at part B of London Plan Policy D9. It has been confirmed by recent High Court decisions[4] that part B is not a gateway test however, and tall building proposals may be acceptable outside these areas if the tests at part C and local plan policy are met.

11.16 This report has assessed the visual impact of the Proposed Development in immediate, mid-range and distant views in accordance with part C, 1 of Policy D9. The effects on visual amenity have been found to be beneficial or neutral and so the requirements of this part of the policy are met:

11.16.1 The accurate visual representation is prepared by Miller Hare illustrate the static and kinetic sequences that are found in the local and wider area.

11.16.2 In local views, particularly when travelling from the north or south along Lots Road, visual receptors will be most aware of Blocks D and E with active frontages trees, new pavement and hard landscaping.

11.16.3 In the views from Burnaby Street and within the Lots Village Conservation Area, Blocks A–C would appear behind the prevailing height of Lots Road. In these views, one would be able to appreciate the gaps between the buildings and the frontage on the eastern side of the railway that will include the larger development within former gasworks.

11.16.4 The materiality, fenestration and composition of Blocks A–C has helped to break down the scale of those buildings and successfully tied the development into its context and as part of a cohesive whole.

11.16.5 In longer distance views from the River Thames the development would appear as part of a varied skyline, largely occluded by development in the middle-ground and foreground. The massing composition would be consistent with the established datum and appear as a new and high quality addition.

11.17 The Proposed Development is part of a site allocation. As such, it is part of a location which is subject to intensification and the Proposed Development would reinforce the spatial hierarchy of the spine of modern residential development from Imperial Wharf and what is emerging to the west through Kings Road Park. The Proposed Development therefore meets the requirements of Policy D9 part C, 1, b.

11.18 This report concludes that the Proposed Development would preserve or enhance the special interest of heritage assets, and it therefore complies with part C, 1, d and e.

11.19 The other parts of Policy D9 are outside the expertise of this report, and they are addressed elsewhere in the submission and the Planning Statement by Rolfe Judd.

LBHF POLICY DC3

11.20 The assessment in **Sections 9.0 and 10.0** demonstrates that the Proposed Development would:

11.20.1 Have a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form (part a) and the silhouette contributes positively to the surrounding area (part b);

11.20.2 Have an acceptable impact on the skyline and views from and to open spaces and waterways – in this case, the view across Chelsea Creek (see AVR view no. 7) and the longer distance views from the River Thames (see AVR view nos. 19, A and B) (part c);

11.20.3 It would preserve and enhance heritage assets (part d); and

11.20.4 It provides ground floor activity and would engage with new public realm and landscaping (parts f and g).

11.21 The other policy provisions under LBHF Policy DC3 are considered elsewhere in the submission, including the DAS which conveys the architectural quality of the Proposed Development and may be secured via condition (part b).

RBKC POLICY CD8

11.22 A small part of Blocks A and B (13 and 11 storeys) falls within the RBKC administrative boundary. RBKC Policy CD8 identifies the Site as suitable for tall buildings, and the Proposed Development therefore complies with part B of London Plan Policy D9 in this regard and the RBKC's policy.

11.23 RBKC's tall buildings policy does not provide any design or assessment criteria for the acceptability of tall buildings and we refer to their design and heritage policies above.

11.24 However, the supporting text at paragraph 6.65 reiterates Site Allocation SA6 and states that the appropriate heights will be subject to further testing.

11.25 The further testing required by the policy is demonstrated by the design evolution described in the DAS. That testing process involved an assessment of the heritage, townscape and visual impacts of the various massing iterations.

11.26 While the heights proposed are marginally greater than the Site Allocation, they are considered acceptable on the basis of the further testing provided by the application which demonstrates that the significance of heritage assets would be preserved and there would be beneficial or neutral effects on townscape character and visual amenity.

CONCLUSION

11.27 Overall, we consider that the Proposed Development represents a balance between the effects of new development of height, scale and mass as against the need to optimise the Site. On that basis we consider that the development complies with the design and heritage policies contained in the statutory development plan.

4 See Master Brewer decision: *London Borough of Hillingdon, R (On the Application Of) v Mayor of London* [2021] EWHC 3387 (Admin)

APPENDIX 1: AVR METHODOLOGY BY MILLER HARE

LOTS ROAD SOUTH

A1 Accurate Visual Representations

A1.1 Each of the views in this study has been prepared as an Accurate Visual Representation (AVR) following a consistent methodology and approach to rendering. Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012) defines an AVR as:

> *"An AVR is a static or moving image which shows the location of a proposed development as accurately as possible; it may also illustrate the degree to which the development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure and can therefore be relied upon by assessors to represent fairly the selected visual properties of a proposed development. AVRs are produced by accurately combining images of the proposed building (typically created from a three-dimensional computer model) with a representation of its context; this usually being a photograph, a video sequence, or an image created from a second computer model built from survey data. AVRs can be presented in a number of different ways, as either still or moving images, in a variety of digital or printed formats."*

A1.2 The Landscape Institute Technical Guidance Note 06/19 "Visual Representation of Development Proposals" notes that the production of technical visualisations:

> "should allow competent authorities to understand the likely effects of the proposals on the character of an area and on views from specific points."

A1.3 Paragraph 2.2 highlights that the baseline photography should:

> *"be sufficiently up-to-date to reflect the current baseline situation"*
>
> *"include the extent of the site and sufficient context;"*
>
> *"be based on good quality imagery, secured in good, clear weather conditions wherever reasonably possible;"*

A1.4 In this study the baseline condition is provided by carefully taken large format photography. The proposed condition is represented as an accurate photomontage, which combines a computer generated image with the photographic context. In preparing AVRs of this type certain several key attributes need to be determined, including:

- the Field of View
- the representation of the Proposed Development
- documentation accompanying the AVR

Selection of Field of View

A1.5 The choice of telephoto, standard or wide-angle lens, and consequently the Field of View, is made on the basis of the requirements for assessment which will vary from view to view.

A1.6 In the simple case the lens selection will be that which provides a comfortable Viewing Distance. This would normally entail the use of what most photographers would refer to as a "standard" or "normal" lens, which in practice means the use of a lens with a 35mm equivalent focal length of between about 40 and 58 mm.

A1.7 However in a visual assessment there are three scenarios where constraining the study to this single fixed lens combination would not provide the assessor with the relevant information to properly assess the Proposed Development in its context.

Field Of View

The term 'Field Of View' (FOV) or more specifically Horizontal Field of View (HFOV), refers to the horizontal angle of view visible in a photograph or printed image and is expressed in degrees. It is often generally referred to as 'angle of view', 'included angle' or 'view cone angle'.

Using this measure it becomes practical to make a comparison between photographs taken using lens of various focal lengths captured on to photographic film or digital camera sensors of various size and proportions. It is also possible to compare computer renderings with photographic images.

Studies of this type use a range of camera equipment; in recent times digital cameras have largely superseded the traditional film formats of 35mm, medium format (6cm x 6cm) and large format (5in x 4in). Comparing digital and film formats may be achieved using either the HFOV or the 35mm equivalent lens calculation, however quoting the lens focal length (in mm) is not as consistently applicable as using the HFOV when comparing AVRs.

35mm Lens	HFOV degrees	Lens focal length (mm)
Wide angle lens	74.0	24
Medium wide lens	54.4	35
Standard lens	39.6	50
Telephoto lens	28.8	70
Telephoto lens	20.4	100
Telephoto lens	10.3	200
Telephoto lens	6.9	300

The FOV of digital cameras is dependent on the physical dimensions of the CCD used in the camera. These depend on the make and model of the camera. The comparison table uses the specifications for a Canon EOS-5D Mark II which has CCD dimensions of 36.0mm x 22.0mm.

A1.8 Firstly, where the relationship being assessed is distant, the observer would tend naturally to focus closely on it. At this point the observer might be studying as little as 5 to 10 degrees in plan. The printing technology and image resolution of a print limit the amount of detail that can be resolved on paper when compared to the real world, hence in this situation it is appropriate to make use of a telephoto lens.

A1.9 Secondly, where the wider context of the view must be considered and in making the assessment a viewer would naturally make use of peripheral vision in order to understand the whole. A print has a fixed extent which constrains the angle of view available to the viewer and hence it is logical to use a wide angle lens in these situations in order to include additional context in the print.

A1.10 Thirdly where the viewing point is studied at rest and the eye is free to roam over a very wide field of view and the whole setting of the view can be examined by turning the head. In these situations it is appropriate to provide a panorama comprising of a number of photographs placed side by side.

A1.11 The Landscape Institute Technical Guidance Note 06/19 Appendix 1 suggests that where a standard lens in landscape or portrait orientation cannot capture the view then the use of wider-angled prime lenses should be considered. Appendix 13 further notes:

> *"The 24mm tilt shift is typically used for visualisation work where viewpoints are located close to a development and the normal range of prime lenses will not capture the proposed site"*

A1.12 For some views two of these scenarios might be appropriate, and hence the study will include two versions of the same view with different fields of view.

Representation of the Proposed Development and cumulative schemes

Classification of AVRs

A1.13 AVRs are classified according to their purpose using Levels 0 to 3. These are defined in detail in Appendix C of the London View Management Framework: Supplementary Planning Guidance (July 2007). The following table is a summary.

AVR level	showing	purpose
AVR 0	Location and size of proposal	Showing Location and size
AVR 1	Location, size and degree of visibility of proposal	Confirming degree of visibility
AVR 2	As level 1 + description of architectural form	Explaining form
AVR 3	As level 2 + use of materials	Confirming the use of materials

A1.14 In practice the majority of photography based AVRs are either AVR 3 (commonly referred to as "fully rendered" or "photoreal") or AVR 1 (commonly referred to as "wire-line"). Model based AVRs are generally AVR 1.

AVR 3 – Photoreal

Example of AVR 3 – confirming the use of materials (in this case using a 'photo-realistic' rendering technique)

A1.15 The purpose of a Level 3 AVR is to represent the likely appearance of the Proposed Development under the lighting conditions found in the photograph. All aspects of the images that are able to be objectively defined have been created directly from a single detailed description of the building. These include the geometry of the building and the size and shape of shadows cast by the sun.

A1.16 Beyond this it is necessary to move into a somewhat more subjective arena where the judgement of the delineator must be used in order to define the final appearance of the building under the specific conditions captured by the photographic and subsequent printing processes. In this area the delineator is primarily guided by the appearance of similar types of buildings at similar distances in the selected photograph. In large scope studies photography is necessarily executed over a long period of time and sometimes at short notice. This will produce a range of lighting conditions and photographic exposures. The treatment of lighting and materials within these images will respond according to those in the photograph.

A1.17 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials was the best judgment of the visualiser as to the likely appearance of the scheme given the intended lighting strategy and the ambient lighting conditions in the background photograph. In particular the exact lighting levels are not based on photometric calculations and therefore the resulting image is assessed by the Architect and Lighting Designer as being a reasonable interpretation of the concept lighting strategy.

AVR 1 – Outline

Example of AVR 1 confirming degree of visibility (in this case as an occluded 'wire-line' image)

A1.18 The purpose of a wire-line view is to accurately indicate the location and degree of visibility of the Proposed Development in the context of the existing condition and potentially in the context of other proposed schemes.

A1.19 In AVR1 representation each scheme is represented by a single line profile, sometimes with key edges lines to help understand the massing. The width of the profile line is selected to ensure that the diagram is clear, and is always drawn inside the true profile. The colour of the line is selected to contrast with the background. Different coloured lines may be used in order to distinguish between proposed and consented status, or between different schemes.

A1.20 Where more than one scheme is represented in outline form the outlines will obscure each other as if the schemes where opaque. Trees or other foliage will not obscure the outline of schemes behind them. This is because the transparency of trees varies with the seasons, and the practical difficulties of representing a solid line behind a filigree of branches. Elements of a temporary nature (e.g. cars, tower cranes, people) will similarly not obscure the outlines.

Framing the view

A1.21 Typically AVRs are composed with the camera looking horizontally i.e. with a horizontal Optical Axis. This is in order to avoid converging verticals which, although perspectively correct, appear to many viewers as unnatural in print form. The camera is levelled using mechanical levelling devices to ensure the verticality of the Picture Plane, being the plane on to which the image is projected; the film in the case of large format photography or the CCD in the case of digital photography.

A1.22 For a typical townscape view, a Landscape camera format is usually the most appropriate, giving the maximum horizontal angle of view. Vertical rise may be used in order to reduce the proportion of immediate foreground visible in the photograph. Horizontal shift will not be used. Where the prospect is framed by existing buildings, portrait format photographs may be used if this will result in the proposal being wholly visible in the AVR, and will not entirely exclude any relevant existing buildings.

A1.23 Where the Proposed Development would extend off the top of the photograph, the image may be extended vertically to ensure that the full height of the Proposed Development is show. Typically images will be extended only where this can be achieved by the addition of sky and no built structures are amended. Where it is necessary to extend built elements of the view, the method used to check the accuracy of this will be noted in the text.

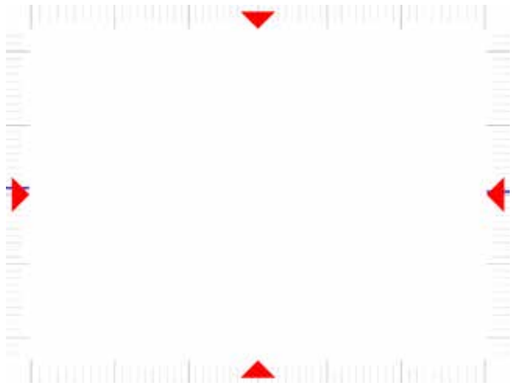
Documenting the AVR

Border annotation

A1.24 A Millerhare AVR image has an annotated border or 'graticule' which indicates the field of view, the optical axis and the horizon line. This annotation helps the user to understand the characteristics of the lens used for the source photograph, whether the photographer applied tilt, vertical rise or horizontal shift during the taking of the shot and if the final image has been cropped on one or more sides.

A1.25 The four red arrows mark the horizontal and vertical location of the 'optical axis'. The optical axis is a line passing through the eye point normal to the projection plane. In photography this line passes through the centre of the lens, assuming that the film plane has not been tilted relative to the lens mount. In computer rendering it is the viewing vector, i.e the line from the eye point to the target point.

A1.26 If the point indicated by these marks lies above or below the centre of the image, this indicates either that vertical rise was used when taking the photograph or that the image has subsequently been cropped from the top or bottom edge. If it lies to the left or right of the centre of the image then cropping has been applied to one side or the other, or more unusually that horizontal shift was applied to the photograph.

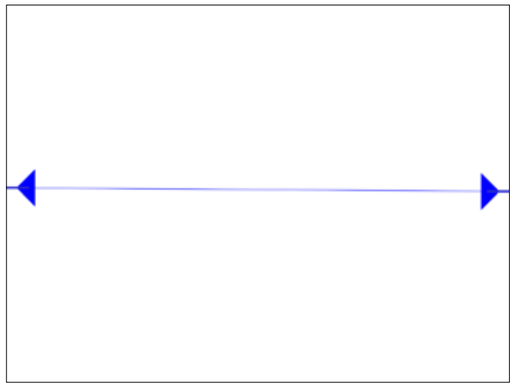


Sample graticule showing optical axis markers

A1.27 The vertical and horizontal field of view of the final image is declared using a graticule consisting of thick lines at ten degree increments and intermediate lines every degree, measured away from the optical axis. Using this graticule it is possible to read off the resultant horizontal and vertical field of view, and thereby to compare the image with others taken using specific lens and camera combinations. Alternatively it can be used to apply precise crops during subsequent analysis

A1.28 .

A1.29 The blue marks on the left and right indicate the calculated location of the horizon line i.e. a plane running horizontally from the location of the camera. Where this line is above or below the optical axis, this indicates that the camera has been tilted; where it is not parallel with the horizontal marking of the optical axis, this indicates that the camera was not exactly horizontal, i.e. that "roll" is present. Note that a small amount of tilt and roll is nearly always present in a photograph, due to the practical limitations of the levelling devices used to align the camera in the field.



Sample graticule showing horizon line markers

Comparing AVRs with different FOVs

A1.30 A key benefit of the index markings is that it becomes practical to crop out a rectangle in order to simulate the effect of an image with a narrower field of view. In order to understand the effect of using a longer lens it is simply necessary to cover up portions of the images using the graticule as a guide.

A2 Methodology for the production of Accurate Visual Representations

Overview of Methodology

A2.1 The study was carried out by Millerhare (the Visualiser) by combining computer generated images of the Proposed Development with either large format photographs or with rendered images from a context model at key strategic locations around the site as agreed with the project team. Surveying was executed by Absolute Survey (the Surveyor).

A2.2 The methodology employed by Millerhare is compliant with Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012) and Landscape Institute Technical Guidance Note 06/19.

A2.3 The project team defined a series of locations in London where the proposed buildings might have a significant visual effect. At each of these locations Millerhare carried out a preliminary study to identify specific Assessment Points from which a representative and informative view could be taken. Once the exact location had been agreed by the project team, a photograph was taken which formed the basis of the study. The precise location of the camera was established by the Surveyor using a combination of differential GPS techniques and conventional observations.

A2.4 For views where a photographic context was to be used additional surveying was carried out. A number of features on existing structures visible from the camera location were surveyed. Using these points, Millerhare has determined the appropriate parameters to permit a view of the computer model to be generated which exactly overlays the appropriate photograph. Each photograph has then been divided into foreground and background elements to determine which parts of the current context should be shown in front of the Proposed Development and which behind. When combined with the computer-generated image these give an accurate impression of the impact of the Proposed Development on the selected view in terms of scale, location and use of materials (AVR Level 3).

Spatial framework and reference database

A2.5 All data was assembled into a consistent spatial framework, expressed in a grid coordinate system with a local plan origin. The vertical datum of this framework is equivalent to Ordnance Survey (OS) Newlyn Datum.

A2.6 By using a transformation between this framework and the OSGB36 (National Grid) reference framework, Millerhare have been able to use other data sets (such as OS land line maps and ortho-corrected aerial photography) to test and document the resulting photomontages.

A2.7 In addition, surveyed observation points and line work from Millerhare's London Model database are used in conjunction with new data in order to ensure consistency and reliability.

A2.8 The models used to represent consented schemes have been assembled from a variety of sources. Some have been supplied by the original project team, the remainder have been built by Millerhare from available drawings, generally paper copies of the submitted planning application. While these models have not been checked for detailed accuracy by the relevant architects, Millerhare has used its best endeavours to ensure that the models are positioned accurately both in plan and in overall height.

Process – photographic context

Reconnaissance

A2.9 At each Study Location the Visualiser conducted a photographic reconnaissance to identify potential Assessment Points. From each candidate position, a digital photograph was taken looking in the direction of the Proposed Development using a wide angle lens. Its position was noted with field observations onto an OS map and recorded by a second digital photograph looking at a marker placed at the Assessment Point.

A2.10 In the situation where, in order to allow the appreciation of the wider setting of the proposal, the assessor requires more context than is practical to capture using a wide angle lens, multiple photographs may be combined to create a panorama, typically as a diptych or triptych. This will be prepared by treating each panel as a separate AVR and then combining in to a single panorama as a final process.

A2.11 The Visualiser assigned a unique reference to each Assessment Point and Photograph.

Final Photography

A2.12 From each selected Assessment Point a series of large format photographs were taken with a camera height of approximately 1.6m. The camera, lens, format and direction of view are determined in accordance with the policies set out above

A2.13 Where a panoramic view is specified the camera/tripod head is rotated through increments of 40 degrees to add additional panels to the left and/or right of the main view.

A2.14 The centre point of the tripod was marked and a digital photograph showing the camera and tripod in situ was taken to allow the Surveyor to return to its location. Measurements and field notes were also taken to record the camera location, lens used, target point and time of day.

Surveying the Assessment Points

A2.15 For each selected Assessment Point a survey brief was prepared, consisting of the Assessment Point study sheet and a marked up photograph indicating alignment points to be surveyed. Care was taken to ensure that a good spread of alignment points was selected, including points close to the camera and close to the target.

A2.16 Using differential GPS techniques the Surveyor established the location of at least two intervisible stations in the vicinity of the camera location. A photograph of the GPS antenna in situ was taken as confirmation of the position.

A2.17 From these the local survey stations, the requested alignment points were surveyed using conventional observation.

A2.18 The resulting survey points were amalgamated into a single data set by the Surveyor. This data set was supplied as a spreadsheet with a set of coordinates transformed and re-projected into OSGB36 (National Grid) coordinates, and with additional interpreted lines to improve the clarity of the surveyed data.

A2.19 From the point set, the Visualiser created a three dimensional alignment model in the visualisation system by placing inverted cones at each surveyed point.

Photo preparation

A2.20 From the set of photographs taken from each Assessment Point, one single photograph was selected for use in the study. This choice was made on the combination of sharpness, exposure and appropriate lighting.

A2.21 The selected photograph was copied into a template image file of predetermined dimensions. The resulting image was then examined and any artefacts related to the digital image capture process were rectified.

A2.22 Where vertical rise has been used the image is analysed and compensation is applied to ensure that the centre of the image corresponds to the location of the camera's optical axis.

Calculating the photographic alignment

A2.23 A preliminary view definition was created within the visualisation system using the surveyed camera location, recorded target point and FOV based on the camera and lens combination selected for the shot

A2.24 A lower resolution version of the annotated photograph was attached as a background to this view, to assist the operator to interpret on-screen displays of the alignment model and other relevant datasets.

A2.25 Using this preliminary view definition, a rendering was created of the alignment model at a resolution to match the scanned photograph. This was overlaid onto the background image to compare the image created by the actual camera and its computer equivalent. Based on the results of this process adjustments were made to the camera definition. When using a wide angle lens observations outside the circle of distortion are given less weighting.

A2.26 This process was iterated until a match had been achieved between the photograph and alignment model. At this stage, a second member of staff verified the judgements made. An A3 print was made of the resulting photograph overlaid with the alignment model as a record of the match. This was annotated to show the extents of the final views to be used in the study.

Example of alignment model overlaid on the photograph

Preparing models of the Proposed Development

A2.27 A CAD model of the Proposed Development was supplied by the Architect. The level of detail applied to the model is appropriate to the AVR type of the final images.

A2.28 Models of the Proposed Development and other schemes are located within the spatial framework using reference information supplied by the Architect or, when not available, by best fit to other data from the spatial framework reference database . Study renders of the model are supplied back to the Architect for confirmation of the form and the overall height of the Proposed Development. The method used to locate each model is recorded. Each distinct model is assigned a unique reference code by the Visualiser.

Determining occlusion and creating simple renderings

A2.29 A further rendering was created using the aligned camera, which combined the Proposed Development with a computer-generated context. This was used to assist the operator to determine which parts of the source image should appear in front of the Proposed Development and which behind it. Using this image and additional site photography for information, the source file is divided into layers representing foreground and background elements.

A2.30 In cases where the Proposed Development is to be represented in silhouette or massing form (AVR1 or AVR2), final renderings of an accurate massing model were generated and inserted into the background image file between the foreground and background layers.

A2.31 Final graphical treatments were applied to the resulting image as agreed with the Architect and environmental and planning consultants. These included the application of coloured outlines to clarify the reading of the images or the addition of tones to indicate occluded areas.

Creating more sophisticated renderings

A2.32 Where more sophisticated representations of the Proposed Developments were required (AVR3) the initial model is

developed to show the building envelope in greater detail. In addition, definitions were applied to the model to illustrate transparency, indicative material properties and inter-reflection with the surrounding buildings.

A2.33 For each final view, lighting was set in the visualisation system to match the theoretical sunlight conditions at the time the source photograph was taken, and additional model lighting placed as required to best approximate the recorded lighting conditions and the representation of its proposed materials.

A2.34 By creating high resolution renderings of the detailed model, using the calculated camera specification and approximated lighting scenario, the operator prepared an image of the building that was indicative of its likely appearance when viewed under the conditions of the study photograph. This rendering was combined with the background and foreground components of the source image to create the final study images.

A2.35 A single CAD model of the Proposed Development has been used for all distant and local views, in which the architectural detail is therefore consistently shown. Similarly a single palette of materials has been applied. In each case the sun angles used for each view are transferred directly from the photography records.

A2.36 Material definitions have been applied to the models assembled as described. The definitions of these materials have been informed by technical notes on the planning drawings and other available visual material, primarily renderings created by others. These resulting models have then been rendered using the lighting conditions of the photographs.

A2.37 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials was the best judgment of the visualiser as to the likely appearance of the scheme given the intended lighting strategy and the ambient lighting conditions in the background photograph.

A2.38 Where a panoramic view is specified each panel is prepared by treating each photograph as an individual AVR following the process described in the previous paragraphs. The panels are then arranged side by side to construct the panorama. Vertical dividers are added to mark the edge of each panel in order to make clear that the final image has been constructed from more than one photograph.

Documenting the study

A2.39 For each Assessment Point a CAD location plan was prepared, onto which a symbol was placed using the coordinates of the camera supplied by the Surveyor. Two images of this symbol were created cross-referencing background mapping supplied by Ordnance Survey.

A2.40 The final report on the Study Location was created which shows side by side, the existing and proposed prospect. These were supplemented by images of the location map, a record of the camera location and descriptive text. The AVR level is described.

A2.41 Peripheral annotation was added to the image to clearly indicate the final FOV used in the image, any tilt or rise, and whether any cropping has been applied.

A2.42 Any exceptions to the applied policies or deviations from the methodology were clearly described.

A2.43 Where appropriate, additional images were included in the study report, showing the Proposed Development in the context of other consented schemes.

Creating 360 degree bubble views

A2.44 Typically, bubble images are generated from a single photograph captured using a 360-degree bubble high resolution camera. The camera is set-up to capture images with a horizontal optical axis, positioned at a height of approximately 1.6 meters (average eye level). The camera's orientation is directed towards the most prominently visible element of the site.

A2.45 The captured image is subsequently processed through dedicated software, which disassembles the RAW 360-degree bubble view into six individual images, each corresponding to the faces of a virtual cube. Each planar image has a field of view of 90 degrees vertically and horizontally, representing the projection of the captured scene onto the interior of the cube.

A2.46 To ensure precise alignment, the camera's tripod centre point is marked, and reference photography documenting the camera and tripod setup is taken. This allows the Surveyor to accurately return to the original camera position for the detailed GPS view survey. Additionally, measurements and field notes are recorded to document the camera's location, lens specifications, target point, and time of day.

A2.47 Each of the six panels is then aligned using the survey data and verified in accordance with our standard methodology detailed within the Methodology for the Production of Accurate Visual Representations. Alignment and verification are conducted only for the panels containing the proposal within its frames.

A2.48 Following compositing of the proposal into the relevant panels, the six individual views are processed using the same dedicated software to reassemble them into a single image. This final image can be displayed as an interactive 360-degree bubble view through a web browser.

APPENDIX 2: SUMMARY OF THE HERITAGE SCOPE

LOTS ROAD SOUTH

SUMMARY OF BUILT HERITAGE SCOPE

MAP REF.	HERITAGE ASSET	GRADE (IF APPLICABLE)	FULL ASSESSMENT REQUIRED?
Listed Buildings			
1	Sandford Manor House	II*	Yes
2	Gasholder No 2, Fulham Gasworks	II*	Yes
3	Stanley House	II*	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in views looking north and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
4	Office Building at The Former Imperial Gas Works	II	Yes
5	War Memorial	II	Yes
6	Former Laboratory at The Imperial Gas Works	II	Yes
7	Original School Building and Chapel at Former College of St Mark and St John	II	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in views looking north and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
8	London County Council Pumping Station	II	Yes
9	Carlyle Building at The Hortensia Road Centre	II	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in views looking west and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
10	Octagon at College of St Mark and St John	II	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in close views and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
11	The Sloane School at The Hortensia Road Centre	II	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in close views and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
12	Chapel at College of St Mark and St John	II	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in close views and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
13	308–328, Fulham Road SW10	II	While the ZTV indicates some visibility of the Proposed Development near to the listed building, this would be in views looking away from the listed building to the south and there would be no intervisibility with the listed building or change to any appreciation of it, when it is primarily regarded in views looking north and as part of a complex with the listed buildings nearby. The separating distance and interposing development mean the immediate setting would not change, and the listed building does not draw any significance from the Site.
Conservation Areas			
A	Lots Village Conservation Area	N/A	Yes
B	Sands End Conservation Area	N/A	Yes
C	Imperial Square & Gasworks Conservation Area	N/A	Yes

MAP REF.	HERITAGE ASSET	GRADE (IF APPLICABLE)	FULL ASSESSMENT REQUIRED?
D	Moore Park Conservation Area	N/A	The separating distance and interposing development mean that the conservation area does not draw any significance from the Site. The ZTV indicates there may be glimpsed views of the upper parts of the building indicated by the ZTV: these views would be fleeting and over a distance, and taller developments in the wider context already form part of the appreciation of the conservation area. There would be no visibility from the majority of the conservation area and its significance as an area of historic residential development would be unchanged.
E	The College of St Mark & St John Conservation Area	N/A	The separating distance and interposing development mean that the conservation area does not draw any significance from the Site. The ZTV indicates there may be glimpsed views of the upper parts of the building indicated by the ZTV: these views would be fleeting and over a distance, and taller developments in the wider context already form part of the appreciation of the conservation area. There would be no visibility from the majority of the conservation area and its significance as an area of historic residential development would be unchanged.
F	The Billings Conservation Area	N/A	The ZTV indicates there would be no visibility from this conservation area.
G	Brompton Cemetery Conservation Area	N/A	Yes
H	Sloane/Stanley Conservation Area	N/A	The ZTV indicates there would be no visibility from this conservation area.
I	Thames Conservation Area	N/A	There would be views of the Proposed Development from the river crossings in this conservation area. The verified views demonstrate how the Proposed Development would appear within the context of other tall building developments at Lots Road/Chelsea Creek and there would be no change to how the heritage interest the conservation area are appreciated.
J	Battersea Square Conservation Area	N/A	There would be views of the Proposed Development from the river crossings and the south bank of the River Thames in this conservation area. The verified views demonstrate how the Proposed Development would appear within the context of other tall building developments at Lots Road/Chelsea Creek and there would be no change to how the heritage interest the conservation area are appreciated.
Registered Park and Gardens			
29	Brompton Cemetery RPG	I	Yes
Locally Listed Buildings			
14	562 Kings Road SW6 (Former Wheatsheaf P.H.)	N/A	The locally listed buildings do not draw any significance from the Site and the separating distance and interposing development mean that the Proposed Development would either not appear in their setting or would have no effect on how the local heritage interest of the buildings is appreciated.
15	Metal 'Book sculpture' bench (outside Nos 547 to 557 odd)	N/A	
16	No. 577 Kings Road, Imperial Arms Public House	N/A	
17	617 Kings Road SW6, Former Hand & Flower P.H	N/A	
18	Nos. 85 & 87 Waterford Rd W6 Former Gasworks Restaurant	N/A	
19	1A Imperial Rd SW6	N/A	
20	Nos. 19-33 (Odd) Harwood Terrace SW6	N/A	
21	Nos. 2-12 (even) Bagley's Lane (SW6)	N/A	
22	No. 58 Bagley's Lane Queen Elizabeth PH	N/A	
23	Grove House Day Nursery	N/A	
24	Nos. 410-416 (Even) Hammersmith and Fulham	N/A	
25	Nos. 404 A-D (The Studios) Fulham Road	N/A	
26	Nos. 1-13 (consec) Chelsea Studio's	N/A	
27	Nos. 422-432 (even) Fulham Road	N/A	
28	434-438 (even) Fulham Road	N/A	
Non-Designated Heritage Assets			
30	Nos. 65-69 Lots Road	N/A	Yes

Table A1.1 Summary of Built Heritage Scope

APPENDIX 3: LIST OF CUMULATIVE SCHEMES

LOTS ROAD SOUTH

LOTS ROAD ADJACENT CUMULATIVE DEVELOPMENT

Royal Borough of Kensington and Chelsea

Address	Ref.	Description of Development	Date of Approval	Stage of Development
Lots Road Power Station, London SW10 0QD	PP/02/01324	Conversion of Power Station to provide a mix of residential, retail, office, business and restaurant uses, together with erection of a 30 storey residential tower with ground floor gym, a 3-8 storey building incorporating commercial and residential uses, a 7 storey residential building, associated parking, servicing and landscaping, and works to Chelsea Creek, including three pedestrian bridges.		Under construction
Earls Court Development Land bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road, and the West London Railway Line (WLL) including 344-350 Old Brompton Road; AND 1 Cluny Mews, LONDON, SW5	PP/24/05187	Hybrid planning application for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed use development above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures, comprising: Outline proposals for up to 204,000sqm GEA of floorspace for residential (Use Class C3) use (up to 1,090 homes) and non-residential uses comprising hotel (Use Class C1), older persons housing (Use Class C2), office and/or research and development (Use Class E(g), education (Use Class E(f)/F1), retail, food and beverage and other commercial uses (Use Class E(a)/(b)/(c)), leisure facilities (Use Class E(d)), cultural facilities (Use Class F1), storage and distribution (Use Class B8), community and social facilities (Use Class E(e)/(f)/F2) and sui generis uses comprising student accommodation and co-living, theatre, car showroom, nightclub, drinking establishment (with or without expanded food provision), hot food takeaway, live music performance venue, cinema, concert hall, bingo hall and dance hall uses). Detailed proposals for two buildings of up to 109m AOD and 80.1m AOD in height for residential use (up to 39,020sqm GEA to provide up to 310 homes) (Use Class C3), and non-residential uses comprising: up to 322sqm GEA of office and/or research and development floorspace (Use Class E(g)); up to 1,319sqm GEA of retail/food and beverage/commercial floorspace (Use Classes E(a)/(b)/(c)); and up to 340sqm GEA of community/social floorspace (Use Classes E(e)/(f)/F)		*Under consideration*
344-350 Old Brompton Road, LONDON, SW5 9JU	PP/21/00272	Redevelopment of the site to provide new residential units (Class C3) and flexible commercial (CLass E) floorspace within a new building ranging in height from 4 to 9 storeys; together with plant and cycle parking facilities and associated servicing, access, landscaping and all associated ancillary works and structures	01/10/2021	Under construction
97-109 Cromwell Road, LONDON, SW7 4DN	PP/18/03461	Comprehensive redevelopment and erection of part 30, part 22, and part 7 storey building comprising hotel bedrooms and serviced apartments (Class C1) with ancillary bar, restaurants, conferencing and dining areas, leisure facilities, and back of house areas; and new homes [including affordable homes] (Class C3); with associated basement, energy centre, plant, car parking, cycle parking, refuse stores, and servicing areas; associated highway works; and creation of new publicly accessible open space with associated hard and soft landscaping.	11/05/2021	Under construction

Site Allocations	
Reference	**Key Details**
Site Allocation SA11: The Plaza, 535 King's Road	The site will deliver a high-quality mixed-use development. **Developable** Years 6 to 10 – 28 homes **Land use** B. Office or business floorspace at a quantum equal to or above the existing gross floorspace. C. A minimum of 28 (Class C3) residential units. **Principles** D. Provision of active retail frontages facing Lots Road and/ King's Road should be explored. E. Where the development is in the setting of a designated heritage asset, following the requirements of Part E of Policy CD3, the significance of the designated heritage asset should be preserved or opportunities taken better to reveal that significance.

London Borough of Hammersmith and Fulham

Address	Ref.	Description of Development	Date of Approval	Stage of Development
Fulham Gas Works Imperial Road, London	2018/02100/COMB	Planning Application (part-detailed, part-outline) for demolition of existing buildings and structures (excluding No.2 Gasholder, 1856 Chief Engineer's Office, 1927 Former Research Laboratory, 1920 WW1 War Memorial and WW2 War Memorial) and redevelopment to provide a residential-led mixed use development comprising the erection of new buildings ranging from 1 to 37 storeys to provide up to 1,843 (including 646 Affordable Housing) residential units and ancillary residential facilities (C3 Use) and non-	08/02/2019	Under construction

		residential floorspace in Use Classes A1, A2, A3, A4, B1, D1 and D2, the provision of a new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, basement level car park with integral servicing areas, interim works and other associated works: 1) Detailed planning application for 37,774sqm (GEA) residential floorspace together with 712sqm (GEA) ancillary residential facilities (C3 Use); 982sqm (GEA) flexible commercial floorspace (A1, A2, A3, A4 Uses); 3,432sqm (GEA) community and leisure floorspace (D1/D2 Use); provision of a 10,365sqm (GEA) basement; new pedestrian and vehicular access; provision of amenity space, landscaping, car and cycle parking, refuse storage, energy centre, servicing area, and other associated infrastructure works. 2) Outline planning application (with all matters reserved) for up to 166,560sqm (GEA) residential floorspace and ancillary residential facilities (C3 Use); up to 6,895sqm non-residential floorspace comprising flexible commercial retail (A1, A2, A3, A4 Uses), office (B1 Use), community (D1 Use) and leisure (D2 Use) floorspace; provision of up to 30,573sqm (GEA) new basement level; new pedestrian and vehicular access; and associated amenity space, publicly accessible open space, landscaping, car and cycle parking, refuse storage, energy centres, servicing area, and other associated infrastructure works.		
Earls Court Development Land bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road, and the West London Railway Line (WLL) including 344-350 Old Brompton Road; AND 1 Cluny Mews, LONDON, SW5	PP/24/05187	Hybrid planning application for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed use development above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures, comprising: Outline proposals for up to 204,000sqm GEA of floorspace for residential (Use Class C3) use (up to 1,090 homes) and non-residential uses comprising hotel (Use Class C1), older persons housing (Use Class C2), office and/or research and development (Use Class E(g), education (Use Class E(f)/F1), retail, food and beverage and other commercial uses (Use		*Under consideration*

		Class E(a)/(b)/(c)), leisure facilities (Use Class E(d)), cultural facilities (Use Class F1), storage and distribution (Use Class B8), community and social facilities (Use Class E(e)/(f)/F2) and sui generis uses comprising student accommodation and co-living, theatre, car showroom, nightclub, drinking establishment (with or without expanded food provision), hot food takeaway, live music performance venue, cinema, concert hall, bingo hall and dance hall uses). Detailed proposals for two buildings of up to 109m AOD and 80.1m AOD in height for residential use (up to 39,020sqm GEA to provide up to 310 homes) (Use Class C3), and non-residential uses comprising: up to 322sqm GEA of office and/or research and development floorspace (Use Class E(g)); up to 1,319sqm GEA of retail/food and beverage/commercial floorspace (Use Classes E(a)/(b)/(c)); and up to 340sqm GEA of community/social floorspace (Use Classes E(e)/(f)/F)		
Quayside Lodge William Morris Way London SW6 2UZ	2017/03561/FUL	Redevelopment to create a ten storey (with basement) building providing flexible office floorspace (Class B1) at ground floor level and 110 private and affordable residential units across the upper floors (Class C3). Secure basement car and cycle parking and refuse storage provided at basement level accessed from a ramp on William Morris Way. Associated landscaping works to William Morris Way and Potters Road.	28/09/2018	Under construction
51 Townmead Road London SW6 2SY	2015/04076/VAR	Variation of permission ref. 2013/02290/VAR by way of variation to condition number 3 to enable the relocation of the substation, the William Morris Way units and the main pedestrian access route within Phase 2 and the addition of B1 use to one of the commercial units fronting Central Avenue within phase 2. The revisions result in a proposal comprising 'Redevelopment to provide a supermarket (up to 7,246 sqm net retail floorspace), 467 residential homes (ranging 3-17 storeys in height), a crèche (152m2), restaurants/cafes/bars (482m2), B1 Office (126m2) a training centre (118m2) and a gym (128m2) within Use Classes A1, A3 and A4, C3, B1, D1 and D2, a riverside walk, landscaped gardens, public open space and the use of the jetty as a landscaped ecological area, together with car and cycle parking, servicing, access and the demolition and part demolition of the existing buildings'	10/07/2017	Complete

Land At Albert Wharf And Swedish Wharf Wandsworth Bridge Road London SW6 2TY	2021/03898/FUL	Demolition of all existing buildings and structures; provision of new buildings ranging from 5 to 17 storeys in height comprising: safeguarded wharf for flexible general industrial / storage or distribution floorspace (use classes B2/B8/E(g)(iii)) for waterborne cargo handling including ancillary office accommodation at ground and mezzanine levels; with residential dwellings (use class C3) and ancillary communal floorspace above; a cafe/restaurant on the upper courtyard (use class E(b)); a new Thames Path with associated lift/stair access; a new jetty; communal and private amenity space and landscaping; vehicular access and servicing facilities; car and cycle parking; plant and all associated ancillary and enabling works.	20/02/2024	Approved, unimplemented
Hurlingham Retail Park, 362 Wandsworth Bridge Road And 1 - 3 Carnwath Road London	2013/02870/FUL 2018/02354/VAR	Variation to Condition 2 (Approved Drawings) of planning permission 2013/02870/FUL granted 19 December 2014 (as amended by Non-Material Amendment 2019/03566/NMAT granted 16 December 2019); Redevelopment of the site to provide a residential-led, mixed use scheme comprising residential dwellings (C3); together with flexible retail / restaurant / public house / wine bar floorspace (use classes A1, A2, A3, A4); upgraded Thames Path; works of repair and alterations to the river wall; associated hard and soft landscaping, public and private open space, new public realm, pedestrian and cycle routes, vehicular access and servicing facilities, car parking and cycle parking. Amendments comprise removal of the basement (reduction in car parking from 213 to 116 spaces), provision of 506 cycle parking spaces, changes to the residential unit mix (resulting in an increase of 30 residential units to 269 units), increase in retail from 3,045 sqm (GIA) to 3,241.2 sqm (GIA), refinement of the massing in the north-west and north-east cores, detailed design of roof top plant, minor changes to the elevational treatment and associated non-material minor amendments.	01/12/2020	Under construction
>2.5km				
Land At The Former Hartopp Point And Lannoy	2022/01346/FR3	Redevelopment of the site comprising the erection of two buildings (split into Blocks A, B and C) ranging in height from 3 to 7	09/02/2023	Under construction

Point Aintree Estate Pellant Road London SW6 7NG		storeys to deliver 134 residential units (Class C3) together with associated parking, cycle parking, hard and soft landscaping, play space, access, utilities and other associated works, including demolition of the existing substation.		
Land Bounded By North End Road, Beaumont Avenue, West Cromwell Road, West London Railway Line, Lillie Road, Land Comprising The Empress State Building, Aisgill Avenue, The Former Gibbs Green School And Properties Fronting Dieppe Close.	2024/01942/COMB	Hybrid planning application, involving both outline and detailed proposals, for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed-use development above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures, comprising: Outline proposals for up to 373,000sqm GEA (gross external area) of mix use floorspace for residential use (Use Class C3) (up to 2,038 homes) and non-residential uses comprising hotel (Use Class C1), older persons housing (Use Class C2), office and/or research and development (Use Class E(g)), education (Use Class E(f)/F1), retail, food and beverage and other commercial uses (Use Class E(a)/(b)/(c)), leisure facilities (Use Class E(d)), cultural facilities (Use Class F1), storage and distribution (Use Class B8), community and social facilities (Use Class E(e)/(f)/F2) and sui generis uses (student accommodation and co-living, theatre, nightclub, car show room, drinking establishment (with or without expanded food provision), hot food takeaway, live music performance venue, cinema, concert hall, bingo hall and dance hall uses). Detailed proposals for four buildings (to comprise 92,517sqm GEA), ranging between 13 and 42 storeys in height (up to +112.4m AOD) for a mix of uses including: residential use (Use Class C3) to provide 462 homes (Use Class C3), student accommodation, delivering up to 696 rooms and non residential floorspace comprising: up to 3,072sqm GEA of retail, food & beverage or flexible commercial floorspace (Use Classes E(a)/(b)/(c)/sui generis); 2,045 sqm GEA leisure floorspace (Use Classes E(d) / sui generis) and 502 sqm GEA of community floorspace (Use Classes E(e)/(f)/(g) / F),		*Pending consideration*

		together with ancillary floorspace.		

Site Allocations	
Reference	**Key Details**
Strategic Policy: South Fulham Riverside Regeneration Area (SFRRA)	The council will work with landowners and other partners to secure the phased regeneration of the area to become a high quality residential area together with a mix of other uses.

APPENDIX 4: AVRS PRODUCED BY MILLER HARE

LOTS ROAD SOUTH

Lots Road north - winter - Existing
7294_0381 version 250616

Lots Road north - winter - Proposed
7294_0385 version 250701

Lots Road north - winter - Proposed+Consented
7294_0386 version 250701

Lots Road adjacent to Westfield Park - winter - Existing
7294_0411 version 250228

Lots Road adjacent to Westfield Park - winter - Proposed
7294_0415 version 250616

Lots Road adjacent to Westfield Park - winter - Proposed+Consented
7294_0416 version 250616

Lots Road at junction with Pooles Lane - Existing
7294_0191 version 240619

Lots Road at junction with Pooles Lane - Proposed
7294_0195 version 250701

Lots Road at junction with Pooles Lane - Proposed+Consented
7294_0196 version 250701

Burnaby Street west at junction with Lots Road - Existing
7294_0181 version 250616

Burnaby Street west at junction with Lots Road - Proposed
7294_0185 version 250701

Burnaby Street west at junction with Lots Road - Proposed+Consented
7294_0186 version 250701

Lots Road at junction with Upcerne Road - Existing
7294_0121 version 240619

Lots Road at junction with Upcerne Road - Proposed
7294_0125 version 250701

Lots Road at junction with Upcerne Road - Proposed+Consented
7294_0126 version 250701

Lots Road at Chelsea Harbour Drive - Existing
7294_0171 version 250616

Lots Road at Chelsea Harbour Drive - Proposed
7294_0175 version 250701

Lots Road at Chelsea Harbour Drive - Proposed+Consented
7294_0176 version 250701

Harbour Yard at creek edge - Existing
7294_0111 version 240619

Harbour Yard at creek edge - Proposed
7294_0115 version 250701

Harbour Yard at creek edge - Proposed+Consented
7294_0116 version 250701

Burnaby Street near Ashburnham Road - winter - Existing
7294_0441 version 250616

Burnaby Street near Ashburnham Road - winter - Proposed
7294_0445 version 250616

Burnaby Street near Ashburnham Road - winter - Proposed+Consented
7294_0446 version 250616

Burnaby Street at junction with Upcerne Road - winter - Existing
7294_0391 version 250616

Burnaby Street at junction with Upcerne Road - winter - Proposed
7294_0395 version 250701

Burnaby Street at junction with Upcerne Road - winter - Proposed+Consented
7294_0396 version 250701

Stadium Street - winter - Existing
7294_0431 version 250616

Stadium Street - winter - Proposed
7294_0435 version 250701

Stadium Street - winter - Proposed+Consented
7294_0436 version 250701

Ashburnham Road at junction with Stadium Street - Existing
7294_0271 version 250616

Ashburnham Road at junction with Stadium Street - Proposed
7294_0275 version 250613

Ashburnham Road at junction with Stadium Street - Proposed+Consented
7294_0276 version 250616

Brompton Cemetery - Existing
7294_0481 version 250324

Brompton Cemetery - Proposed
7294_0485 version 250616

Brompton Cemetery - Proposed+Consented
7294_0486 version 250616

Brompton Cemetery within arcades - Existing
7294_0461 version 250324

Brompton Cemetery within arcades - Proposed
7294_0465 version 250616

Brompton Cemetery within arcades - Proposed+Consented
7294_0466 version 250616

King s Road at Rewell Street - winter - Existing
7294_0421 version 250616

King⊠s Road at Rewell Street - winter - Proposed
7294_0425 version 250616

King⊠s Road at Rewell Street - winter - Proposed+Consented
7294_0426 version 250616

Gwyn Close - Existing
7294_0221 version 250616

Gwyn Close - Proposed
7294_0225 version 250616

Gwyn Close - Proposed+Consented
7294_0226 version 250616

Sands End Lane - Existing
7294_0371 version 240619

Sands End Lane - Proposed
7294_0375 version 250616

Sands End Lane - Proposed+Consented
7294_0376 version 250616

Open space near Station Court - Existing
7294_0231 version 240619

Open space near Station Court - Proposed
7294_0235 version 250701

Open space near Station Court - Proposed+Consented
7294_0236 version 250701

Imperial Wharf overground station, on western platform looking north-west - Exis
7294_0361 version 240619

Imperial Wharf overground station, on western platform looking north-west - Prop
7294_0365 version 250701

Imperial Wharf overground station, on western platform looking north-west - Prop
7294_0366 version 250701

Battersea Bridge Road (south) - Existing
7294_0251 version 250616

Battersea Bridge Road (south) - Proposed
7294_0255 version 250616

Battersea Bridge Road (south) - Proposed+Consented
7294_0256 version 250616

Westfield Park - winter - Existing
7294_0401 version 250616

Westfield Park - winter - Proposed
7294_0405 version 250616

Westfield Park - winter - Proposed+Consented
7294_0406 version 250616

Battersea Bridge (north) - Existing
7294_0301 version 250616

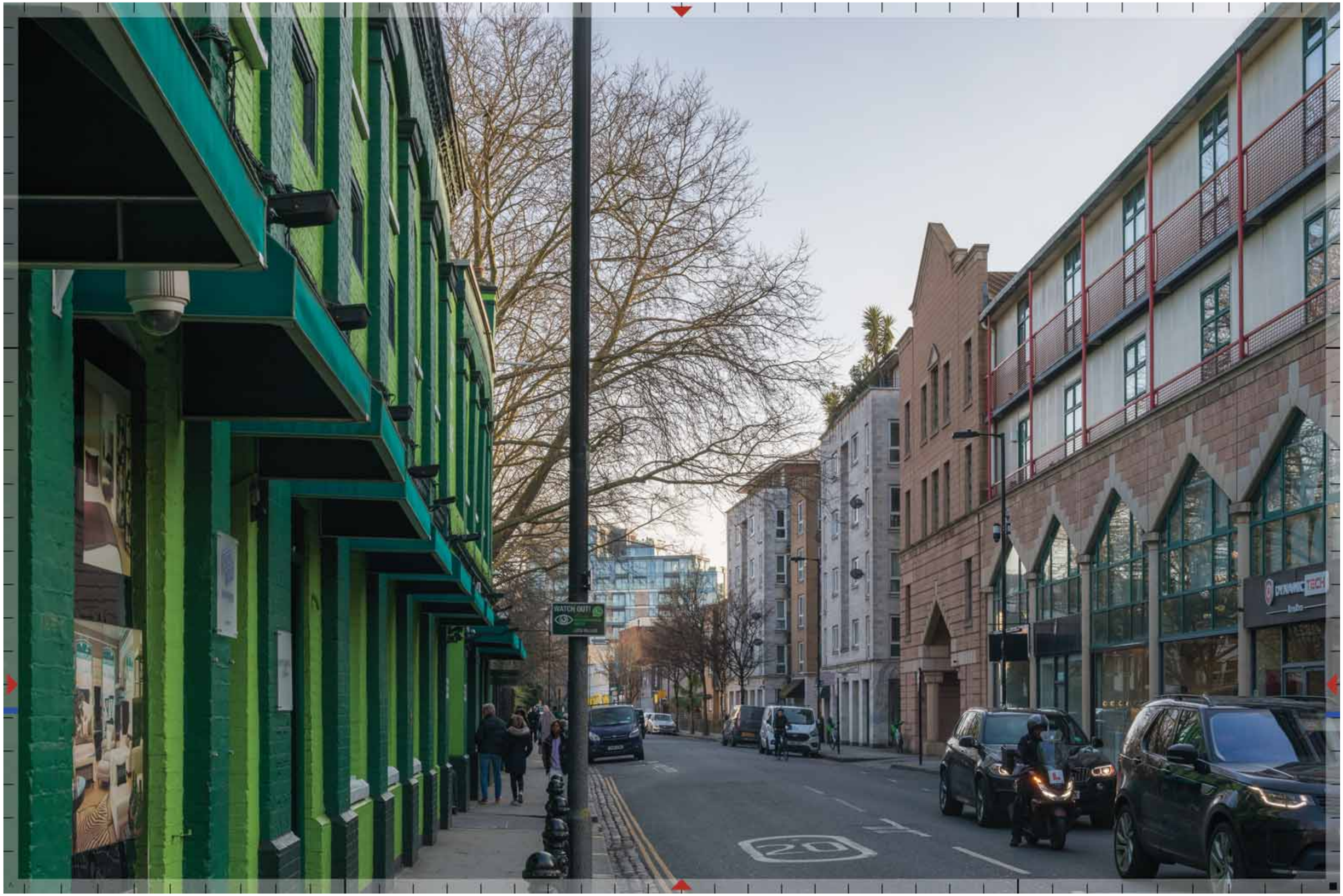
Battersea Bridge (north) - Proposed
7294_0305 version 250616

Battersea Bridge (north) - Proposed+Consented
7294_0306 version 250616

St Mary☒s Battersea - Existing
7294_0291 version 250616

St Mary☒s Battersea - Proposed
7294_0295 version 250616

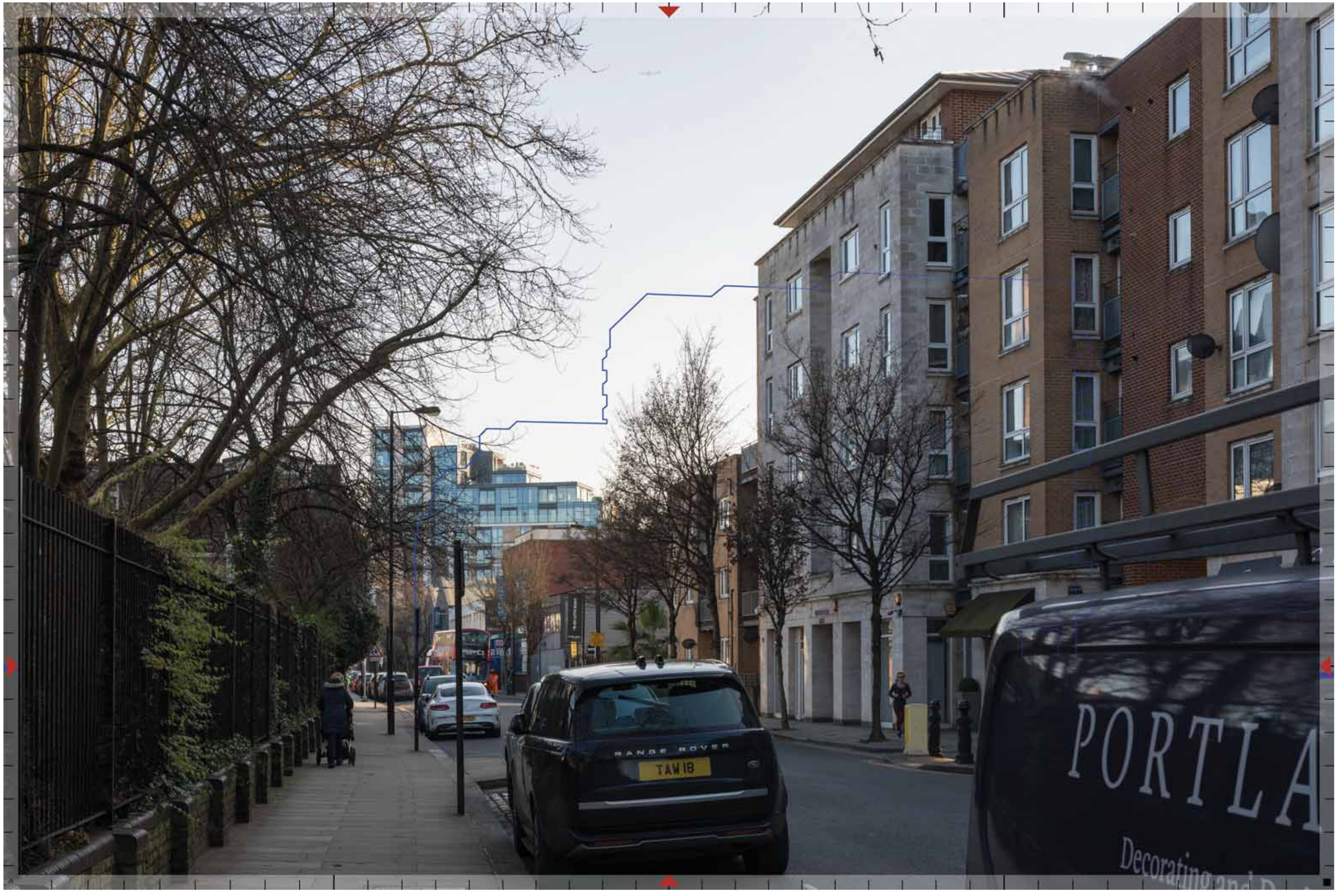
St Mary☒s Battersea - Proposed+Consented
7294_0296 version 250616

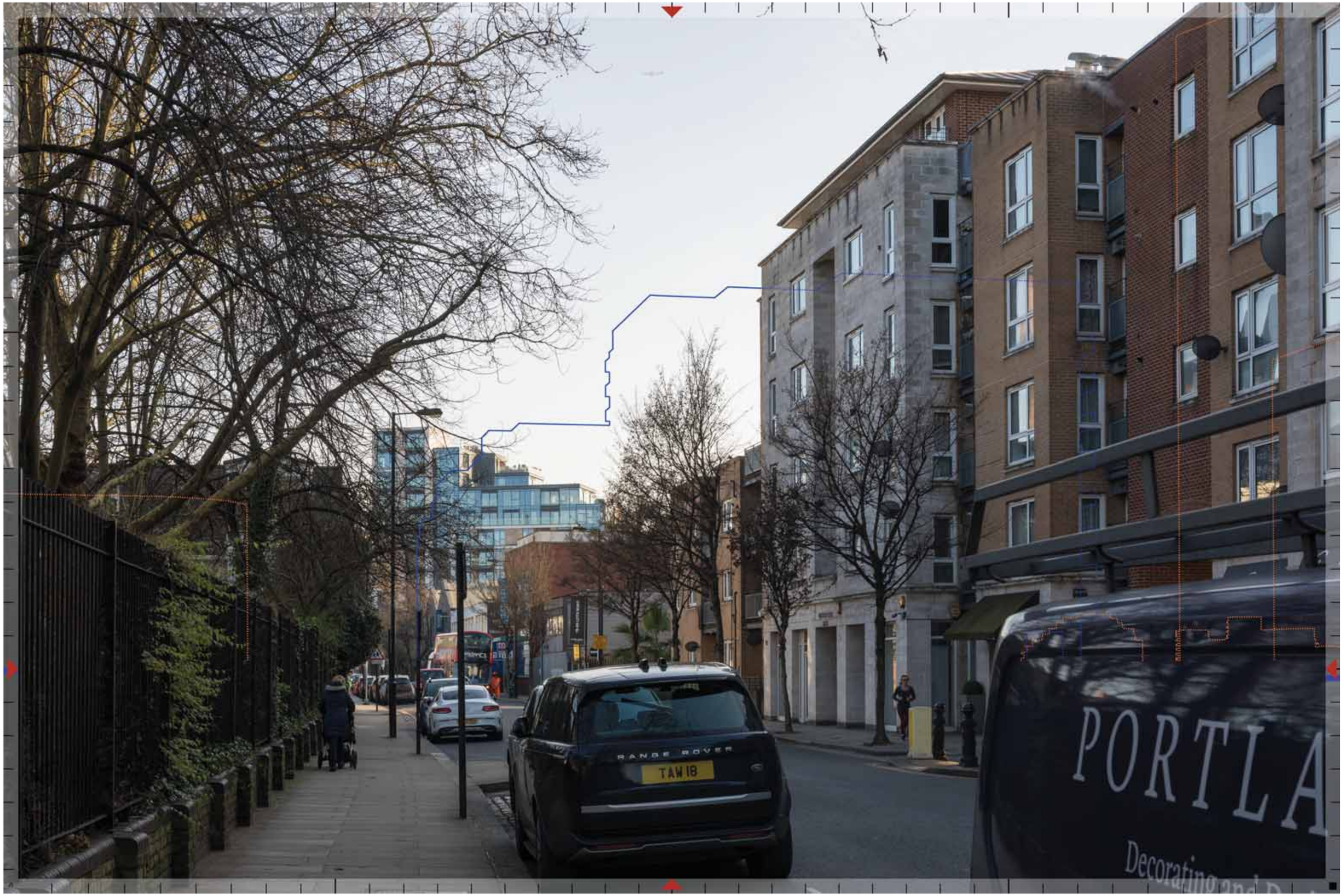

WATCH OUT!
20

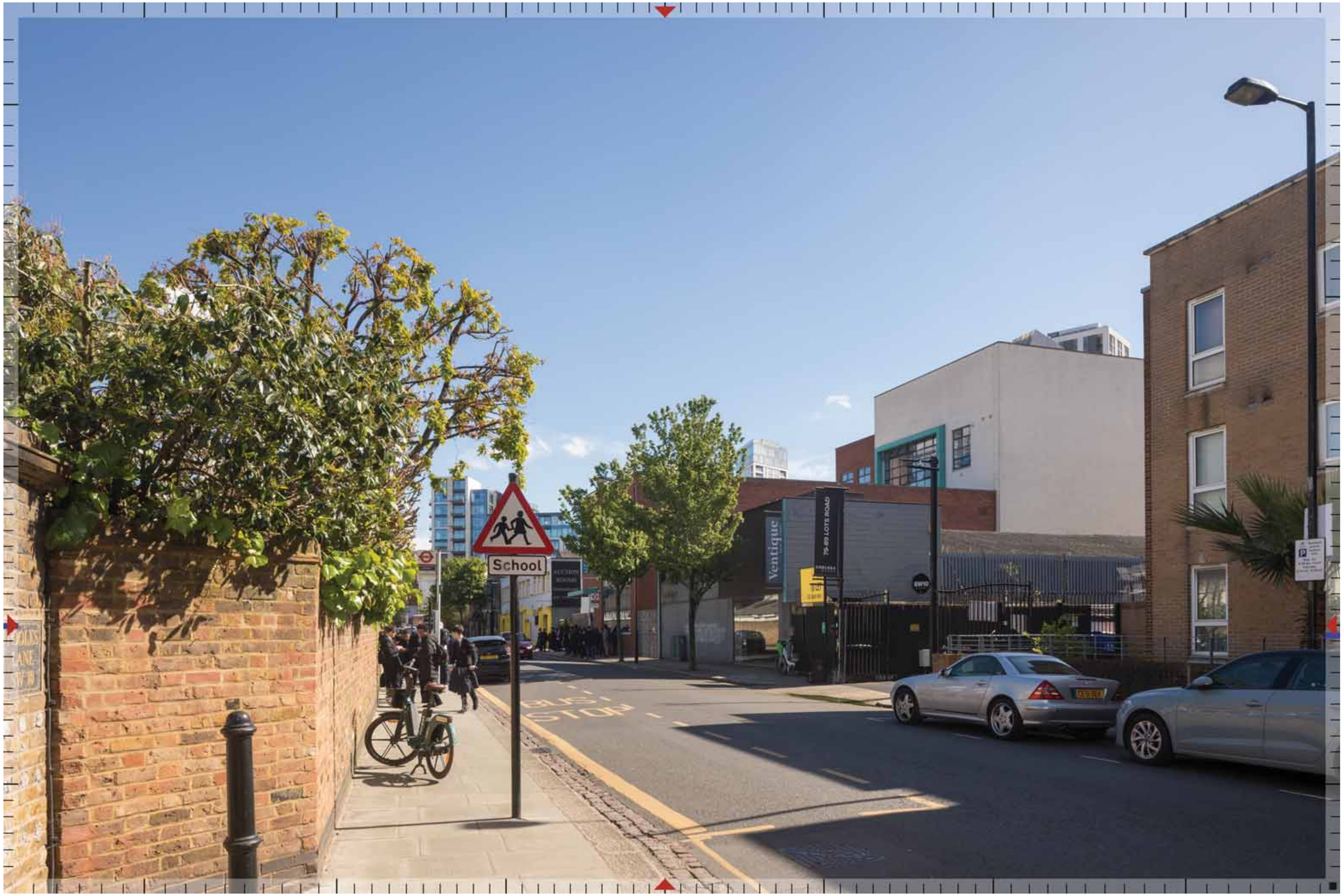

WATCH OUT!
20


WATCH OUT!
20


RANGE ROVER
TAW 18
PORTLA
Decorating

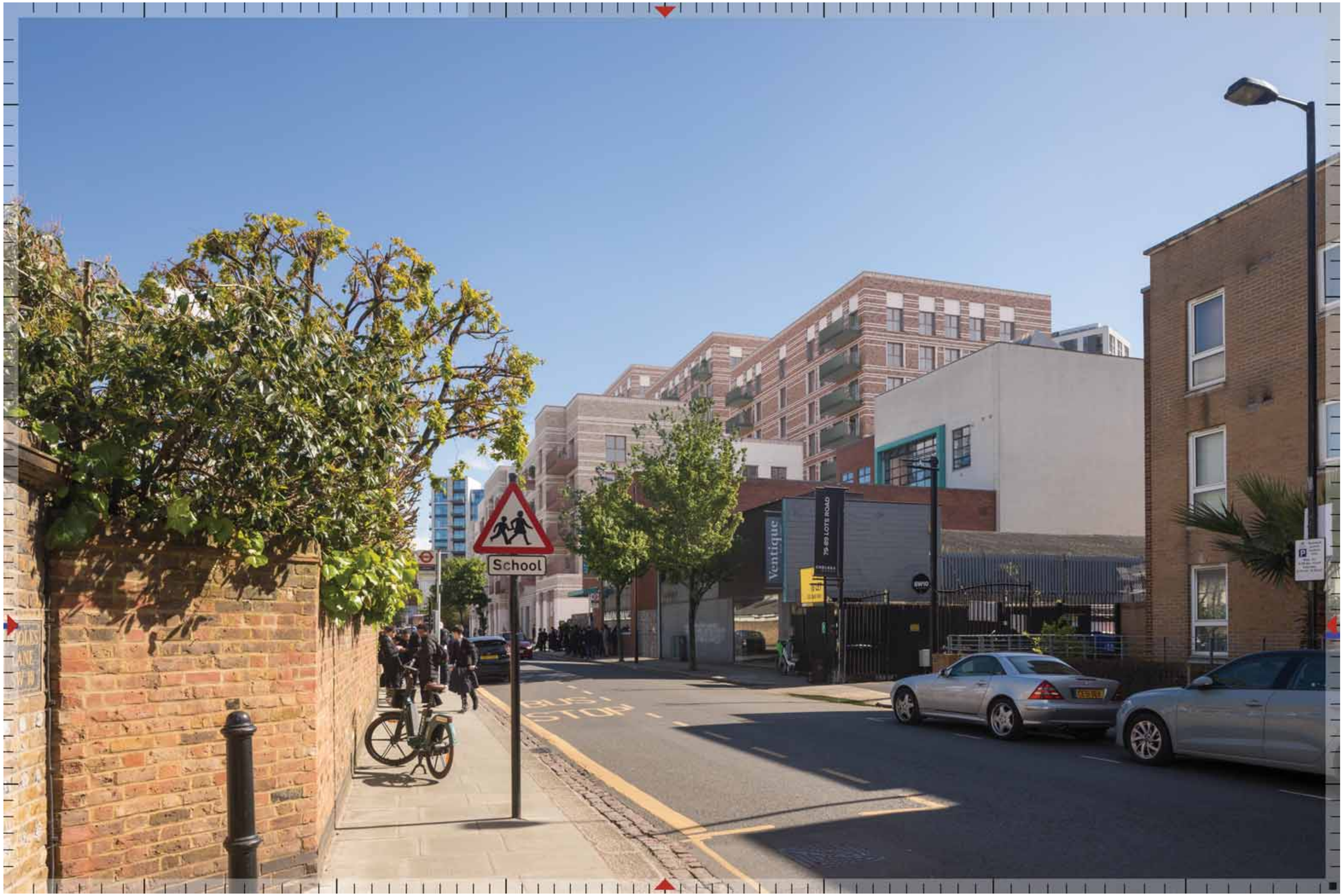

RANGE ROVER
TAW 18
PORTLA
Decorating

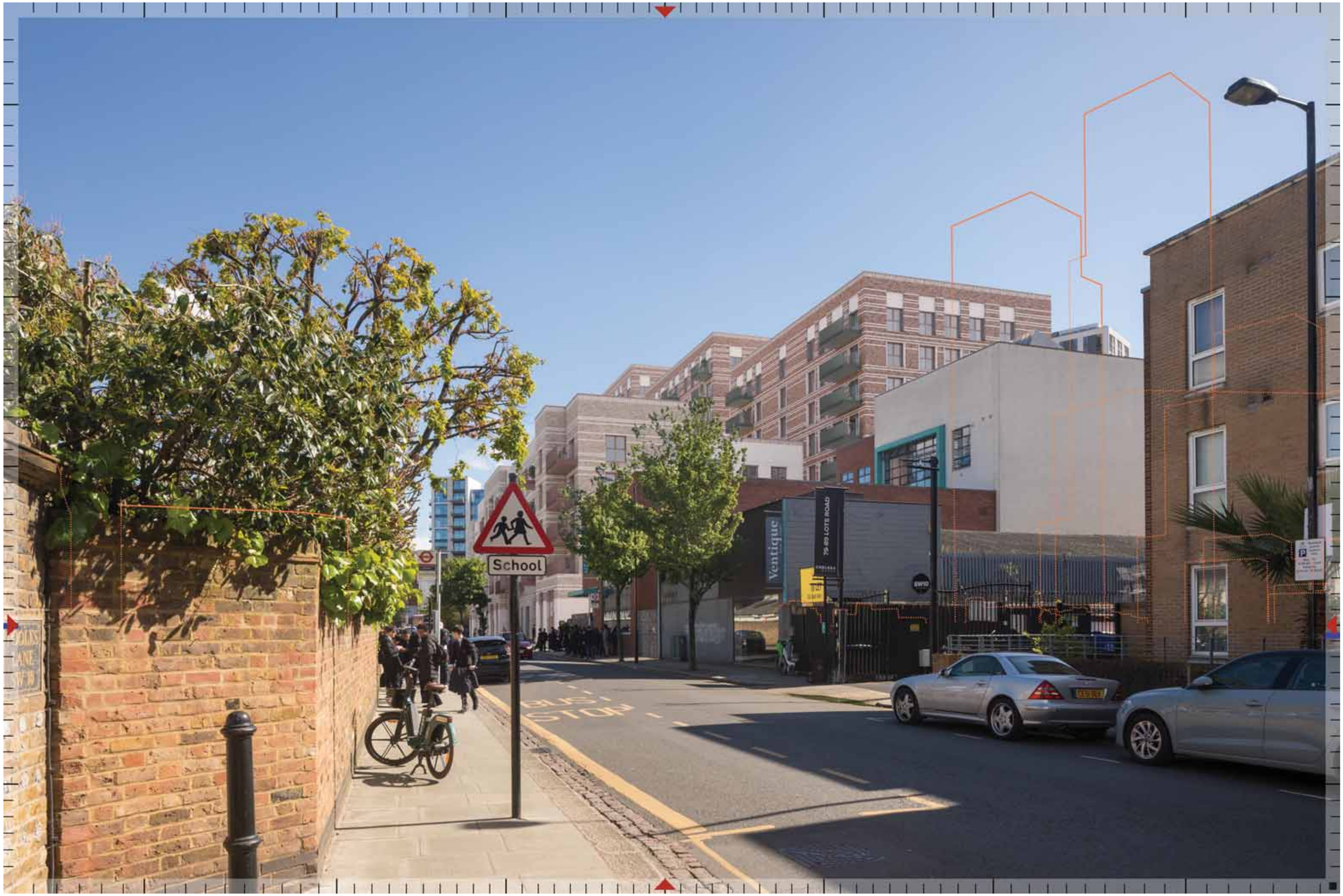

RANGE ROVER
TAW 18
PORTLA
Decorating



7294_0191 version 240619
Lots Road South, London SW10 [planning] | Lots Road at junction with Pooles Lane - Existing

millerhare


School
Ventique
75-89 LOTS ROAD
BUS STOP

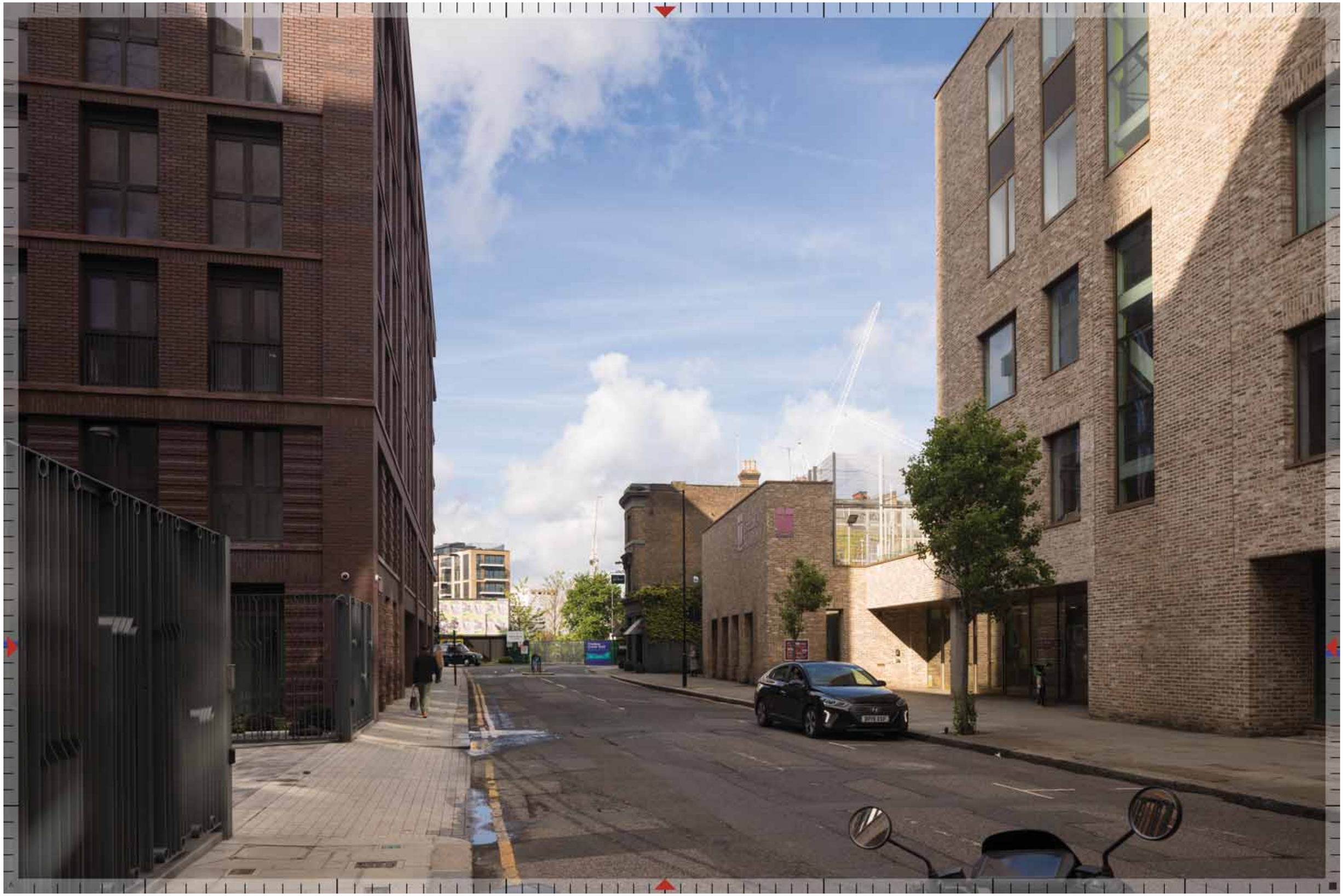

School
Ventique
75-89 LOTS ROAD
BUS STOP

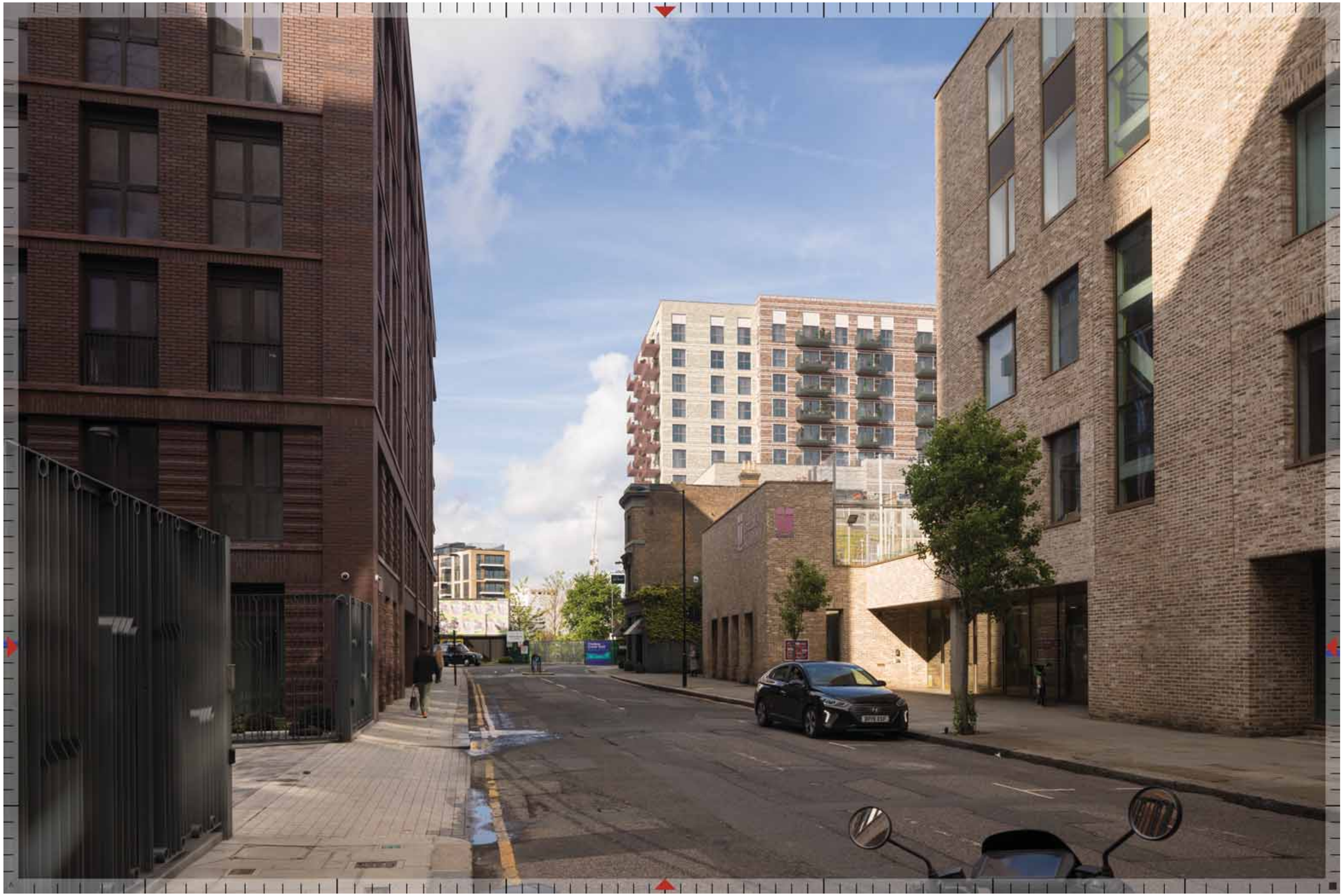

ZONE
LOTS ROAD AUCTIONS
71

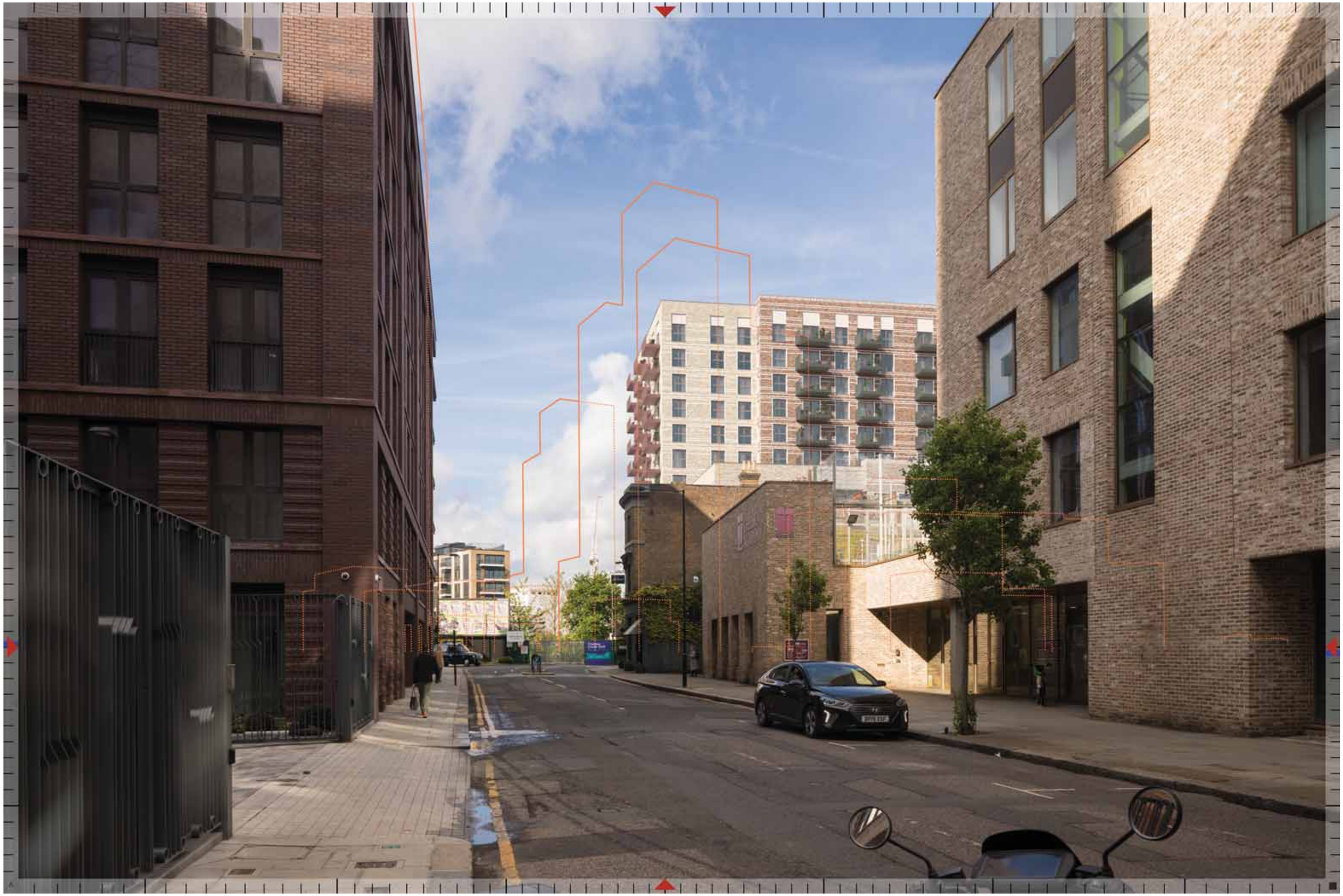

ZONE

7294_0186 version 250701
Lots Road South, London SW10 [planning] I Burnaby Street west at junction with Lots Road - Proposed+Consented

millerhare








Vehicle Pound
Chelsea
Creek Wall
Repair Works
20
Lots Road


Lots Road
20


Lots Road
20


OFFICES TO LET

7294_0115 version 250701
Lots Road South, London SW10 [planning] | Harbour Yard at creek edge - Proposed

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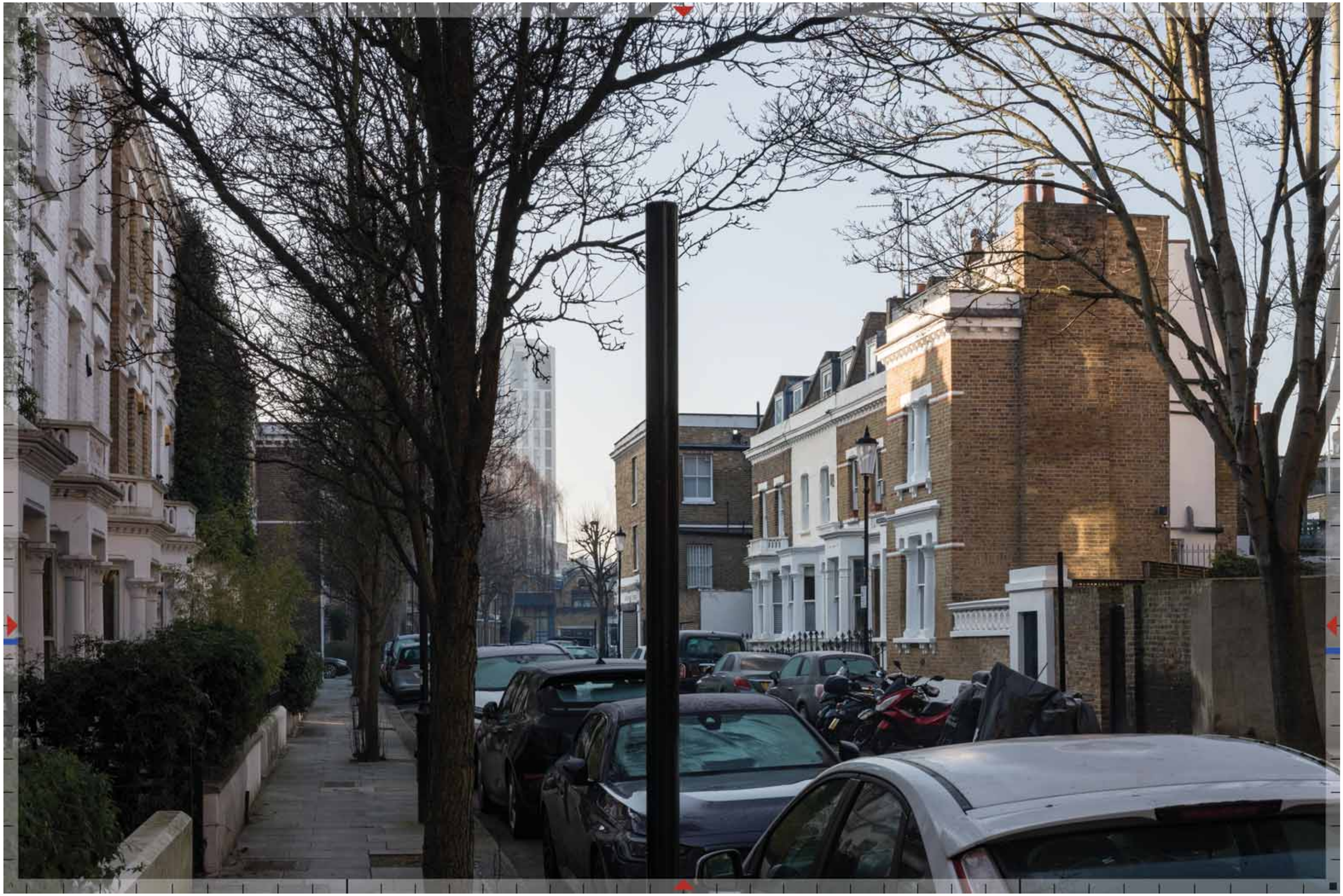
7294_0116 version 250701
Lots Road South, London SW10 [planning] | Harbour Yard at creek edge - Proposed+Consented

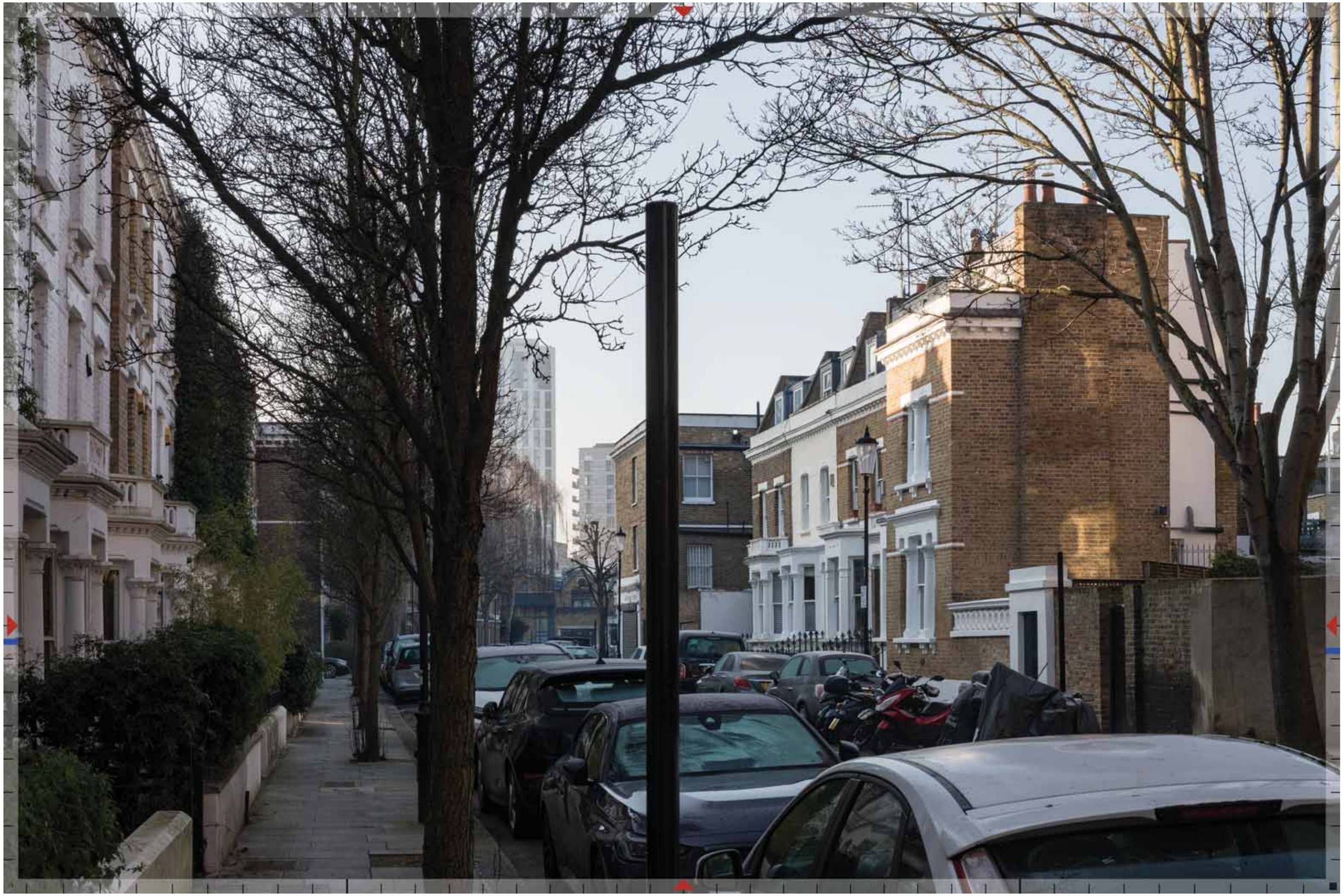
millerhare

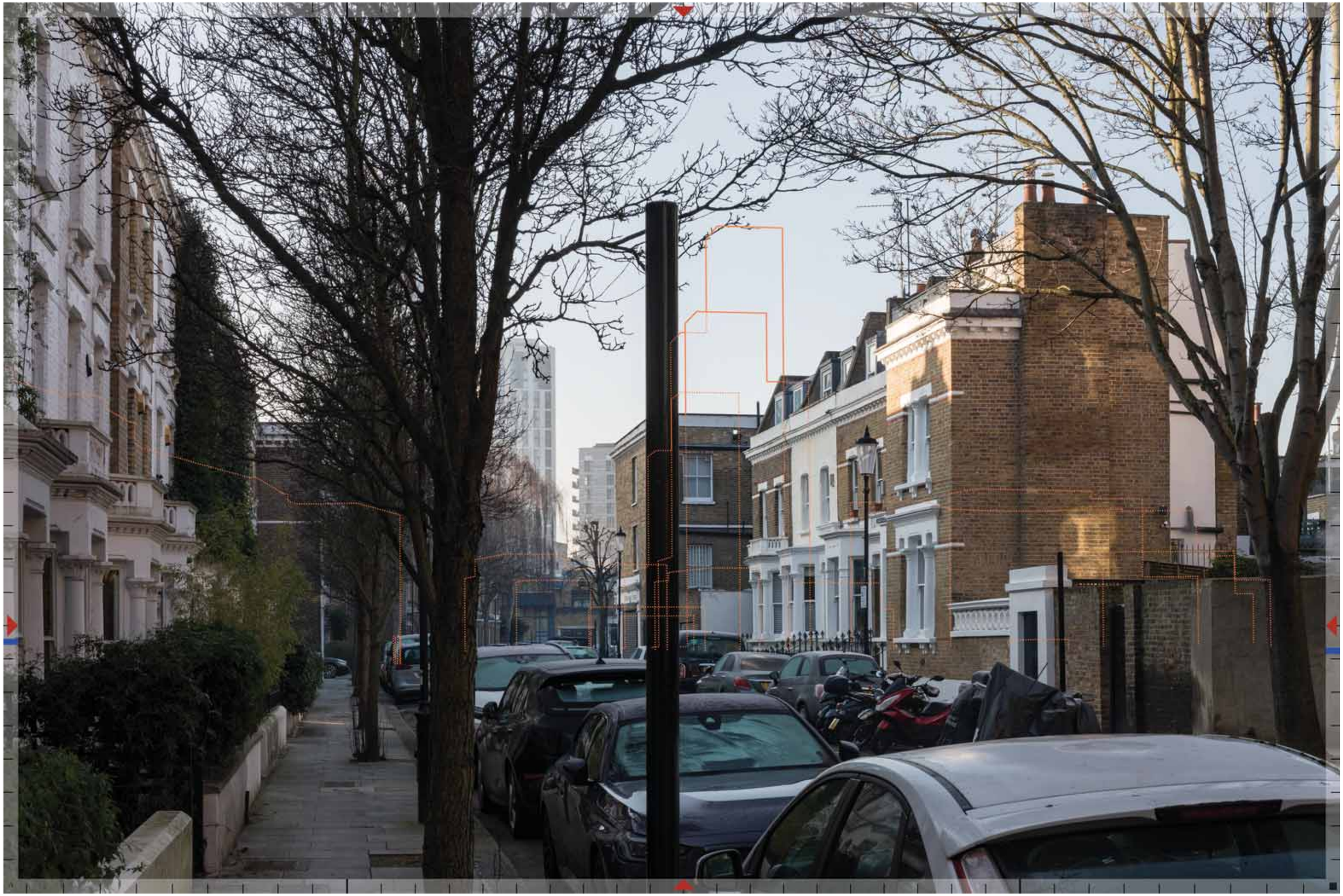

Dexters
DG13 PCZ
LM69 LCV


Dexters
DGI3 PCZ
LM69 LCV


Dexters
DG13 PCZ
LM69 LCV





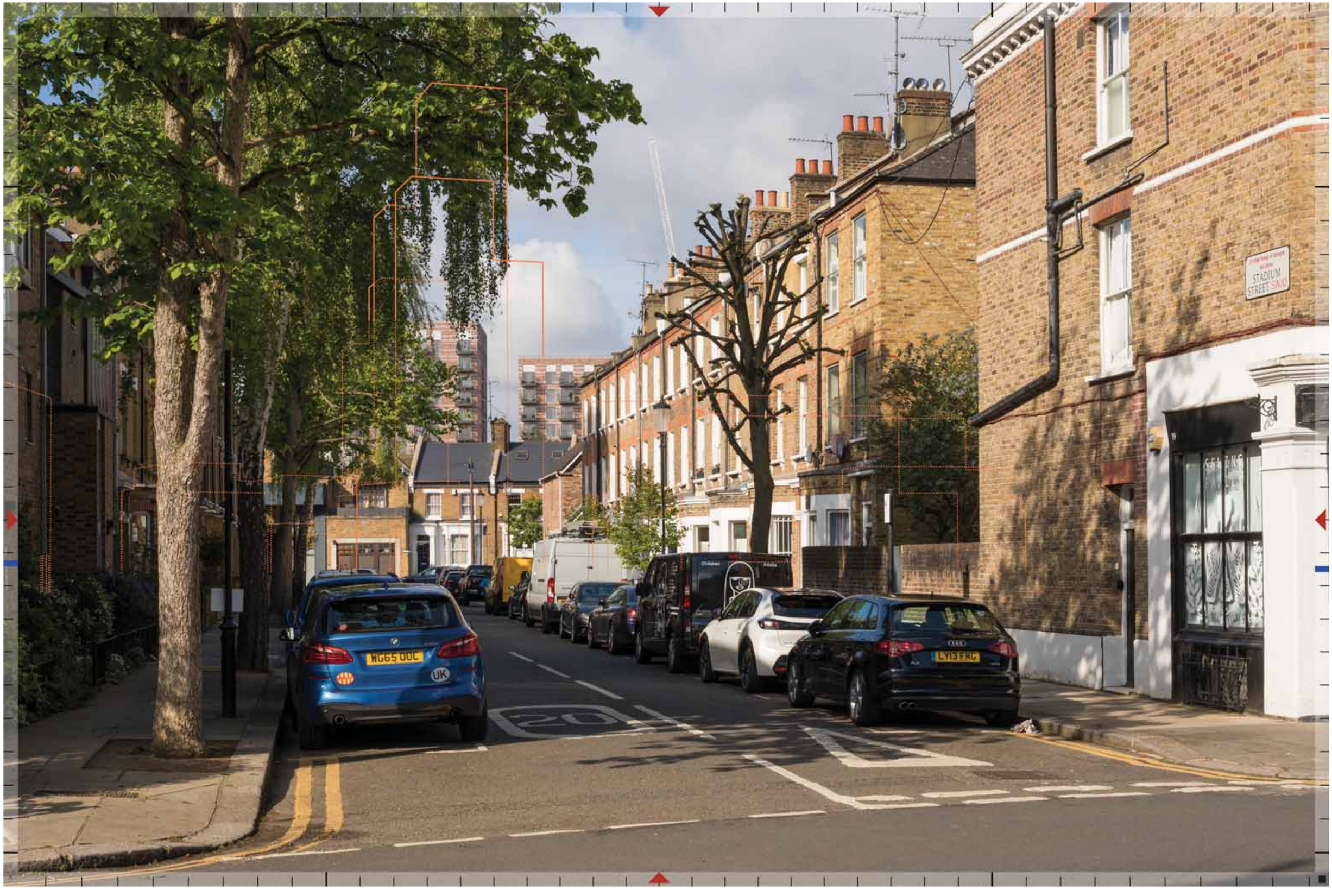


7294_0271 version 250616
Lots Road South, London SW10 [planning] | Ashburnham Road at junction with Stadium Street - Existing

millerhare

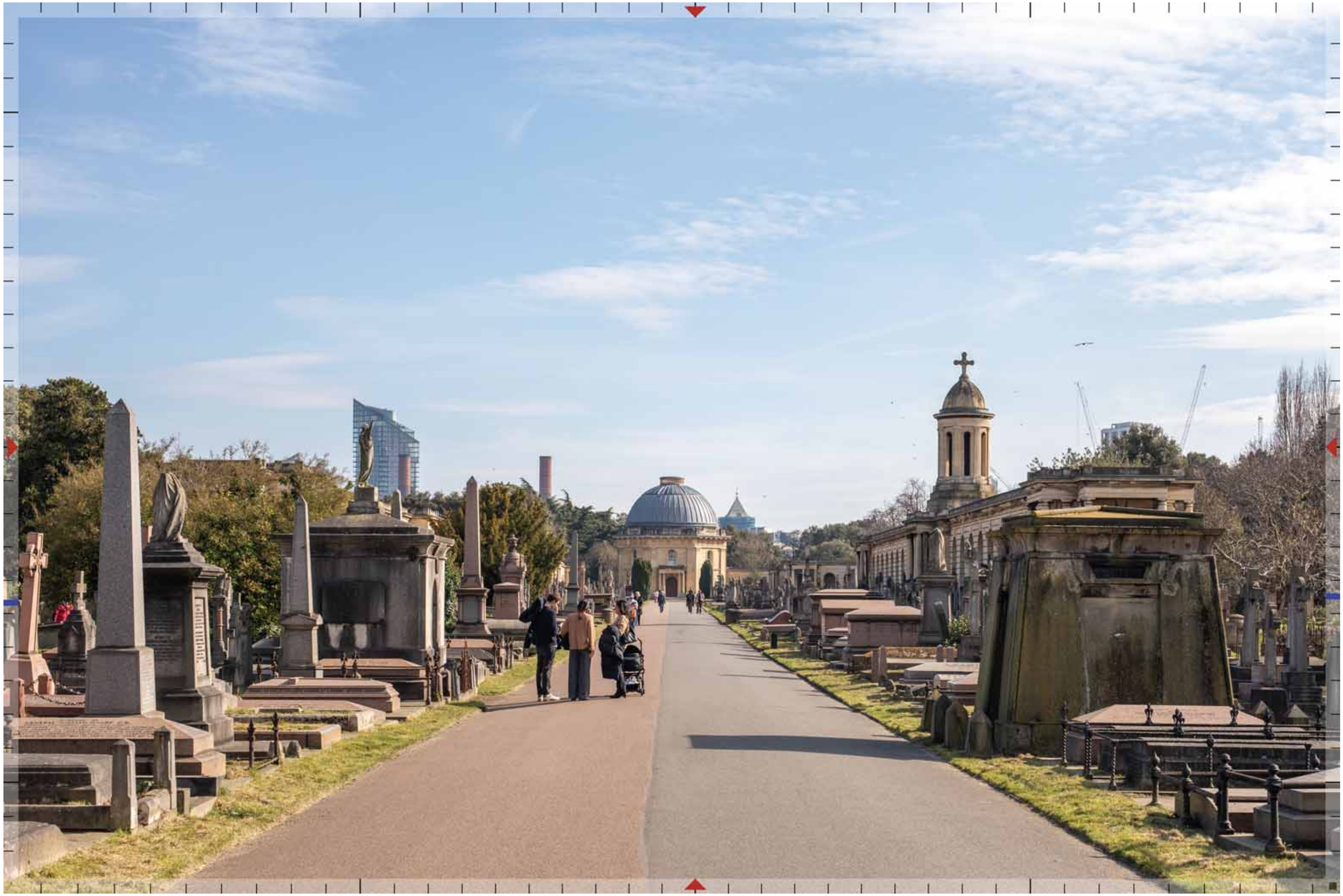
7294_0275 version 250613
Lots Road South, London SW10 [planning] | Ashburnham Road at junction with Stadium Street - Proposed

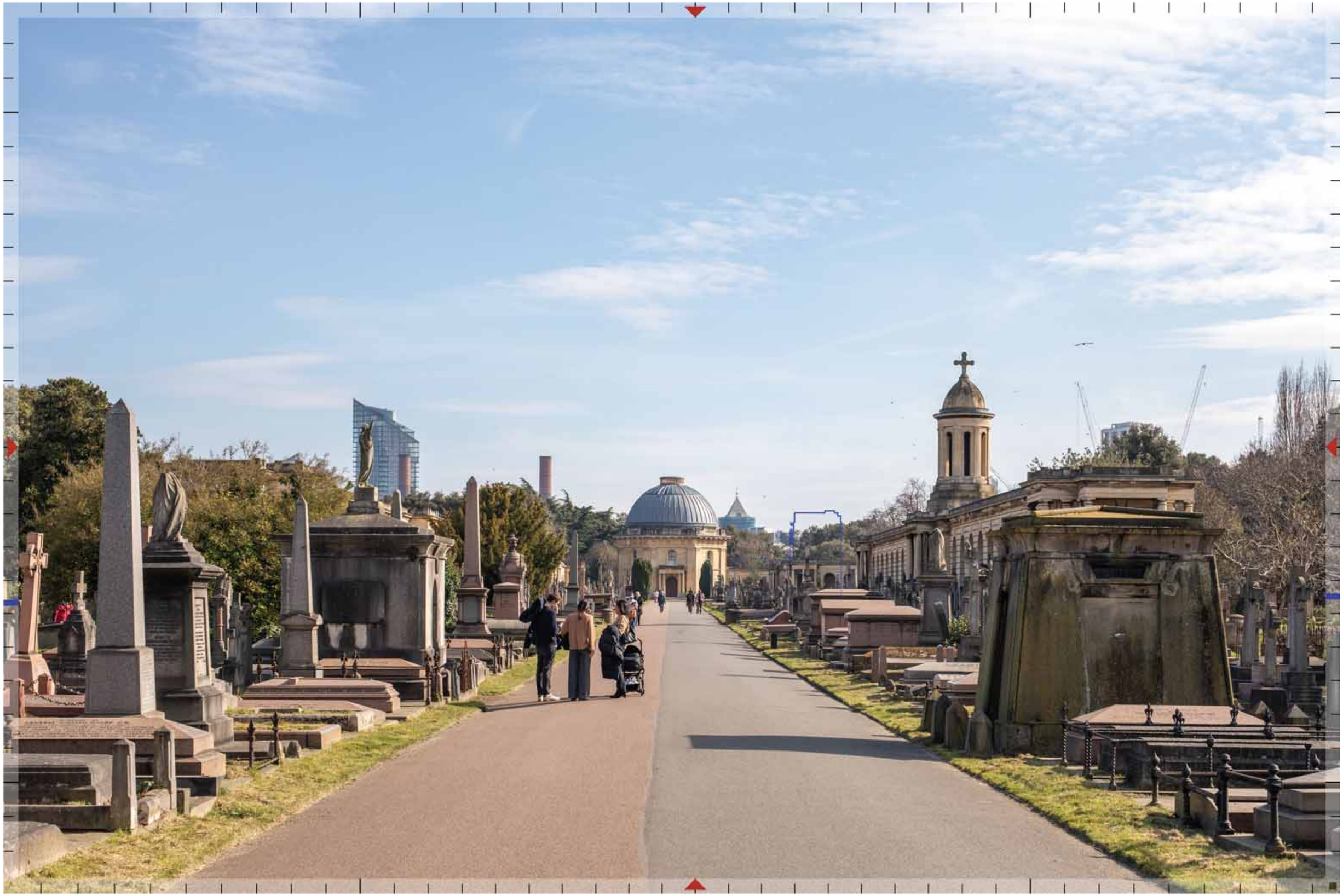
millerhare

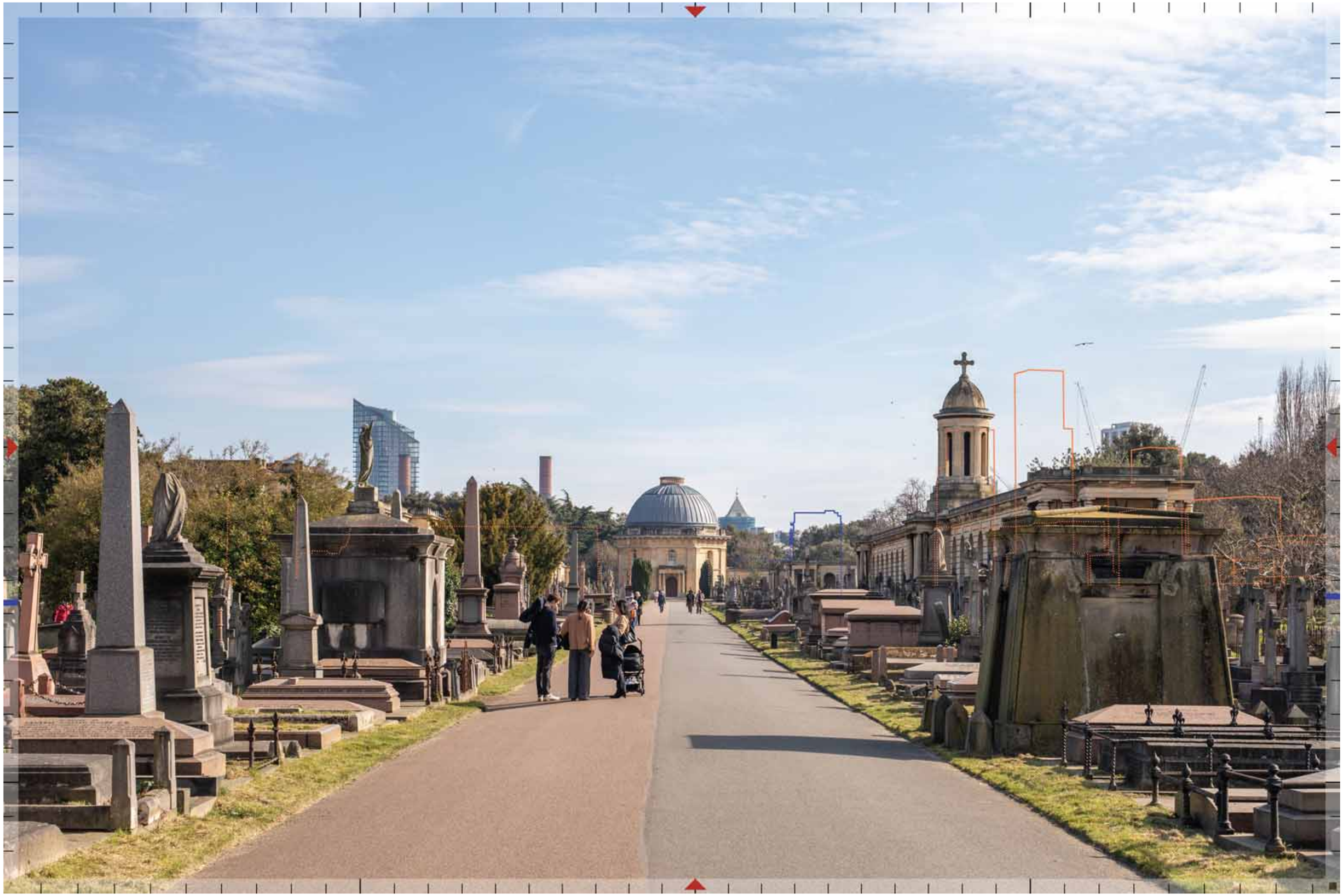


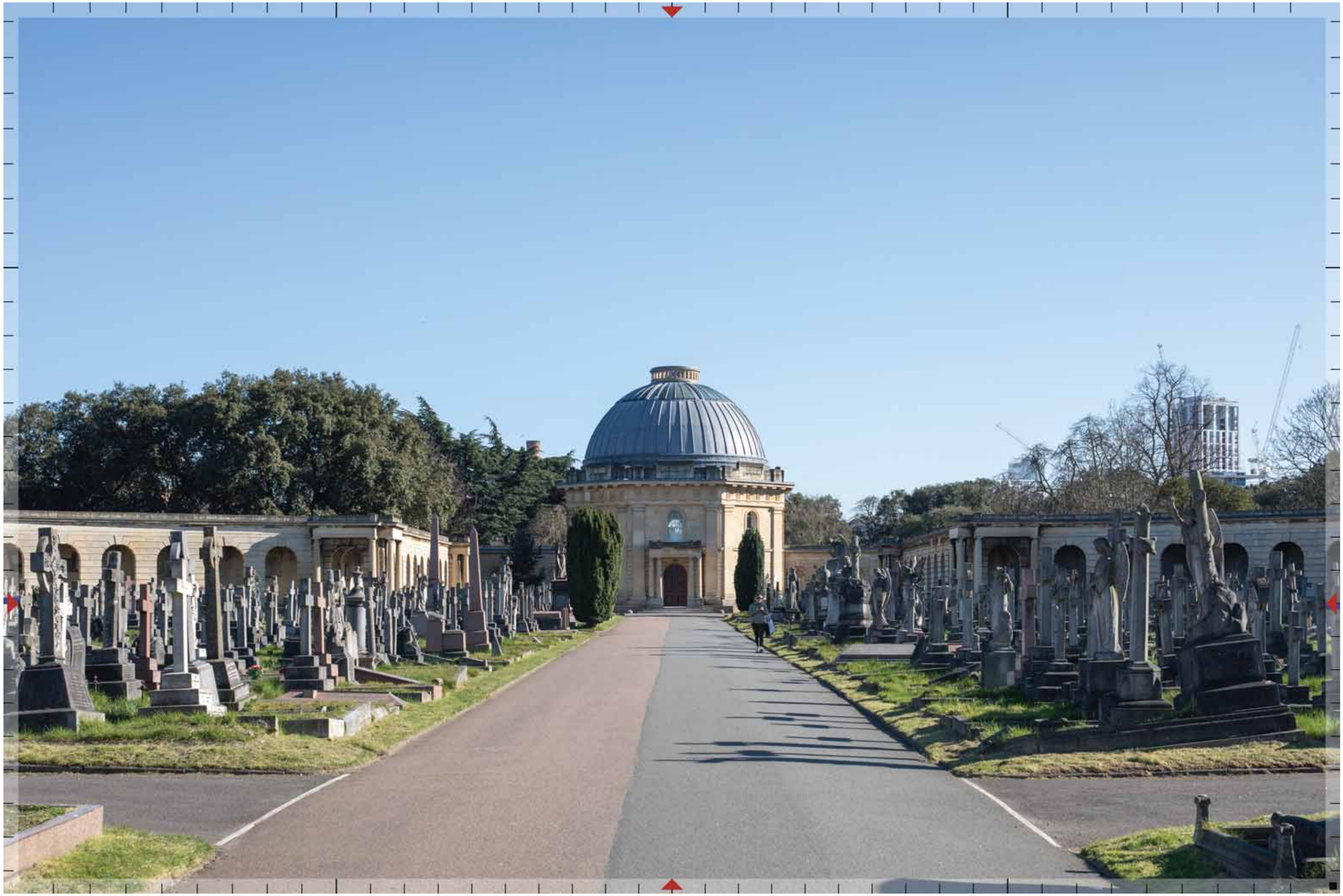
7294_0276 version 250616
Lots Road South, London SW10 [planning] | Ashburnham Road at junction with Stadium Street - Proposed+Consented

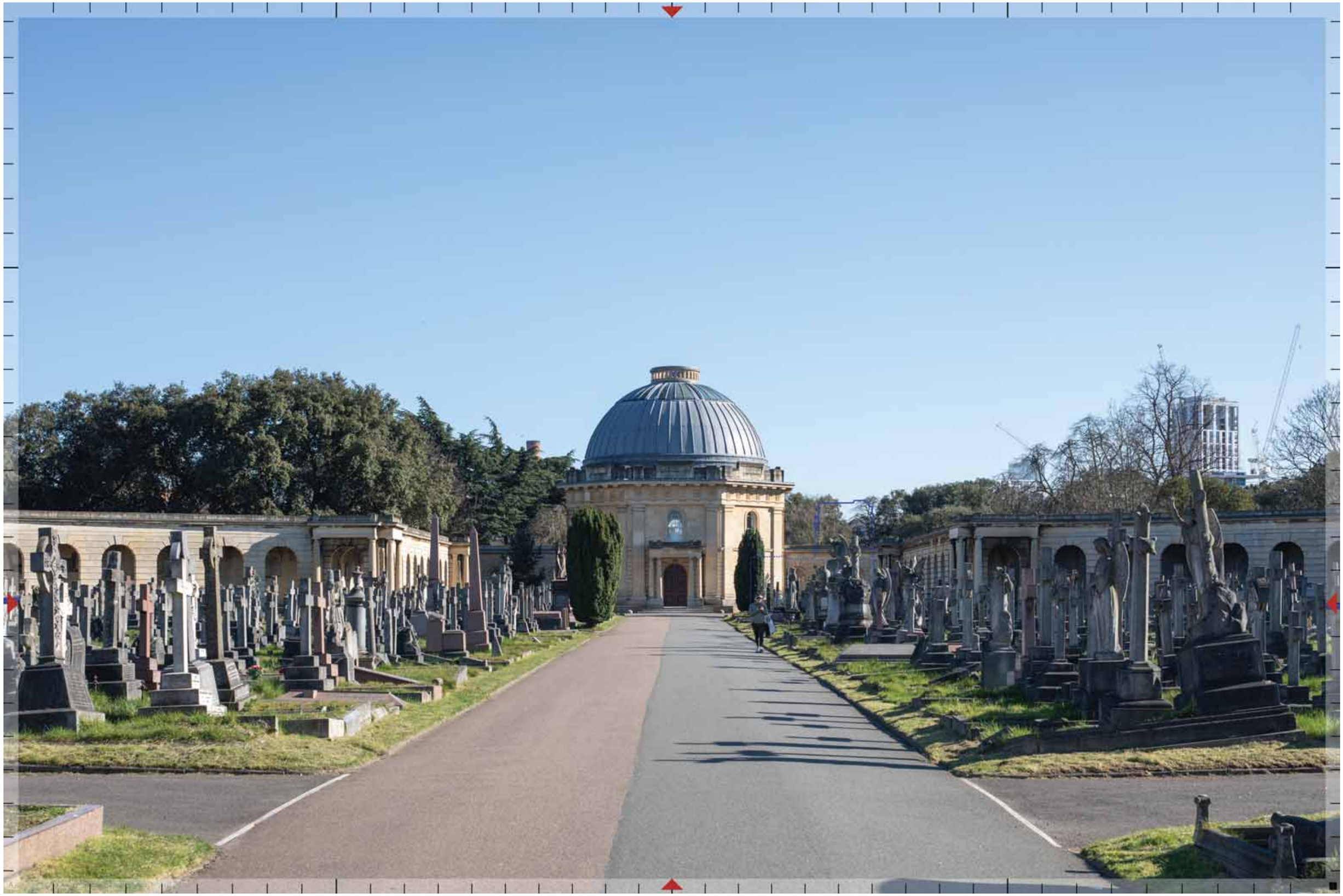
millerhare











7294_0465 version 250616
Lots Road South, London SW10 [planning] | Brompton Cemetery ☒ within arcades - Proposed

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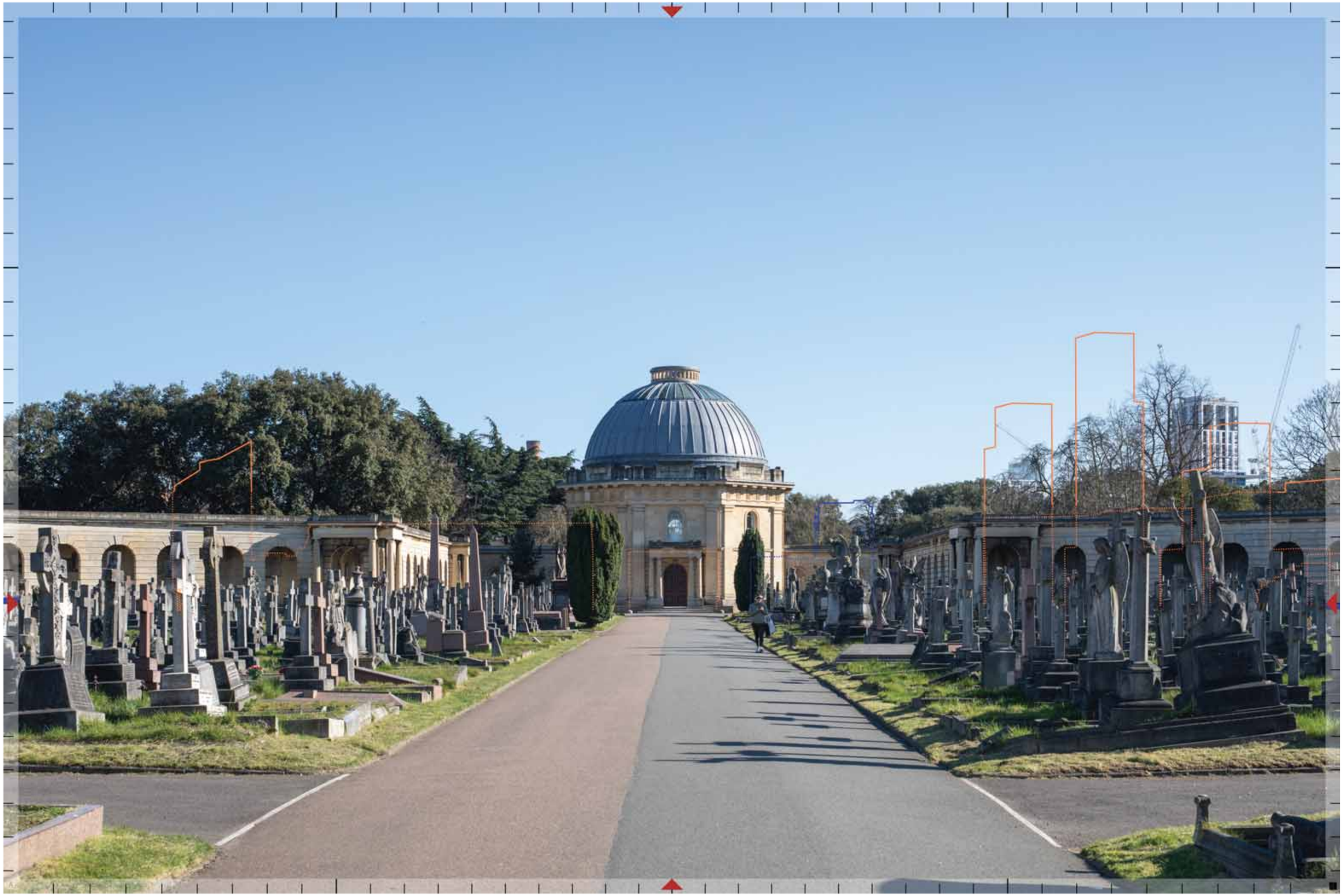
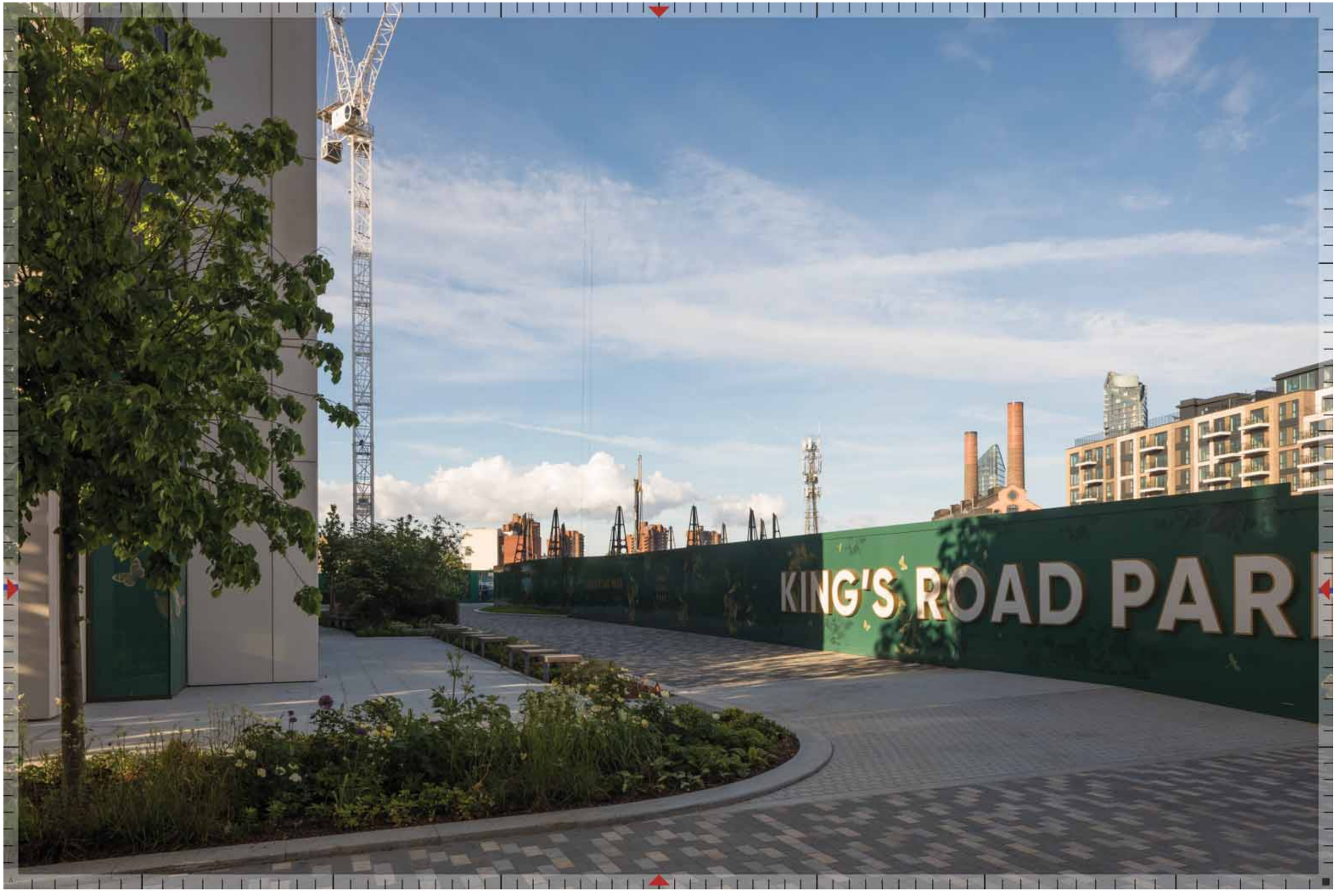
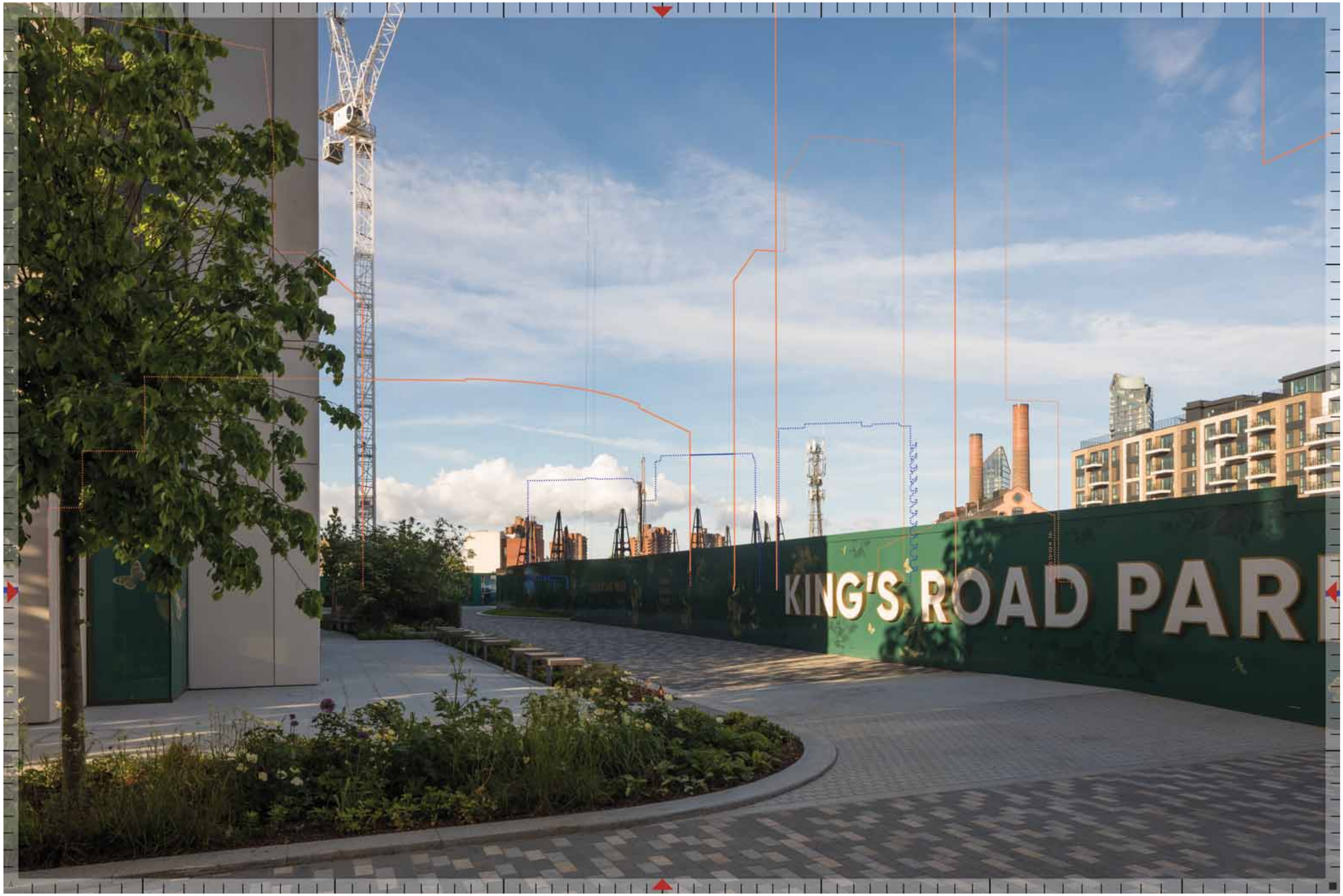


7294_0466 version 250616
Lots Road South, London SW10 [planning] I Brompton Cemetery ⊠ within arcades - Proposed+Consented

millerhare


KING'S ROAD PAR


KING'S ROAD PAR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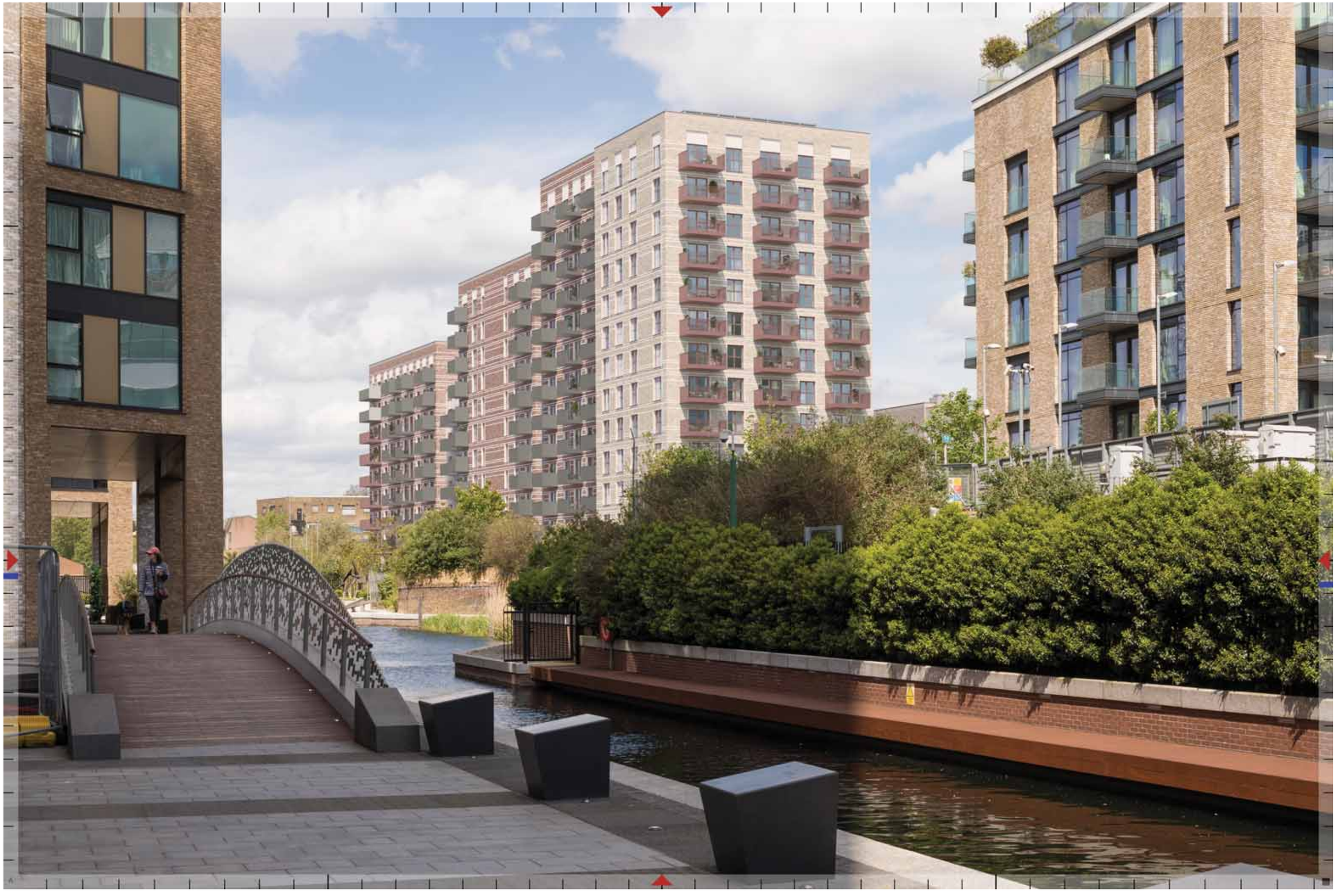

7294_0236 version 250701
Lots Road South, London SW10 [planning] I Open space near Station Court - Proposed+Consented

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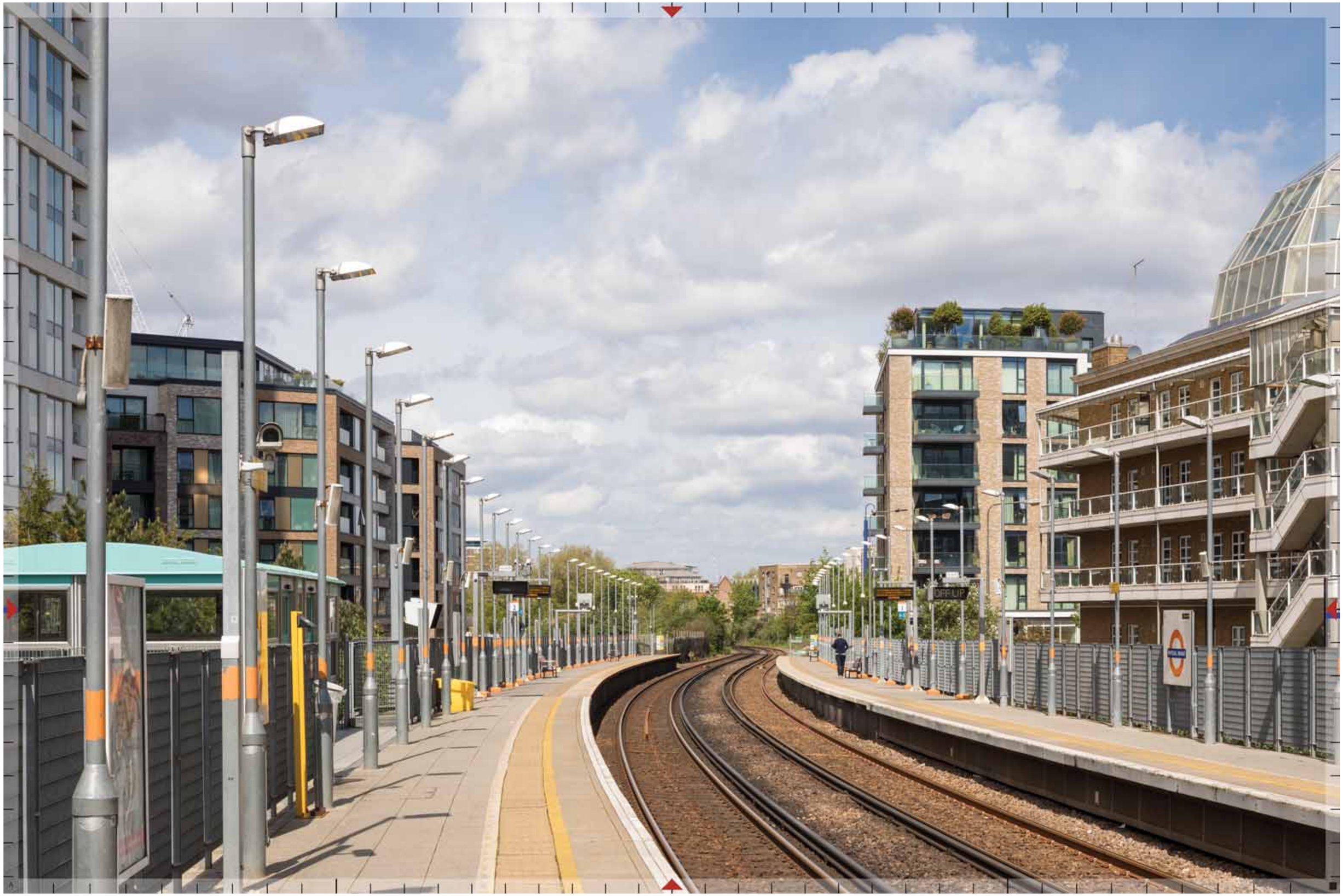

7294_0361 version 240619
Lots Road South, London SW10 [planning] I Imperial Wharf overground station, on western platform looking north-west - Existing

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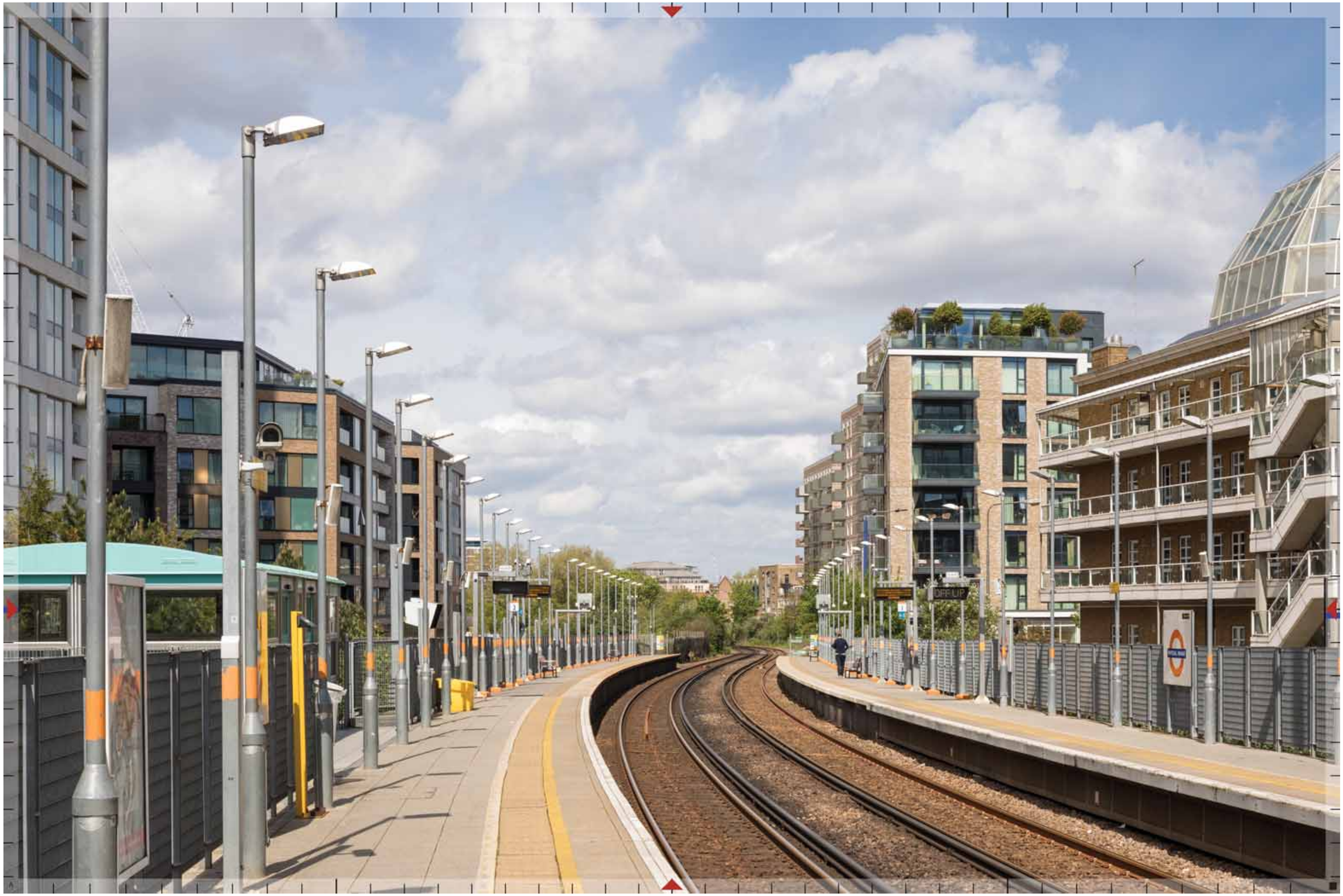

7294_0365 version 250701
Lots Road South, London SW10 [planning] | Imperial Wharf overground station, on western platform looking north-west - Proposed

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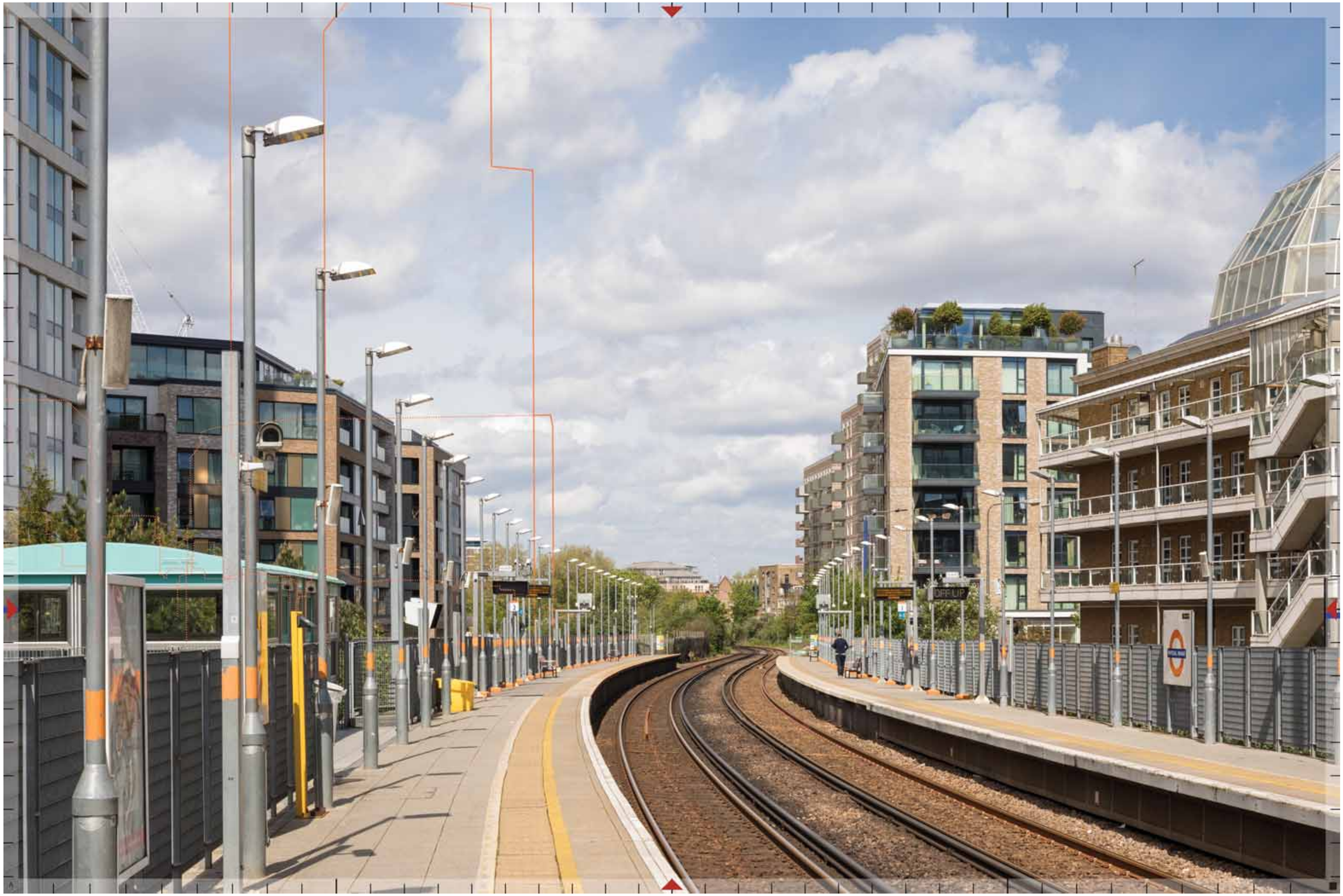

7294_0366 version 250701
Lots Road South, London SW10 [planning] I Imperial Wharf overground station, on western platform looking north-west - Proposed+Consented

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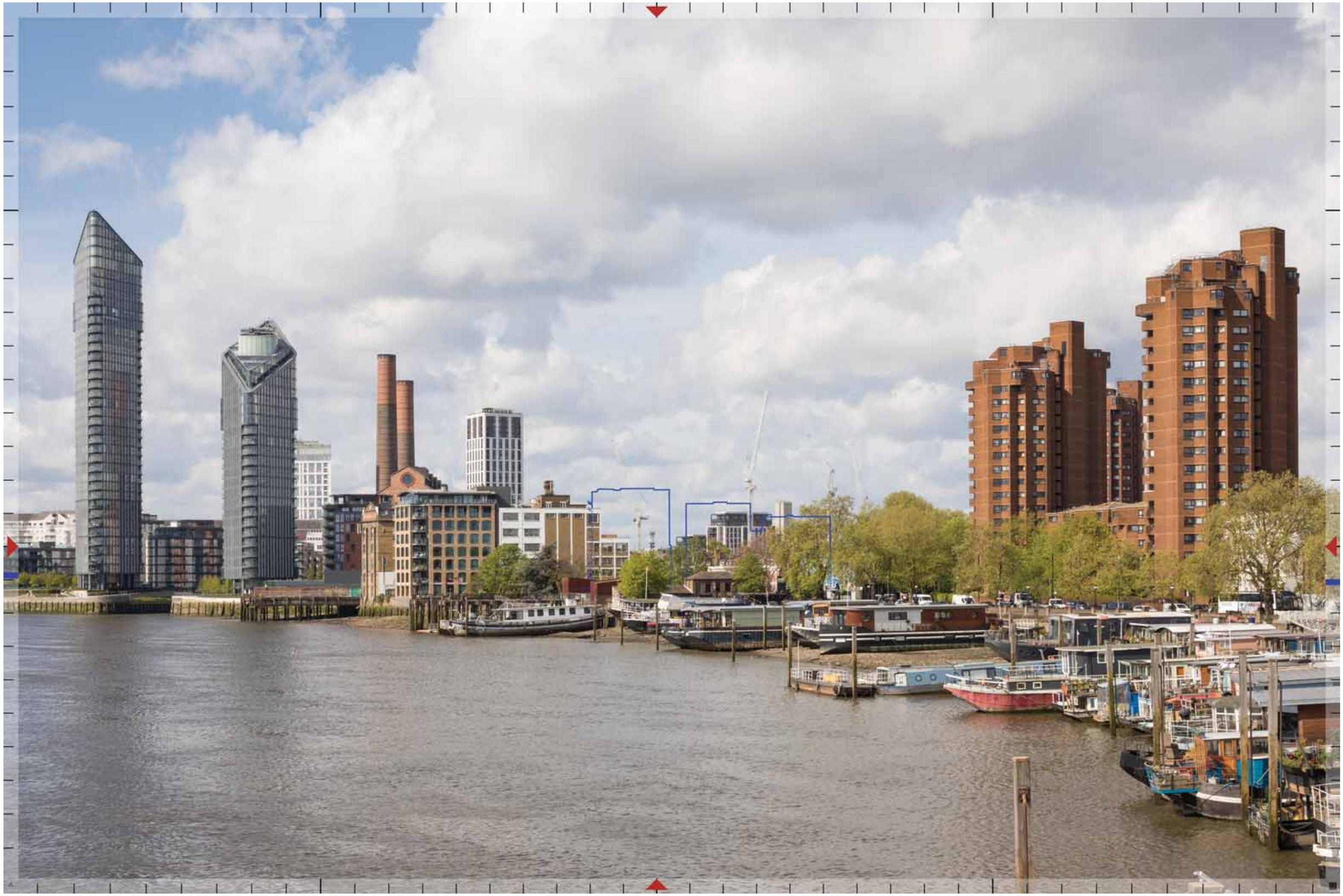

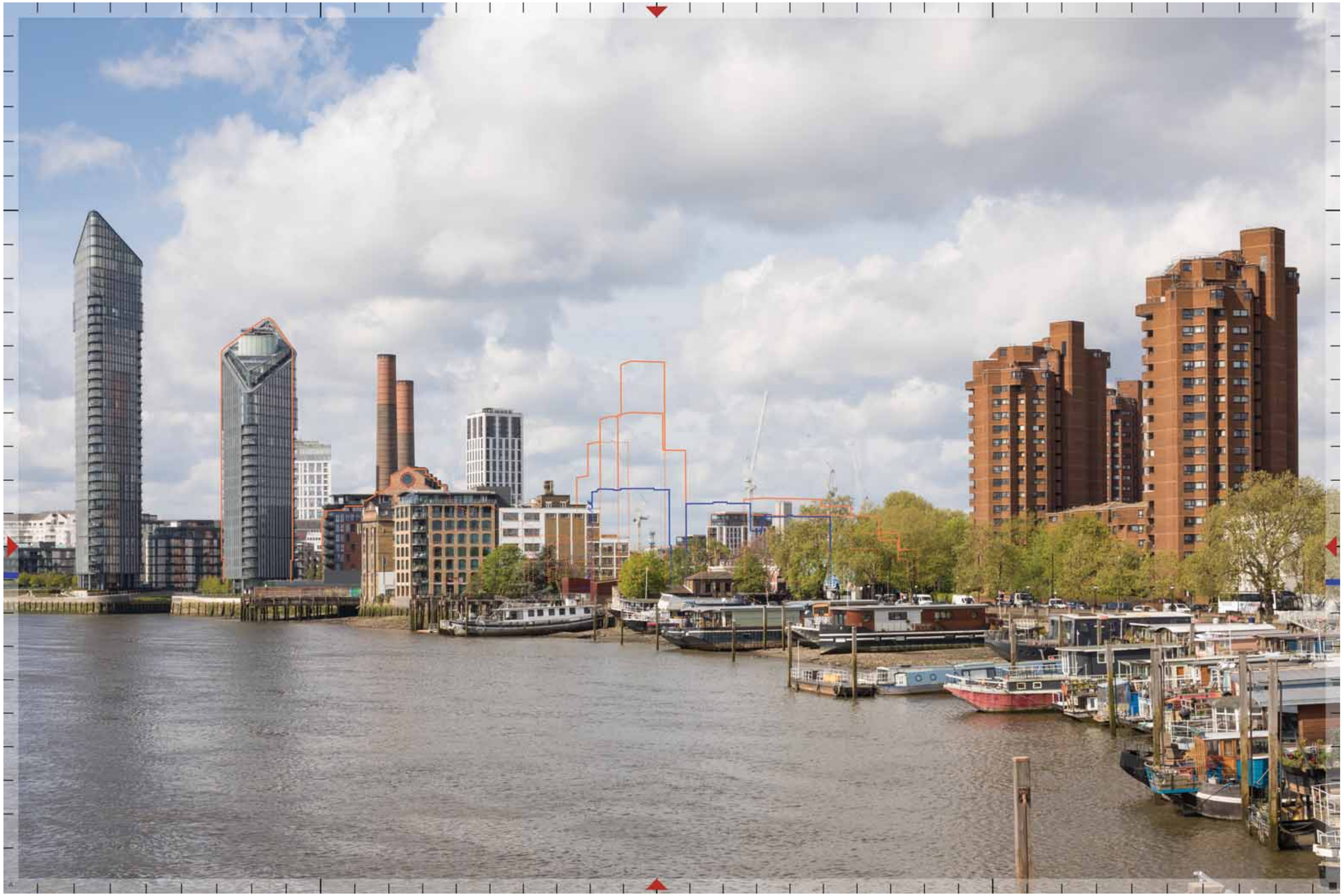

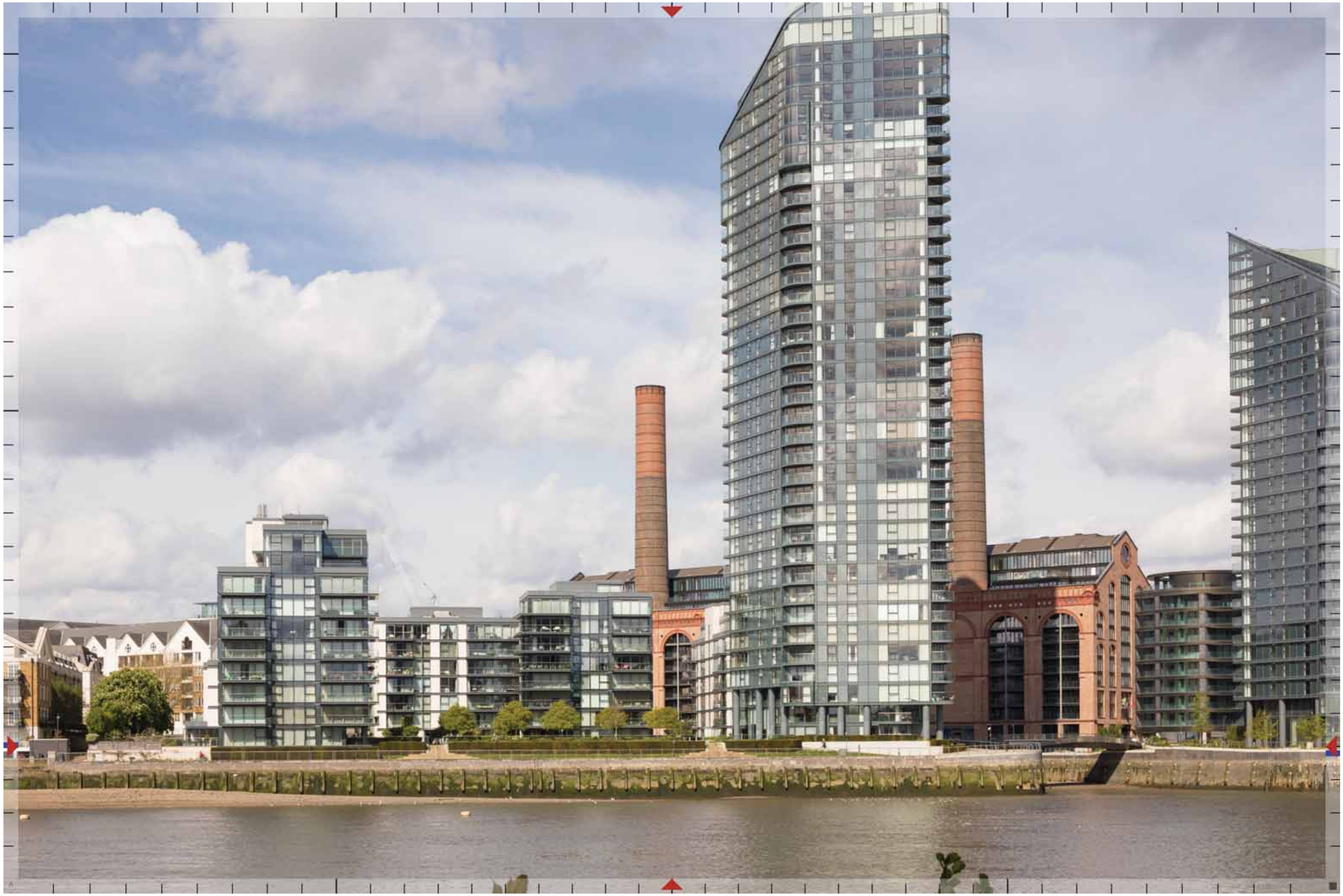

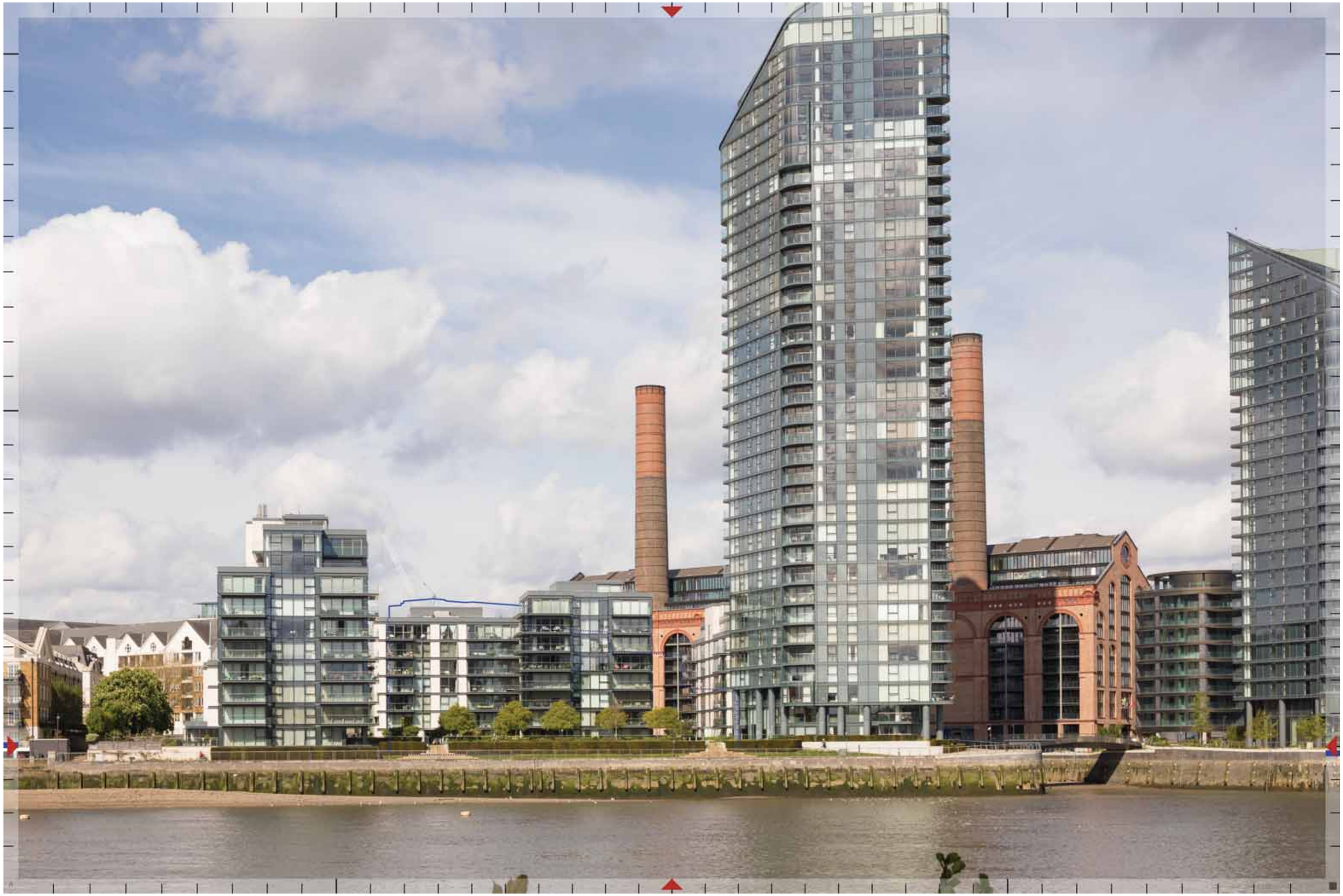

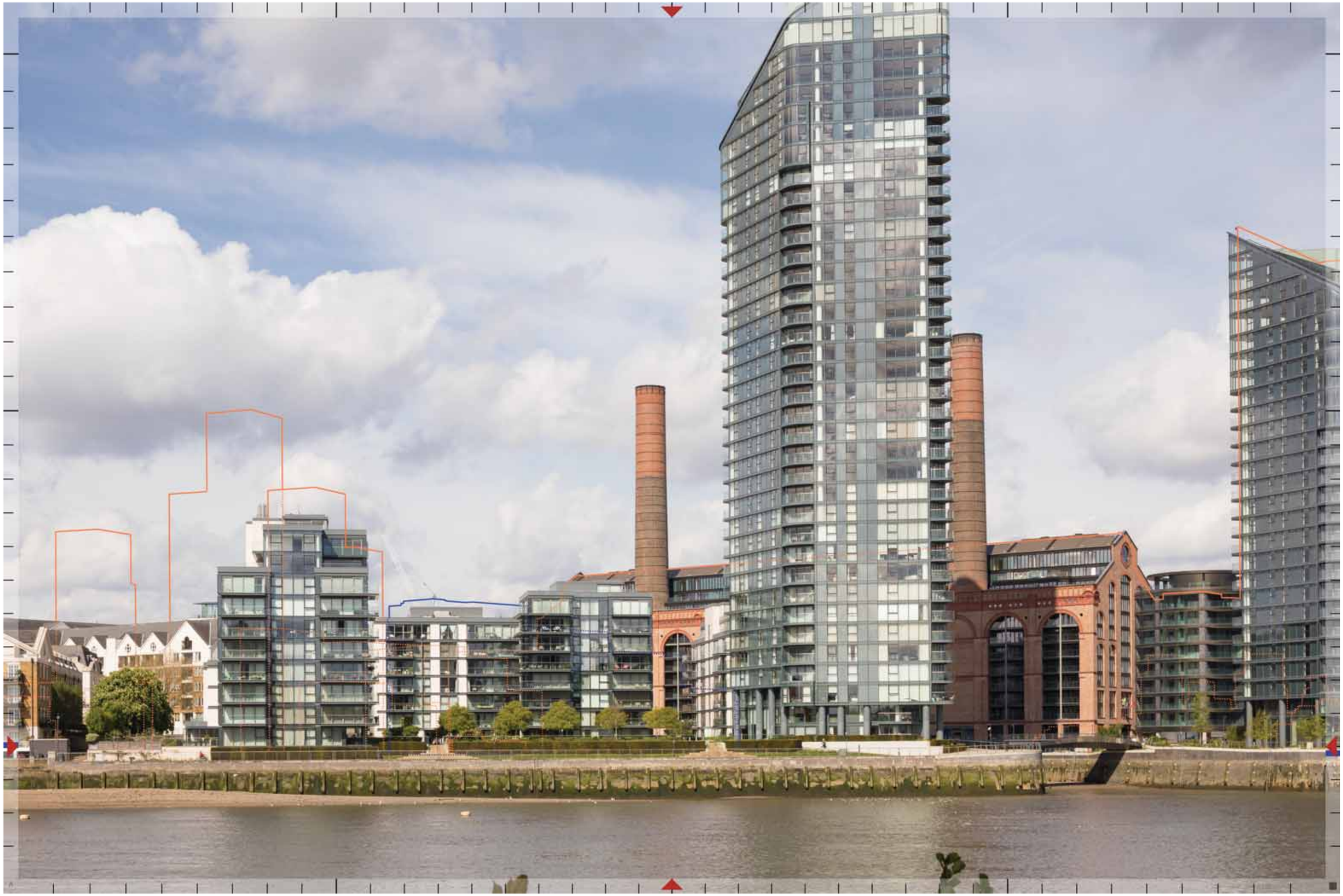

7294_0296 version 250616
Lots Road South, London SW10 [planning] I St Mary&s Battersea - Proposed+Consented

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