



LR41
Heritage, Townscape and Visual Impact Assessment
Montagu Evans

HTVIA: STATEMENT OF CONFORMITY

**TO**

Mount Anvil

CC

Rolfe Judd

FROM

Montagu Evans LLP

DATE

19 September 2025

SUBJECT

Lots Road South
LR41 Heritage, Townscape and Visual Impact Assessment
Revised Proposals – Statement of Conformity

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- 1.1 Montagu Evans LLP are appointed by Mount Anvil (Lots Road) LLP (the ‘Applicant’) to prepare This HTVIA: Statement of Conformity (“SoC”) to support the consideration of proposals to transform Lots Road South.
- 1.2 The Local Planning Authorities are Royal Borough of Kensington and Chelsea (“RBKC”) and London Borough of Hammersmith and Fulham (“LBHF”) and the planning application is referable to the Mayor of London.
- 1.3 The Site sits on the boundary between Royal Borough of Kensington and Chelsea (“RBKC”) and London Borough of Hammersmith and Fulham (“LBHF”), with the authority boundary splitting the site on the north-west to south-east axis. 67% of the site is in RBKC (eastern part); 33% of site in LBHF (western part). The Site is owned by RBKC, and their land ownership extends across both boroughs.
- 1.4 Applications for redevelopment were submitted in July 2025. RBKC validated the RBKC application in August. The LBHF application is pending validation at the time of writing. Since the submission, there have been minor revisions to the scheme. The revisions are summarised below and described in full in the Design and Access Statement Addendum (‘DAS Addendum’) by PRP:
- 1.4.1 Revised mix and residential unit layouts for Block C.
 - 1.4.2 Minor changes to residential unit layouts in Block D.
 - 1.4.3 Minor changes to window and balcony positions for Block C and D.
 - 1.4.4 Building line of the north elevation of Block D to move back (south) by 3 metres (m).
 - 1.4.5 Change to the layout of the access at the northern boundary of the site.
 - 1.4.6 Minor changes to doors and louvres across the ground floor elevations.
 - 1.4.7 Update to Block D refuse strategy.
- 1.5 This SoC confirms that there would be no new or different effects to those set out in the HTVIA on heritage assets, the local townscape character and visual amenity because of the revisions.

RELEVANT CHANGES

- 1.6 The Site contains a small part of the Sands End Conservation Area and non-designated heritage assets. The changes would not affect the aspects of the Proposed Development that affect these assets: there would be no change to how the creek edge in the conservation area is re-landscaped and integrated with the scheme, and the non-designated heritage assets would be demolished and replaced.

- 1.7 The significance of other heritage assets identified in the HTVIA have the potential to be affected by the Proposed Development as a result of change to their setting as a result of external alterations. The same changes to the scheme have the potential to change the conclusions as set out in the townscape and visual impact assessment. The relevant changes are:

- 1.7.1 the change to the building line of Block D.
- 1.7.2 associated changes to the access at the northern boundary of the site.
- 1.7.3 the changes to windows, balconies, doors and louvres.

- 1.8 We comment on these changes below in relation to each area of assessment.

BUILT HERITAGE

- 1.9 The amendments identified above would alter the appearance of the ground floor and building line of Block D and so they affect the part of the development that faces on to the Lots Village Conservation Area.
- 1.10 In our judgement, while those changes will be noticeable, they will not materially affect the conclusions set out in the submitted HTVIA. The elevation and composition would remain an improvement in comparison with the existing condition maintaining what we consider to be an overall enhancement to the setting and significance of the CA.
- 1.11 The amendments associated with the change in appearance to Block C would modestly alter the appearance but would not materially affect the conclusions of the HTVIA when considering the impact on heritage assets. We draw that conclusion on the basis that much of the changes are only visible in a localised visual envelope and so are not seen in the setting of heritage assets.
- 1.12 On that basis the analysis at paragraphs 11.6 to 11.11 of the HTVIA remains sound:

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.

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.

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.

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

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 [sic] 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.

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.

TOWNSCAPE AND VISUAL

- 1.13 The changes to the external appearance of the Proposed Development are *de minimis* in terms of the effect on local townscape character and visual amenity. This is because the overall height, scale, bulk, mass and architectural language and detailing would not change. The adjustments are modest in nature and respond to changes in layouts.
- 1.14 The change to the building line of Block D and elevational changes across the scheme would appear in verified views 1, 3 and 9 in the HTVIA. The revisions would not materially affect the assessments and the conclusions of the HTVIA remains sound. We note the AVRs have not been updated due to the *de minimis* changes to the appearance of the scheme in the context of TVIA assessment.
- 1.15 For completeness the HTVIA concluded that the effects of the development visual receptors ranged from None to Moderate/Major Beneficial, while townscape character areas would experience effects ranging from Minor Neutral to Moderate Beneficial.

CONCLUSION

- 1.16 Having carefully reviewed the proposed amendments to the Proposed Development, we conclude that the changes do not materially affect the assessments set out in the submission
- 1.17 On that basis we consider that the development complies with the design and heritage policies contained in the statutory development plan and the National Planning Policy Framework. On that basis the decision maker can discharge their legal duties set out in the Planning (Listed Buildings and Conservation Areas) Act 1990.

MONTAGU EVANS LLP
19 SEPTEMBER 2025