

**ROLFE JUDD**  
**/ PLANNING**

# **/ Lots Road South Development**

**LR13 PLANNING STATEMENT**

**9th July 2025**

# / Lots Road South Development

Lots Rd, London, SW10 0RN

P08770  
9th July 2025

On behalf of Rolfe Judd Planning Limited

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# 01. INTRODUCTION

## 01.1 EXECUTIVE SUMMARY

- 01.1.1** The Lots Road South Planning Statement supports a full planning application for the redevelopment of a key brownfield site identified in the Royal Borough of Kensington and Chelsea's (RBKC) Site Allocation SA6. The scheme delivers a high-density, mixed-use development that reflects the policy objectives set out in SA6, including the provision of new homes, modern employment space, a community facility, and public realm improvements.
- 01.1.2** Extensive engagement with RBKC, LBHF, the GLA, and the community has shaped the proposals, which meet national, regional, and local policy objectives for brownfield intensification, housing delivery, and sustainable economic growth.
- 01.1.3** The existing site is currently underutilized and accommodates a mix of temporary and permanent commercial facilities. These include Access Self Store, Fairbank Studios, a car pound, temporary cabins, and the Council's highway service depot, which is in the process of being relocated. The Site previously hosted Lots Road Auctions, which moved off-site in March 2024. The area is characterized by a fragmented built form, inactive frontages, and limited public access, with the Site being largely fenced off from the surrounding context and offering minimal contribution to the public realm or streetscape.
- 01.1.4** The application proposes 274 homes, including 118 affordable units comprising 65 extra care homes and 53 general needs units, all at social rent levels. The residential offer is fully tenure blind and integrated with 2,038 sqm of flexible commercial and community floorspace, including 684.3 sqm of affordable commercial space and 274.3 sqm of community centre space, both leased back to RBKC
- 01.1.5** The scheme replaces existing commercial uses with new, high-quality, commercial space, that has been designed flexibly to attract occupiers from a range of sectors both today and in the future. This includes the design and creative industries that currently cluster around the Design Centre and Lots Road, SMEs from other sectors, and the types of traders that the local community have told us they would like to see on Lots Road. This provision is supported by detailed commercial analysis and aligns with the employment-led intent of SA6.
- 01.1.6** The design approach responds directly to SA6 principles, positioning taller elements away from Lots Road, incorporating varied building forms between five and thirteen storeys, and creating active ground floor frontages and courtyard spaces. A new public square, creekside promenade, and linear garden structure the public realm, supported by 401 long stay and 22 short stay cycle spaces for the residential and commercial uses, six accessible parking bays, and a car-free layout. The development achieves an Urban Greening Factor of 0.4 and includes play space for younger children, with an off-site contribution to support new or improved facilities off-site, as part of an area wide strategy.
- 01.1.7** The proposals include a new creek wall, and landscaped intertidal zones. These measures secure a continuous 6.40m AOD flood defence line with a 100-year design life, provide maintenance access, and enable

biodiversity enhancements, supporting long-term ecological resilience. A setback zone along the creek accommodates landscaping, pedestrian access, and habitat creation, in line with Environment Agency guidance and SA6 objectives.

## **01.2 CROSS BOUNDARY APPLICATION**

**01.2.1** 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. 69% of the Site is in RBKC (eastern part); 31% of site in LBHF (western part). The Site is owned by RBKC, and their land ownership extends across both boroughs.

**01.2.2** Since the application site straddles two local planning authority boundaries, identical full planning applications are being submitted to each authority clearly identifying how the Site is divided between the authorities. Each authority is required to assess the application as it relates to the part of the Site within its jurisdiction and each authority must determine the application in accordance with its own development plan unless material considerations indicate otherwise. One such material consideration is the adjoining authority’s development plan, particularly where cross-boundary impacts arise. In practice, authorities are expected to engage with each other to ensure consistency and avoid conflicting decisions, but there is no legal obligation to give weight to the neighbouring authority’s policies beyond this discretionary consideration. Each authority will issue its own separate decision.

**01.2.3** The Lots Road South site is subject to site allocation SA6 in the July 2024 RBKC Local Plan. Since a local authority can only specify policy within the local authority boundary, the Site allocation only applies to the RBKC portion of the Site.

## **01.3 SUMMARY OF KEY BENEFITS**

**01.3.1** The Application Scheme will provide a number of benefits:

- / Alignment with the London Plan, RBKC and LBHF policies for brownfield redevelopment, housing delivery, and employment intensification.
- / 274 sustainable new homes, in an accessible location, helping to address London’s housing crisis.
- / 118 total new social rent homes providing housing for those most in need, on the waiting lists of RBKC/LBHF, this is inclusive of;
  - 65 social rent extra care units, providing a safe, affordable home and care for some of the most vulnerable members of the community, alongside communal facilities to support healthy social lives; and
  - 53 other social rent units, providing safe, affordable homes for families in RBKC and LBHF.
- / A high quality, tenure-blind, integrated housing layout, promoting social cohesion and inclusivity.
- / 2,038 sqm of flexible non-residential floorspace, contributing towards the vibrant and diverse Lots Road Area and providing space for intensification of jobs in the Employment Zone. The new space replaces

outdated and underused commercial buildings with modern, flexible commercial space designed to support a range of occupiers and industries.

- / 684.3 sqm of affordable commercial space, to support social enterprises, startups and other organisations.
- / 274.3 sqm of flexibly designed community centre space, located in the heart of the scheme, available to the whole community.
- / Safeguarding the potential return of the Lots Road Auction House, in a new smaller, modern format.
- / A new creek wall and landscaped intertidal habitats, improving biodiversity, securing flood defences (6.40m AOD), and supporting ecological resilience.
- / Public access and new routes through the Site, replacing a private inaccessible site, improving connectivity
- / Extensive new and improved public realm including widened pavements on Lots Road, a generous creekside promenade, new verdant community square, and 4,473 sqm of open and amenity space.
- / A radical greening of the environment, including 48 new trees, green squares and gardens, biodiverse roofs, and new habitats, all contributing towards an Urban Greening Factor of 0.4.
- / Provision of 401 long-stay and 22 short-stay cycle parking spaces, promoting healthy sustainable travel
- / A car-free development, with up to eight accessible parking spaces, to support those with specific needs
- / A high quality, contextually appropriate, design response to the Site allocation SA6 and the Lots Road South Design Brief SPD, placing taller buildings away from Lots Road, activating frontages, and delivering courtyard spaces.

## 01.4 APPLICATION SUPPORTING DOCUMENTS

01.4.1 This planning statement should be read in conjunction with the following additional documents, which accompany the application:

- / LR01 Application Forms + Certificates (Rolfe Judd Planning)
- / LR02 Application Fee (NHG)
- / LR03 CIL Forms (Rolfe Judd Planning)
- / LR04 Application Covering Letter (Rolfe Judd Planning)
- / LR05 Site Plan (PRP)
- / LR06 Block Plan (PRP)
- / LR07 Existing Floor, Elevations and Roof Plans (PRP)
- / LR08 Proposed Floor, Elevations, Roof Plans and Sections (PRP)
- / LR09 Existing Landscape Plans (BDP)
- / LR10 Proposed Landscape Plans (BDP)
  - o *Please see appended drawing schedules for full drawing references.*
- / LR11 Design and Access Statement (PRP)
- / LR12 Landscape Statement (BDP)

- / LR13 Planning Statement (Rolfe Judd Planning) (this document)
- / LR14 Affordable Housing Statement (DS2)
- / LR15 Commercial Report (Chillmark)
- / LR16 EIA Screening (Trium)
- / LR17 Energy Strategy (IN2)
- / LR18 Sustainability Statement (IN2)
- / LR19 Circular Economy Statement (IN2)
- / LR20 Whole Life Carbon Assessment (IN2)
- / LR21 Overheating Assessment (IN2)
- / LR22 Air Quality Assessment (AQC)
- / LR23 Noise and Vibration Impact Assessment (Stantec)
- / LR24 Commercial Property Ventilation and Extraction Details (IN2)
- / LR25 Wind & Microclimate Assessment (GIA)
- / LR26 Transport Assessment (Stantec)
- / LR27 Outline Travel Plan (Stantec)
- / LR28 Outline Delivery and Servicing Strategy (Stantec)
- / LR29 Waste Management Statement (Stantec)
- / LR30 Demolition and Construction Management and Logistics Plan (Stantec)
- / LR31 Flood Risk Assessment and SuDS (Stantec)
- / LR32 Lighting Strategy (Light Follows Behaviour)
- / LR33 Baseline River Condition Assessment (Greengage)
- / LR34 Water Supply Capacity and Water Utility Assessment (IN2)
- / LR35 Ground Contamination Report (Stantec)
- / LR36 Basement Impact Assessment (Stantec)
- / LR37 Daylight – Internal Daylight Assessment (Chancery Group)
- / LR38 Daylight – External Daylight and Sunlight Assessment (Chancery Group)
- / LR39 Financial Viability Assessment (DS2)
- / LR40 Fire Statement (BB7)
- / LR41 Heritage, Townscape and Visual Impact Assessment (Montagu Evans)
- / LR42 Archaeological Desk-Based Assessment (RPS)
- / LR43 Tree Survey and Arboricultural Impact Assessment (Sharon Hosegood Associates)
- / LR44 BREEAM Pre-Assessment (IN2)
- / LR45 Biodiversity Survey and Report (Greengage)
- / LR46 Biodiversity Net Gain Assessment (Greengage)
- / LR47 Statement of Community Involvement (London Communications Agency)
- / LR48 Health Impact Assessment (Trium)

## 01.5 GLOSSARY OF ACRONYMS

01.5.1 The following acronyms are used in this report:

- / AOD – Above Ordnance Datum
- / AQ – Air Quality
- / ASHP – Air Source Heat Pump
- / BNG – Biodiversity Net Gain
- / BREEAM – Building Research Establishment Environmental Assessment Method
- / DAS – Design and Access Statement
- / DEFRA – Department for Environment, Food and Rural Affairs
- / EIA – Environmental Impact Assessment
- / EV – Electric Vehicle
- / FFL – Finished Floor Level
- / FRA – Flood Risk Assessment
- / GIA – Gross Internal Area
- / GLA – Greater London Authority
- / LBHF – London Borough of Hammersmith and Fulham
- / LPA – Local Planning Authority
- / LVMF - London View Management Framework
- / NPPF – National Planning Policy Framework
- / RBKC – Royal Borough of Kensington and Chelsea
- / SAP – Standard Assessment Procedure
- / SPD – Supplementary Planning Document
- / SuDS – Sustainable Drainage Systems
- / TfL – Transport for London
- / UGF – Urban Greening Factor

## 02. THE APPLICATION SITE AND SURROUNDING AREA

### 02.1 SITE DESCRIPTION & LOCATION

- 02.1.1** 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. 69% of the Site is in RBKC (eastern part); 31% of site in LBHF (western part). The Site is owned by RBKC, and their land ownership extends across both boroughs.
- 02.1.2** The Site sits in the south-west corner of RBKC, where it meets the southeast corner of LBHF. It is located on the south-western side of Lots Road between Chelsea Harbour and the King's Road. The Site is located within Lots Road Employment Zone. It is immediately adjacent to the Lots Village Conservation Area and a small part of the Site in the southwest corner is located in the Sands End Conservation Area.
- 02.1.3** The Site is well connected and accessible, with a PTAL rating of 3 and 4. It is within walking distance of Imperial Wharf overground station and Fulham Broadway and is served by frequent bus services.
- 02.1.4** The Site currently comprises the former two storey 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 RBKC's street sweeping and recycling service providers. An access road runs through the Site which provides access to 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 application Site also includes the car park and surrounding areas of Heatherley School of Fine Art.
- 02.1.5** The part of the Site located in RBKC is allocated as Policy SA6 Lots Road South in RBKC's New Local Plan Review (July 2024). The part of the Site located in LBHF is not allocated for any use.
- 02.1.6** The surrounding area predominantly comprises residential dwellings, commercial uses and education uses. To the north of the Site is Heatherley School of Fine Art. To the east of the Site is 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.
- 02.1.7** The surrounding height and massing context comprises a mix of scales. To the east, the Lots Village Conservation Area is characterised by low-rise, two- to three-storey terraced housing. Further north along Lots Road from the subject site, the prevailing building heights are three to six storeys. To the west the Imperial Gasworks site includes a tower rising to 37 storeys, establishing a precedent for taller massing in proximity to the Site.

## 02.2 LAND OWNERSHIP

02.2.1 The land ownership within the red line area is comprised of the following land parcels:

Title Number	Tenure	Proprietor	Property
BGL102831	Freehold	THE MAYOR AND BURGESSES FOR THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA of Town Hall, Hornton Street, London W8 7NX.	Land on the south-west side of Lots Road, London.
BGL139910	Freehold	THE MAYOR AND BURGESSES OF THE ROYAL BOROUGH OF KENSINGTON & CHELSEA of Town Hall, Hornton Street, London W8 7NX and of DX84015, Kensington High St 2.	Land on the south west side of Lots Road, London.
BGL35365	Freehold	THE MAYOR AND BURGESSES OF THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA of Town Hall, Hornton Street, London W8 7NX.	Fairbank Studios, 65-69 Lots Road, London (SW10 0RN).
BGL63899	Freehold	THE THOMAS HEATHERLEY EDUCATIONAL TRUST LIMITED (Co. Regn. No. 00977615) of 75 Lots Road, London, SW10 0RN	75 Lots Road, London (SW10 0RN).
LN44381	Freehold	THE MAYOR AND BURGESSES OF THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA of Town Hall, Hornton Street, London W8 7NX.	71 Lots Road, London (SW10 0RN).
NGL430147	Freehold	THE MAYOR AND BURGESSES OF THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA of Town Hall, Hornton Street, Kensington, London W8 7NX and of DX84015, Kensington High St 2.	Chelsea Creek, Lots Road, London.
NGL487738	Freehold	THE MAYOR AND BURGESSES OF THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA of The Town Hall, Hornton Street, London W8 7NX and of DX84015, Kensington High St 2.	land on the south west side of Lots Road, London.

## 02.3 RELEVANT PLANNING HISTORY

02.3.1 The Application site has not been subject to any significant development proposals. The planning history reflects minor works relating to the current employment functions of the Site.

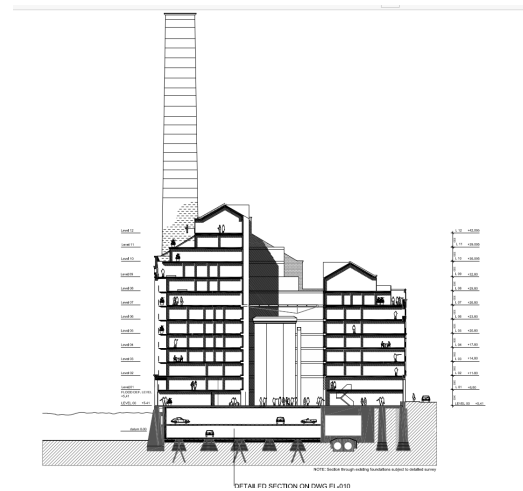
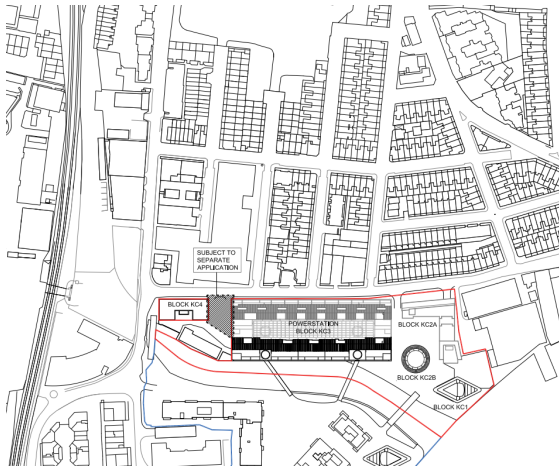
## 02.4 ADJACENT DEVELOPMENTS

02.4.1 There are two significant adjacent development sites that have been taken account of when developing the proposal for Lots Road South:

### RBKC

- / Lots Road Power Station (PP/02/01324), located c.100m east of Lots Road South

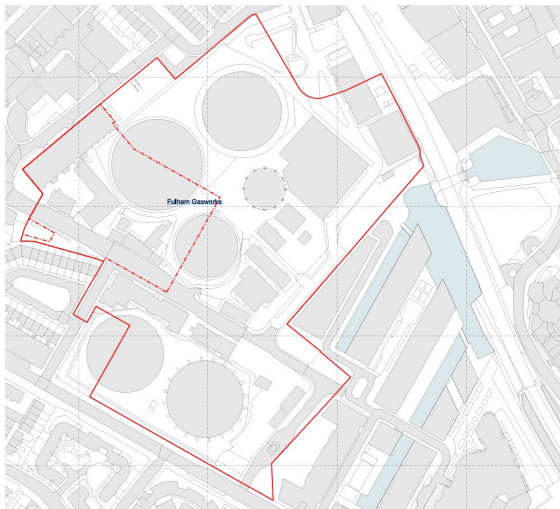
Conversion of Power Station to provide a mix of residential, retail, office, business and restaurant uses, together with erection of a 30 storey residential tower with ground floor gym, a 3-8 storey building incorporating commercial and residential uses, a 7 storey residential building, associated parking, servicing and landscaping, and works to Chelsea Creek, including three pedestrian bridges. Delivering approximately 4900sq. m of retail and business space and over 420 new homes. The scheme has been largely completed as of June 2025.



## LBHF

- / Imperial Gasworks (2018/02100/COMB), located directly to the west of the West Londo Line.

A major residential-led, mixed-use scheme comprising a part-detailed, part-outline planning application for the redevelopment of land west of the railway in LBHF, allocated under strategic policy SFRRRA1. It includes demolition of most existing structures, retaining key heritage buildings such as the No.2 Gasholder and war memorials. The proposal delivers up to 1,843 homes (including 646 affordable units) in buildings up to 37 storeys, alongside flexible commercial, office, community, and leisure space. The detailed element includes 37,774sqm of residential floorspace and supporting uses, while the outline element allows for up to 166,560sqm of residential and 6,895sqm of non-residential space. The scheme also includes new open spaces, pedestrian and vehicle routes, landscaping, basements, servicing, and associated infrastructure.



## 03. PRE-APPLICATION CONSULTATION

03.1.1 Paragraph 137 of the National Planning Policy Framework (NPPF, December 2024) states that:

*‘Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.’*

03.1.2 Further details of the pre-application consultation undertaken with regards to the Application Scheme are contained within the LR47 Statement of Community Involvement prepared by the London Communications Agency. It provides a summary of the extensive consultation to date both prior to submission and post submission and the commitment to on-going engagement in the future.

03.1.3 To date the development proposals have been the subject of pre-application discussions with the planning authorities, the GLA and members of the public.

## 03.2 GREATER LONDON AUTHORITY

/ GLA Pre-app 01 – October 2023

/ GLA Pre-app 02 - August 2024

## 03.3 ROYAL BOROUGH OF KENSINGTON AND CHELSEA

/ Introduction Meeting – July 2023

/ RBKC Pre-app 01 – July 2023

/ RBKC Pre-app 02 – September 2023

/ RBKC QRP 01 – September 2023

/ RBKC Pre-app 03 – October 2023

/ RBKC Pre-app 04 – June 2024

/ RBKC QRP 02 - March 2024

- / RBKC Pre-app 05 – June 2024
- / RBKC Pre-app 06 – June 2024
- / RBKC Pre-app 07 – February 2025
- / RBKC Pre-app 08 – February 2025
- / RBKC Drainage Workshop – April 2025
- / RBKC Elevations Workshop – May 2025
- / RBKC Pre-app 09 – June 2025

### **03.4 LONDON BOROUGH OF HAMMERSMITH AND FULHAM**

- / Introduction Meeting – July 2023
- / LBHF Pre-app 01 – September 2023
- / LBHF Pre-app 02 – November 2023
- / LBHF Pre-app 03 – June 2024
- / *LBHF Pre-app 04 – 06 not used*
- / LBHF Pre-app 07 – February 2025
- / LBHF Transport and Layout Workshop – March 2025
- / LBHF Heights and massing Workshop – April 2025
- / LBHF Accessibility Workshop – April 2025
- / LBHF Pre-app 08 – May 2025
- / LBHF Pre-app 09 – June 2025

### **03.5 PUBLIC CONSULTATION**

- 03.5.1** The Statement of Community Involvement for the Lots Road South redevelopment outlines a comprehensive and multi-phase strategy for engaging the community and stakeholders throughout the pre-application planning process. The consultation was led by Mount Anvil in partnership with the Royal Borough of Kensington and

Chelsea (RBKC) and was informed by previous council-led community engagement, including the development of a Supplementary Planning Document (SPD).

#### Consultation Strategy

- 03.5.2** The Applicant delivered a four-phase public consultation programme between Spring 2023 and Spring 2025. This included stakeholder meetings, public exhibitions, workshops, door-knocking, development forums hosted by RBKC, and a project website. Communications methods included newsletters, flyers, social media campaigns, and email updates. Consultation aimed to be inclusive, transparent, and iterative allowing feedback to directly shape the proposals over time. Key objectives were to involve residents from both RBKC and LBHF, respond openly to concerns, and ensure engagement was accessible through various channels.
- 03.5.3** Each phase built on previous feedback. The first phase introduced the project and explored site opportunities and constraints. Subsequent phases presented emerging designs, tested massing options, and addressed public priorities. Engagement with statutory bodies, local groups (e.g., Lots Road Neighbourhood Forum), businesses, and residents was ongoing and tailored to reach both boroughs.

#### Main Themes Raised

- / Height and Massing: The most persistent theme across all phases was building height, density, and overshadowing. Local residents preferred taller elements set away from Lots Road, closer to the railway and Creek.
- / Housing Mix and Tenure: Feedback reflected mixed views on housing. While some welcomed affordable and extra care housing, others expressed concern about the proportion of social housing to market housing ratio and questioned the need for private homes, although a 100% affordable scheme is not viable as demonstrated in the LR39 Financial Viability Assessment.
- / Public Realm and Open Space: There was strong support for new green spaces, including a community square by the Creek, wider footpaths, and enhanced landscaping. Respondents asked for spaces to be usable, secure, and accessible, with some advocating for quiet, reflective areas and others wanting recreational amenities.
- / Community Facilities and Ground Floor Uses: Desired uses for commercial space included cafes, retail, medical services, workspaces, and a community centre offering educational and youth programmes. There was also interest in retaining the Auction House in some form.
- / Design and Character: Respondents asked that the architectural language reflect the surrounding area. Feedback indicated a preference for materials and façade treatments that harmonise with the local character and context.

- / Traffic and Construction Impact: Residents were concerned by their perception the scheme could result in congestion on Lots Road. Safety at crossings, parking pressures during construction, and the overall impact on local infrastructure were also raised.
- / Engagement Process: The consultation itself was generally viewed positively, with appreciation for early and continued outreach. Requests were made for more Q&A time, better venues, and ongoing updates post-submission.

**03.5.4** The public consultation events were as follows:

Phase One – Summer 2023

- / Meet the Team events
  - o 31 May 2023, 10am–6pm
  - o 6 June 2023, 12pm–8pm
- / Community Workshop
  - o 19 July 2023, 6:30pm–8pm

Phase Two – Autumn 2023

- / Public Exhibition
  - o 3 October 2023, 4:30pm–7:30pm
  - o 5 October 2023, 8am–11am
- / RBKC Development Forum: date not specified 13th December 2023

Phase Three – Summer 2024

- / Public Exhibition
  - o 20 July 2024, 12pm–3pm
  - o 23 July 2024, 4pm–7:30pm

Phase Four – Spring 2025

- / Public Exhibition
  - o 26 March 2025, 4pm–8pm

- 29 March 2025, 10am–2pm
- / These events were supplemented by ongoing outreach such as door knocking, stakeholder meetings, online surveys, newsletters, and updates to the consultation website.

## 04. APPLICATION SCHEME

**04.1.1** The proposed scheme at Lots Road South comprises the comprehensive redevelopment of the Site to deliver a high-density, mixed-use development. It includes three buildings arranged as five blocks, ranging in height from five to thirteen storeys. The development will provide 274 residential units, including 65 extra care homes, 53 affordable general needs homes, and 156 market units. 2,038 sqm of flexible commercial and community space will be delivered, alongside significant public realm improvements and landscaped open spaces. The scheme is car-free aside from eight accessible parking spaces and includes a basement for plant and cycle storage.

**04.1.2** The description of development is:

*‘Cross boundary (Royal Borough of Kensington & Chelsea and London Borough of Hammersmith & Fulham) detailed planning application for the complete demolition of existing buildings and structures and the comprehensive redevelopment to provide a mixed-use scheme comprising the creation of housing (Use Class C3) (274 homes, including affordable homes (extra care home units and general needs units)), and non-residential floorspace (2,038sqm) comprising commercial, business and service floorspace (Use Class E) and Local Community and Learning floorspace (Use Class F1 a/b and Use Class F2) in new buildings ranging from 5 to 13 storeys with basement, public realm works and other ancillary works including works to the Chelsea Creek wall, and new access arrangements from Lots Road..’*

### Scale and Land Use

**04.1.3** The Application Scheme proposes a high-density, mixed-use scheme delivered across three buildings arranged as five blocks. The buildings range in height from five to thirteen storeys, with taller elements positioned towards the centre and southern edge of the Site to mitigate impacts on surrounding heritage assets and lower-rise residential areas. The massing strategy incorporates stepped heights and articulated forms to respond to the varied urban context, while creating a distinctive townscape character and accommodating breaks in the built form for permeability and visual interest.

**04.1.4** The footprint is carefully configured to retain key view corridors and integrate with surrounding streets and buildings. Publicly accessible spaces are a central feature of the masterplan, including a new community square, play areas, and a creekside promenade, ensuring a generous proportion of the Site is devoted to high-quality open space and landscape-led interventions. The proposals include a basement level introduced for plant, servicing, and long-stay cycle parking.

## Layout

**04.1.5** The proposed development comprises five blocks arranged across the Site, with Blocks D and E fronting Lots Road at five storeys to respect the adjacent conservation area, and Blocks A, B, and C positioned to the west, stepping up from nine to thirteen storeys adjacent to the railway. This massing strategy creates a gradient of height across the Site, with lower-rise elements activating the street frontage and taller elements addressing the less sensitive western boundary. A central pedestrian route runs east–west through the Site, connecting Lots Road to new public realm along Chelsea Creek, including a community square. The layout integrates commercial and community uses at ground floor level, particularly along the Lots Road frontage, with residential units above and to the rear, and includes podium-level and creekside amenity spaces for residents

## Employment and Non-residential Uses

- 04.1.6** The proposed development will deliver 2,038 sqm of non-residential floorspace, comprising a range of employment and community uses. This includes 1,656 sqm GIA of flexible commercial units aimed at accommodating occupiers from the design and creative industries, local businesses and traders. The commercial spaces are designed with active frontages and adaptable layouts to support a diverse mix of occupiers in dynamic sectors, such as shops, cafés, showrooms, and workspaces, reinforcing the Site's role within the Lots Road Employment Zone and contributing to the vibrancy and economic sustainability of the area. The commercial space has been designed to accommodate a Lots Road Auction House showroom, if they choose to return to the Site.
- 04.1.7** A key element of the non-residential offer is the provision of 684.3 sqm GIA of Affordable Commercial Space. This workspace will be leased back to the Royal Borough of Kensington and Chelsea as part of its social investment objectives, ensuring that it remains accessible to local enterprises and organisations that deliver community benefit. The affordable workspace will be integrated into the ground floor layout and located prominently to encourage visibility and engagement with the wider community.
- 04.1.8** The scheme provides a 274.3 sqm of community centre space situated at the heart of the development adjacent to the new public square. The centre will serve as a flexible, multi-functional space capable of accommodating a wide range of community uses, activities, and events. Its central location ensures accessibility for all residents, and helps to foster a cohesive, inclusive community. Together, these non-residential uses form a core part of the scheme's mixed-use character, promoting social interaction, economic opportunity, and local service provision.
- 04.1.9** The scheme provides 107.9 sqm GIA of F1(a)(b) floorspace on the north east corner. This is located opposite Heatherley School of Fine Art and is envisaged to be occupied by them for use as a ceramics studio and art gallery.

Use Class	Space	GIA
F2	Community Centre	274.3
F1(a)(b)	Ceramics studio & Art Gallery	107.9
E(g)	Affordable Commercial Space	684.3
E(a) E(b)	Café	143
E(a)	Commercial A	83.9
E(a)	Commercial D	448.5
E(a)	Commercial E	296.3
<b>Total</b>		<b>2038.2</b>

Use Class	Space	GIA
F2	Community Centre	274.3
F1(a)(b)	Ceramics studio & Art Gallery	107.9
E(g)	Affordable Commercial Space	684.3
E(a)(b)(g)	Flexible Commercial Space	971.7
<b>TOTAL</b>		<b>2038.2</b>

*Summary of proposed non-residential floorspace*

#### Extra Care Affordable Homes

- 04.1.10** The proposed development includes a total of 65 extra care homes, all of which will be delivered as social rent units and made available to residents of the Royal Borough of Kensington and Chelsea. These homes will be integrated within the broader residential development but designed with specific consideration for the needs of older people requiring additional care and support. The extra care units will be fully self-contained, allowing residents to maintain independence while having access to on-site care and support services as required.
- 04.1.11** The extra care provision is located in a dedicated block, with direct adjacency to the new community centre and public square to ensure easy access to social and recreational opportunities. The layout has been carefully developed to promote accessibility, safety, and wellbeing, incorporating features such as step-free access, generous internal circulation, and clear wayfinding. Communal spaces specific to the extra care component such as shared lounges, meeting areas, and outdoor amenity terraces are integrated at podium level and within the block to foster social interaction among residents.
- 04.1.12** The design also prioritises secure and convenient access to the wider site, with direct links to landscaped areas, play spaces, and the creekside promenade. Internal layouts of the extra care flats are optimised for mobility needs, incorporating design measures such as wider doorways, adaptable bathrooms, and provision for assistive technologies. In addition, the proximity of the community centre to the extra care accommodation supports intergenerational use and inclusion, enabling residents to participate in wider community life while benefiting from purpose-built homes that meet their evolving needs.

### General Needs Affordable Homes

- 04.1.13** The Application Scheme delivers 53 general needs affordable homes, all of which will be provided at social rent levels. These homes form part of a wider affordable housing offer that includes the 65 extra care units, bringing the total affordable provision to 118 homes. The general needs units will offer a range of typologies, including one, two, and three-bedroom homes, catering to diverse household sizes and supporting long-term community stability.
- 04.1.14** The general needs affordable homes will be divided between the two local authorities in line with the cross-boundary nature of the Site. This arrangement ensures that the housing needs of both boroughs are addressed, reflecting the collaborative approach taken to the development of the Site and its shared location across borough boundaries.
- 04.1.15** All affordable homes, including both the general needs and extra care units, will be tenure blind. This means they will be indistinguishable from the market housing, ensuring consistency in architectural expression, materials, and access to communal spaces. The integration of the affordable homes promotes social cohesion, avoids segregation, and contributes to the creation of a mixed and inclusive community.

### Market Homes

- 04.1.16** The proposals include 156 market homes which are integrated into a tenure-blind layout alongside the affordable general needs homes, ensuring no visual distinction between tenures. The homes will range in size and type to cater to a diverse demographic, and their distribution across the scheme has been designed to optimise daylight access, views, and proximity to public and communal spaces. All homes, are designed to meet the highest residential quality standards, including dual aspect layouts where possible, private outdoor space, and access to shared amenities such as podium gardens, cycle storage, and communal facilities.
- 04.1.17** The market housing is a critical component of the scheme's financial viability, cross-subsidising the delivery of 118 affordable homes, extensive public realm improvements, and social infrastructure. The market units will contribute to the strategic housing delivery targets set by both RBKC and LBHF. The inclusion of these homes on an allocated brownfield site optimises land use in accordance with the London Plan and national housing objectives, particularly supporting intensification in areas with good public transport access.

### Residential Summary

Category	1 Bed	2 Bed	3 Bed	Total Units
Open Market	64	80	12	156
Extra Care Social	65	0	0	65
General Needs	9	28	16	53
<b>Total Residential</b>	<b>138</b>	<b>108</b>	<b>28</b>	<b>274</b>

### Unit mix by Habitable Room

Open Market homes : 400 (55.5%)

Social Rent Extra Care homes: 139 (19.3%)

Social Rent General Needs homes : 182 (25.2%)

**Total: 721**

### Creek Wall

**04.1.18** Chelsea Creek, a former tidal stream flowing from Kensal Green to the Thames, has played a significant industrial and infrastructural role in the history of the Lots Road South site. Canalised in the early 19th century to form the Kensington Canal, it was later infilled and partially replaced by railway infrastructure. The remaining southern section continued to support industrial uses, including the Lots Road Power Station, and today forms the southern boundary of the Site.

**04.1.19** The creek is now largely enclosed by retaining walls of concrete, steel, and brick, although one section remains an unconsolidated bank of made ground. Planning permissions granted in 2022 for a new creek wall have not been taken forward. Revised proposals integrated into the current development include a new piled flood defence wall, repairs and realignment of existing deteriorated sections, and a landscaped embankment solution to the west, all achieving a continuous defence height of 6.40m AOD exceeding 2100 flood protection requirements.

**04.1.20** The wall will be engineered to a 100-year lifespan without tie-rods and allow full maintenance access. Following consultations with the Environment Agency and the boroughs the scheme provides a setback zone of 6.3 metres, with pedestrian access, landscaping, space for maintenance and intertidal terracing. These measures, alongside detailed technical assessments, ensure the creek works support the wider objectives for flood protection, biodiversity, access, and long-term resilience.

### Access and Parking

**04.1.21** The Application Scheme has been designed to prioritise pedestrian and cycle movement while minimising reliance on private vehicles. Access to the Site will be primarily from Lots Road, with clearly defined pedestrian routes leading to building entrances, public spaces, and the creekside promenade. The layout enhances permeability and connectivity across the Site, integrating it into the surrounding neighbourhood and encouraging active travel through safe, legible, and inclusive access points. The northern most access point onto Lots Road is shared with the Heatherley School of Fine Art in order to provide a single legible entrance into the new shared courtyard space.

**04.1.22** The scheme is car-free, apart from the provision of six on-site accessible parking spaces designated for disabled residents and visitors. Through the pre-application process, RBKC has confirmed an additional two can be provided on Lots Road, subject to demand. The on-site spaces will be located within the Site at grade level and will be fully compliant with accessibility standards. The absence of general car parking reflects the Site's strong public transport accessibility, including proximity to Imperial Wharf Overground Station, Fulham

Broadway Underground Station, and nearby bus and river services. This approach supports sustainable travel patterns and reduces traffic impacts on Lots Road.

- 04.1.23** Cycle parking provision forms a key element of the transport strategy. 382 long-stay cycle spaces in secured stores for residential and 19 long stay cycle places in the commercial units will be provided. 22 short-stay cycle parking spaces have been proposed in the landscape. This is less than the 65 required by policy, but this has been agreed with the LPA's to avoid cluttering the landscape.
- 04.1.24** . The cycle strategy supports modal shift towards sustainable transport and aligns with wider policy objectives for reducing car dependency and promoting health and environmental benefits through active travel.

### Landscape

- 04.1.25** The landscape strategy for the Application Scheme prioritises the transformation of a currently inaccessible and underused site into a high-quality, pedestrian-focused public realm with integrated biodiversity and amenity spaces. From the outset, the landscape design has been a core element of the development, shaped through extensive consultation with local authorities, stakeholders, and the public. The strategy addresses RBKC's design brief and seeks to strengthen the Site's relationship with its urban and ecological context, notably through the enhancement of Chelsea Creek and the creation of accessible public and private green spaces. A total of 4,473 sqm of open space and amenity space is being provided, including 289m of play space.
- 04.1.26** Central to the vision is a new linear garden that forms the heart of the scheme. This includes a two-level layout: a publicly accessible ground-level garden and an upper communal garden for residents, incorporating play space, planting, and dedicated areas for Extra Care residents. The design ensures separation of uses while maintaining visual cohesion, and excludes vehicle access from most spaces to ensure pedestrian safety and amenity. Chelsea Creek is reimagined as a public-facing asset, with collapsed walls repaired, marginal habitats introduced, and a new waterside promenade created. This contributes to biodiversity and provides a functional, attractive boundary along the southern edge.
- 04.1.27** Along Lots Road, the public realm is widened and enhanced to create a more active frontage with improved pedestrian circulation, consistent paving, and new public spaces, including a key arrival node near Chelsea Harbour Drive. Integration with the Heatherley School of Fine Art improves the school's entrance and circulation, while shared surfaces reduce vehicular intrusion. The western edge of the Site, although constrained by rail and borough boundaries, is activated with a new 4.4–5.8m-wide route that supports servicing and access while maintaining design consistency and high-quality materials.
- 04.1.28** Supporting strategies include a focus on biodiversity enhancement through tree planting, native and climate-resilient species, biodiverse roofs, and intertidal habitat creation in the Creek. The scheme achieves an Urban Greening Factor score of 0.4 and maximises soft landscaping where feasible. Play provision totals 224m<sup>2</sup> for 0–4 year olds, with an acknowledged shortfall for older age groups to be addressed through an off-site contribution. Access strategies balance the needs of pedestrians and essential service vehicles through shared routes and one-way systems to minimise conflict. A comprehensive landscape management plan will ensure long-term maintenance and performance of the public realm.

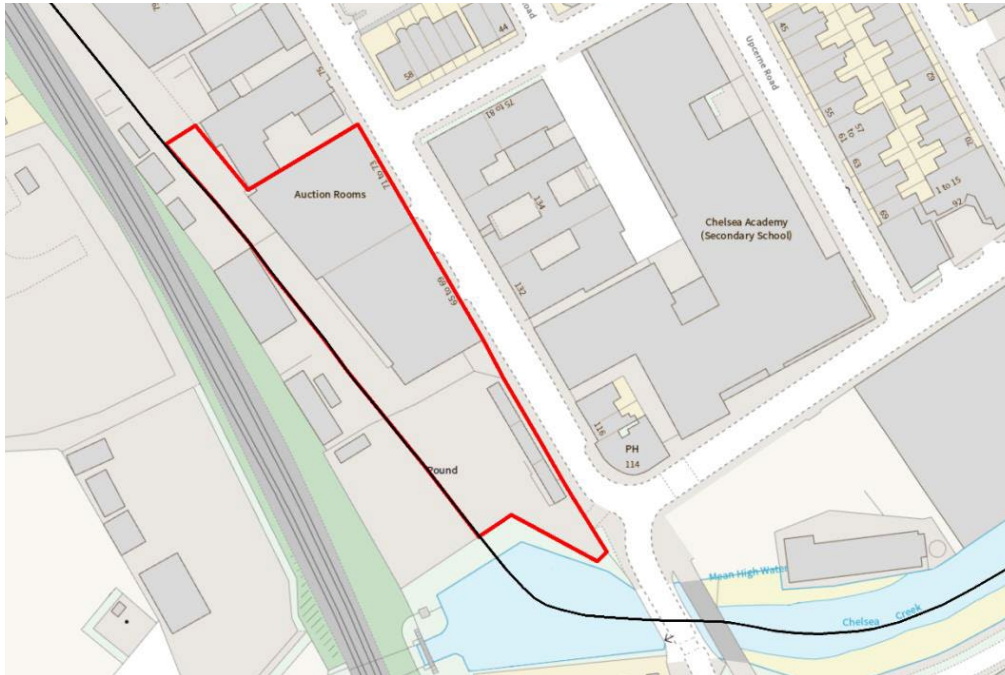
## **05. RELEVANT PLANNING POLICIES**

### **05.1 DEVELOPMENT PLAN**

- 05.1.1** The Application Scheme has been developed in accordance with the relevant national policy guidance, Strategic and Local Planning Policy and guidance. This section sets out the relevant adopted and emerging planning policy framework, against which the Application Scheme will be considered in Section 5 of this Planning Statement.
- 05.1.2** In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise. The adopted Development plan documents relevant to the Application Site are as follows:
- / London Plan (March 2021)
  - / Royal Borough of Kensington and Chelsea New Local Plan Review (July 2024)
  - / London Borough of Hammersmith and Fulham Local Plan (February 2018)
- 05.1.3** National planning policy guidance is provided through the NPPF which is a material consideration in the determination of any application:
- / National Planning Policy Framework (NPPF) – December 2024
- 05.1.4** There are no extant Neighbourhood Plans relevant to the area.

## 05.2 SITE ALLOCATION

**05.2.1** The Lots Road South site is subject to site allocation SA6 in the July 2024 RBKC Local Plan. Since a local authority can only specify policy within the local authority boundary, the Site allocation only applies to the RBKC portion of the Site, which approximately makes up the eastern 2/3 of the Lots Road site.



Site Allocation SA6 area in red, with the RBKC/LBHF authority boundary show in black.

**05.2.2** The Site allocation sets out the following requirements:

### **SA6: Lots Road South**

**A.** The Site will deliver a high-quality mixed-use development that is employment led, to include residential and employment floorspace.

#### **Land use**

**B.** Around 100 new gross residential (C3) units.

**C.** Around 65 gross affordable extra care units.

**D.** Around 4,000 sq m (GIA) of commercial floorspace (Class E and B8) of which at least 3,000 sq m will be business floorspace (Class E(g) office, research and development or light industrial or B8 storage or distribution).

## **Principles**

*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.*

*F. The existing auction house use (sui generis) should be retained in addition to the floorspace specified in part D.*

*G. The character should be employment use led, informed by end user needs incorporating flexibility, opportunities for collaboration and practical needs.*

*H. The design, construction and operation of the development shall be informed by the energy hierarchy, circular economy and urban greening principles.*

*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.*

*O. Ensure the development does not compromise the quality of the light to Heatherley School of Fine Art north-east facing windows.*

*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.*

*R. Incorporate a buffer zone along the full length of the Site adjacent to the railway, to allow for a future cycleway and pedestrian route.*

*S. Led by a clear servicing strategy, including for van drop-offs and collections.*

*T. Community space shall be located above basement level and allow for wide range of activities.*

*U. Locate the extra care use in an optimal location for future residents following the principles of Design for Dementia; including outdoor space.*

*V. Ensure some on-site facilities are designed to provide overlaps between the different resident groups, workers and the wider community.*

*W. The development to comply with the agent of change principle given the location within an employment zone.*

### **Infrastructure and Planning Contributions**

*X. Development will be liable to make planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.*

**05.2.3** Supporting paragraph 3.22 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'*

## **05.3 LOTS ROAD SPD**

**05.3.1** RBKC published the Lots Road South Design Brief SPD in July 2022. This document is a material consideration for a future planning application and forms the framework for which any future planning application relating to the Site is determined and relates to the whole site, including both RBC and LBHF land.



*Extract from Lots Road SPD showing the Site in red. The dashed blue line reflects the RBKC/LBHF authority boundary.*

**05.3.2** The SPD includes 15 design principles which are intended to shape and guide the design of a development proposal for the Site, which can be summarised as:

- 1) Employment Zone Identity: The character of the development should be led by the employment use, with the commercial space informed by the needs of the end user and designed accordingly, including flexibility, opportunities for collaboration and practical needs.
- 2) Sustainability: The design, construction and operation of the development shall be informed by the energy hierarchy, circular economy and urban greening principles.
- 3) Lots Road Buildings: There should be a series of buildings along Lots Road with modest variation in form, rather than a uniform block, at a height that respects the scale of existing buildings on Lots Road.
- 4) Character of Architecture: Ensure the architecture and materials reference the industrial heritage and character of the area.
- 5) Overall Height Principles: The development should locate taller buildings away from Lots Road, to more suitable parts of the Site.
- 6) Lots Road Commercial Activity: Create an active frontage on Lots Road with a variety of commercial uses at ground floor.
- 7) Courtyards: Create courtyard space(s) within the development accessed through gaps between buildings.
- 8) Light to Heatherley School: Ensure the development does not compromise the quality of the light to Heatherley School of Fine Art north-east facing windows nor result in overlooking or a loss of privacy for rooms served by the windows.
- 9) Public Space: Create a new public space, designed to be attractive, welcoming and accessible to all.
- 10) Chelsea Creek: Make a feature of the creek within the landscape strategy.
- 11) Allowance for Green Route: Incorporate a buffer zone along the full length of the Site adjacent to the railway, of sufficient width to allow for a future cycleway and pedestrian route.
- 12) Servicing: Create a clear servicing strategy, including for van drop-offs and collections.
- 13) Community Space: Design community space to allow for a wide range of activities including residents' meetings, celebrations, training, events; do not locate at basement level.
- 14) Extra Care: Locate the extra care use in an optimal location for future residents following the principles of Design for Dementia; include outdoor space.
- 15) Shared Facilities: Ensure some on-site facilities are designed to provide overlaps between the different resident groups, workers and the wider community.

**05.3.3** The design principles set out in the SPD are intended to apply to the whole site, including land within RBKC and LBHF. No development quantum is specified and it is unclear what quantum of development is used as the basis for these design principles.

## **05.4 SITE DESIGNATIONS**

**05.4.1** The Application Site is subject to the following designations:

- / RBKC Site Allocation SA6: Lots Road South
- / The Site is allocated as a Locally Significant Industrial Site, however the GLA recognise that in light of the current non-industrial uses, it may be appropriate to remove the LSIS designation.
- / The Site lies within Flood Zones 2 and 3 and benefits from flood defences.
- / The Site is directly adjacent to The River Thames and tidal tributaries Site of Nature Conservation Importance.
- / The Site abuts the Thames Policy Area.
- / Chelsea Riverside Tier II Archaeological Priority Area.
- / PTAL Zones 3 and 4
- / A National Grid easement runs across the south-east corner of the Site, limiting tall buildings with deep foundations.
- / The Site is immediately adjacent to the Lots Village Conservation Area.
- / A small part of the Site is located in the Sands End Conservation Area, although no buildings are proposed within this area.
- / Within the Lots Road Employment Zone the Heatherley's School of Fine Art building directly abuts the Site's northern boundary.

## 05.5 THE LONDON PLAN

05.5.1 Outlined below is a list of relevant policies from the March 2021 London Plan:

- / Policy GG1 (Building strong and inclusive communities)
- / Policy GG2 (Making the best use of land)
- / Policy GG3 (Creating a healthy city)
- / Policy GG4 (Delivering the homes Londoners need)
- / Policy GG5 (Growing a good economy)
- / Policy GG6 (Increasing efficiency and resilience)
- / Policy SD10 (Strategic and local regeneration)
- / Policy D1 (London's form, character and capacity for growth)
- / Policy D2 (Infrastructure requirements for sustainable densities)
- / Policy D3 (Optimising site capacity through the design-led approach)
- / Policy D4 (Delivering good design)
- / Policy D5 (Inclusive design)
- / Policy D6 (Housing quality and standards)
- / Policy D7 (Accessible housing)
- / Policy D8 (Public realm)
- / Policy D9 (Tall buildings)
- / Policy D10 (Basement development)
- / Policy D12 (Fire safety)
- / Policy D13 (Agent of Change)
- / Policy D14 (Noise)
- / Policy H1 (Increasing housing supply)
- / Policy H4 (Delivering affordable housing)
- / Policy H5 (Threshold approach to applications)
- / Policy H6 (Affordable housing tenure)
- / Policy H10 (Housing size mix)
- / Policy H13 (Specialist older persons housing)
- / Policy S1 (Developing London's social infrastructure)
- / Policy S2 (Health and social care facilities)
- / Policy S4 (Play and informal recreation)
- / Policy S5 (Sports and recreation facilities)
- / Policy E1 (Offices)
- / Policy E2 (Providing suitable business space)
- / Policy E3 (Affordable workspace)
- / Policy E4 (Land for industry, logistics and services to support London's economic function)

- / Policy E6 (Locally Significant Industrial Sites)
- / Policy E7 (Industrial intensification, co-location and substitution)
- / Policy E11 (Skills and opportunities for all)
- / Policy HC1 (Heritage conservation and growth)
- / Policy HC3 (Strategic and Local Views)
- / Policy HC4 (London View Management Framework)
- / Policy HC5 (Supporting London's culture and creative industries)
- / Policy G1 (Green infrastructure)
- / Policy G4 (Open space)
- / Policy G5 (Urban greening)
- / Policy G6 (Biodiversity and access to nature)
- / Policy G7 (Trees and woodlands)
- / Policy G9 (Geodiversity)
- / Policy SI1 (Improving air quality)
- / Policy SI2 (Minimising greenhouse gas emissions)
- / Policy SI3 (Energy infrastructure)
- / Policy SI4 (Managing heat risk)
- / Policy SI5 (Water infrastructure)
- / Policy SI6 (Digital connectivity infrastructure)
- / Policy SI7 (Reducing waste and supporting the circular economy)
- / Policy SI8 (Waste capacity and net waste self-sufficiency)
- / Policy SI12 (Flood risk management)
- / Policy SI13 (Sustainable drainage)
- / Policy SI14 (Waterways – strategic role)
- / Policy SI16 (Waterways – use and enjoyment)
- / Policy SI17 (Protecting and enhancing London's waterways)
- / Policy T1 (Strategic approach to transport)
- / Policy T2 (Healthy Streets)
- / Policy T3 (Transport capacity, connectivity and safeguarding)
- / Policy T4 (Assessing and mitigating transport impacts)
- / Policy T5 (Cycling)
- / Policy T6 (Car parking)
- / Policy T6.1 (Residential parking)
- / Policy T6.2 (Office Parking)
- / Policy T6.5 (Non-residential disabled persons parking)
- / Policy T7 (Deliveries, servicing and construction)
- / Policy M1 (Monitoring)

## 05.6 RBKC NEW LOCAL PLAN REVIEW KEY POLICIES

05.6.1 Outlined below is a list of relevant policies from the Royal Borough of Kensington and Chelsea New Local Plan Review (July 2024):

### Site Allocations (SA):

- / Policy SA6 (Lots Road South)

### Green-Blue Future (GB):

- / Policy GB1 (Sustainable Retrofitting)
- / Policy GB2 (Circular Economy)
- / Policy GB3 (Whole Life-cycle Carbon)
- / Policy GB4 (Energy and Net Zero Carbon)
- / Policy GB5 (Overheating)
- / Policy GB6 (Air Quality)
- / Policy GB7 (Construction Management)
- / Policy GB8 (Noise and Vibration)
- / Policy GB9 (Odour)
- / Policy GB10 (Light Pollution)
- / Policy GB11 (Flood Risk)
- / Policy GB12 (Sustainable Drainage)
- / Policy GB13 (Water and Wastewater Infrastructure)
- / Policy GB14 (Green and Blue Infrastructure)
- / Policy GB15 (Parks, Gardens and Open Spaces)
- / Policy GB16 (Trees)
- / Policy GB17 (Waste Management)
- / Policy GB18 (Contaminated Land)

### Homes (HO)

- / Policy HO1 (Delivery and Protection of Homes)
- / Policy HO3 (Community Housing)
- / Policy HO4 (Housing Size and Standards)
- / Policy HO5 (Specialist Housing)

### Conservation and Design (CD):

- / 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 CD6 (Scheduled Monuments and Archaeology)
- / Policy CD7 (Registered Parks and Gardens of Special Historic Interest)
- / Policy CD8 (Tall Buildings)
- / Policy CD9 (Living Conditions)
- / Policy CD11 (Basements)
- / Policy CD15 (Views)
- / Policy CD16 (Fire Safety)

Town Centres (TC):

- / Policy TC1 (Location of New Town Centre Uses)
- / Policy TC5 (Local Shopping and other Facilities)
- / Policy TC7 (Arts and Cultural Uses)

Business (BC):

- / Policy BC1 (Business Uses)
- / Policy BC2 (Creative and Cultural Businesses)
- / Policy BC3 (Affordable Workspace)

Social Infrastructure (SI):

- / Policy SI1 (Social Infrastructure and Facilities)

Transport (TR):

- / Policy TR1 (Street Network)
- / Policy TR2 (Three-dimensional Street Form)
- / Policy TR3 (Living Streets and Outdoor Life)
- / Policy TR4 (Streetscape)
- / Policy TR5 (Land Use and Transport)
- / Policy TR6 (Active Travel)
- / Policy TR7 (Public Transport)
- / Policy TR8 (Car Parking)
- / Policy TR9 (Servicing)

Infrastructure and Planning Contributions (IP):

- / Policy IP1 (Infrastructure Delivery and Planning Contributions)

## 05.7 LBHF LOCAL PLAN KEY POLICIES

05.7.1 Outlined below is a list of relevant policies from the London Borough of Hammersmith and Fulham Local Plan (February 2018):

### Regeneration Area Strategies

- / Policy SFRRA (South Fulham Riverside Regeneration Area)
- / Policy SFRRA1 (Imperial Gasworks National Grid)

### Housing

- / Policy HO1 (Housing Supply)
- / Policy HO3 (Affordable Housing)
- / Policy HO4 (Housing Quality and Density)
- / Policy HO5 (Housing Mix)
- / Policy HO6 (Accessible Housing)
- / Policy HO7 (Meeting Needs of People who Need Care and Support)
- / Policy HO11 (Detailed Residential Standards)

### Local Economy and Employment

- / Policy E1 (Providing for a Range of Employment Uses)
- / Policy E2 (Land and Premises for Employment Uses)
- / Policy E3 (Provision for Visitor Accommodation and Facilities)
- / Policy E4 (Local Employment, Training and Skills Development Initiatives)

### Town and Local Centres

- / Policy TLC4 (Small Non Designated Parades, Clusters and Corner Shops)

### Community Facilities, Leisure and Recreation

- / Policy CF1 (Supporting Community Facilities and Services)
- / Policy CF2 (Enhancement and Retention of Community Uses)
- / Policy CF3 (Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sport Uses)

### Green and Public Open Space

- / Policy OS1 (Parks and Open Spaces)
- / Policy OS2 (Access to Parks and Open Spaces)
- / Policy OS3 (Playspace for Children and Young People)
- / Policy OS4 (Nature Conservation)
- / Policy OS5 (Greening the Borough)

### River Thames

- / Policy RTC1 (River Thames)
- / Policy RTC2 (Access to the Thames Riverside and Foreshore)
- / Policy RTC3 (Area and Appearance of Development within the Thames Policy Area)
- / Policy RTC4 (Water-based Activity on the Thames)

### Design and Conservation

- / Policy DC1 (Built Environment)
- / Policy DC2 (Design of New Build)
- / Policy DC3 (Tall Buildings)
- / Policy DC7 (Views and Landmarks)
- / Policy DC8 (Heritage and Conservation)
- / Policy DC11 (Basements and Lightwells)

### Environmental Sustainability

- / Policy CC1 (Reducing Carbon Dioxide Emissions)
- / Policy CC2 (Ensuring Sustainable Design and Construction)
- / Policy CC3 (Minimising Flood Risk and Reducing Water Use)
- / Policy CC4 (Minimising Surface Water Run-Off with Sustainable Drainage Systems)
- / Policy CC5 (Water Quality)
- / Policy CC6 (Strategic Waste Management)
- / Policy CC7 (On-site Waste Management)
- / Policy CC9 (Contaminated Land)
- / Policy CC10 (Air Quality)
- / Policy CC11 (Noise)
- / Policy CC12 (Light Pollution)

### Transport

- / Policy T1 (Transport)
- / Policy T2 (Transport Assessments and Travel Plans)
- / Policy T3 (Increasing and Promoting Opportunities for Cycling and Walking)
- / Policy T4 (Vehicle Parking Standards)
- / Policy T5 (Parking for Blue Badge Holders)
- / Policy T6 (Borough Road Networks – Hierarchy of Road)
- / Policy T7 (Construction and Demolition Logistics)

## 05.8 SUPPLEMENTARY PLANNING GUIDANCE

**05.8.1** RBKC's Local Plan includes the following Supplementary Planning Documents which are of relevance to the scheme.

- / Lots Road Development Brief SPD (July 2022)
- / Elderly Persons' Accommodation SPG (Adopted April 2004)
- / Access Design Guide SPD (Adopted 17 December 2010)
- / Air Quality SPD (Adopted 17 June 2009)
- / Basements SPD (Adopted 14 April 2016)
- / Community Housing SPD (Adopted 3 June 2020)
- / Designing Out Crime SPD (Adopted January 2008)
- / Greening SPD (Adopted 9 June 2021)
- / Noise SPD (Adopted 21 May 2009)
- / Transport and Streets SPD (Adopted 20 April 2016)
- / Trees and Development SPD (Adopted 14 June 2023)
- / Planning Contributions SPD (Adopted 18 September 2019)

**05.8.2** LBHF's Local Plan includes the following Supplementary Planning Documents which are of relevance to the scheme.

- / Planning Guidance SPD (Adopted February 2018)
- / Climate Change SPD (Adopted October 2023)
- / Affordable Workspace SPD (Adopted October 2022)

## 06. PLANNING CONSIDERATIONS

### 06.1 PLANNING CONSIDERATIONS

- 06.1.1** The following chapter assesses the Application Scheme against the adopted and emerging planning policy framework and all other relevant material considerations. Section 38 (6) of the Planning and Compulsory Purchase Act (2004) states that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise. The Development comprises the London Plan, RBKC Plan and LBHF Plan.

### 06.2 MAKING EFFECTIVE USE OF LAND

#### Planning Policy

- 06.2.1** All levels of planning policy seek to ensure the effective use of land in order to meet the urgent need for new homes and other uses. Policy places a priority on making as much use as possible of previously developed or brownfield land.

- 06.2.2** The Government has been clear in its objective to deliver 1.5 million new homes over the next 5 years as part of its Plan for Change. National, strategic and local levels of planning policy are all clear in their support for the redevelopment of brownfield sites such as Lots Road South. This was echoed by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government in her first Ministerial Statement on 30th July 2024 which stated:

*“The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes...”*

- 06.2.3** This strong support for the redevelopment of brownfield sites was enshrined in the December 2024 revisions to the NPPF. Paragraph 125c states planning policies and decisions should:

*“...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”*

- 06.2.4** London Plan Policy GG2 (Making the best use of land) requires development proposals to prioritize the efficient use of land by enabling the development of brownfield sites. Proposals should explore the potential to intensify land use to support additional homes and workspaces, promoting higher density developments in locations accessible by public transport, walking, and cycling. A design-led approach should be applied to determine the optimal development capacity of sites, considering local context and community value.

**06.2.5** The London Plan expands on these objectives to develop underutilised brownfield sites. Policy H1 'Increasing Housing Supply' requires Boroughs to '*optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity.*

**06.2.6** Policy D3 of the London Plan states that:

*A - All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the Site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth...*

*B - Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.*

**06.2.7** RBKC Policy SA6: Lots Road South supports a high-quality, employment-led mixed-use development comprising approximately 100 new residential units, 65 affordable extra care units, and around 4,000 sqm of commercial floorspace, on the RBKC part of the Site.

#### Application Scheme

**06.2.8** The Application Scheme aligns with these policy requirements for the following reasons:

- / At present the Site is a substantial under-utilised brownfield site. The proposed development accords with national, regional, and local planning policies that prioritise the redevelopment of brownfield land to meet the urgent need for housing.
- / The Site is the subject of a site allocation, RBKC SA6 (Lots Road South). The proposals deliver a high-quality mixed-use scheme including new homes, affordable extra care units, and commercial floorspace. The Site is also subject to a site-specific design brief SPD.
- / The proposed development will deliver greater employment density and encourage uses that are aligned with the other uses on Lots Road.
- / The Site's redevelopment contributes to housing delivery through intensified land use in an accessible location. The development uses a design-led approach to optimize the Site capacity, with refined building layouts maximize internal space efficiency and dual-aspect homes, while also maximising the public realm at the ground level, ensuring high-density living is balanced with quality public spaces.

- / The Site is currently partially vacant, with the Lots Road action house permanently moving to new premises on Carnwath Road in LBHF. The RBKC car pound and highways dept on the Site will all be moved to alternate sites within RBKC prior to development commencing.

**06.2.9** The above topics are examined in greater detail in this planning pack, but the application site has significant potential to accommodate sustainable high density mixed-use scheme on an allocated brownfield site in accordance with these policy objectives.

Supporting Information

**06.2.10** Please see the following documents submitted in support of this planning application for further details:

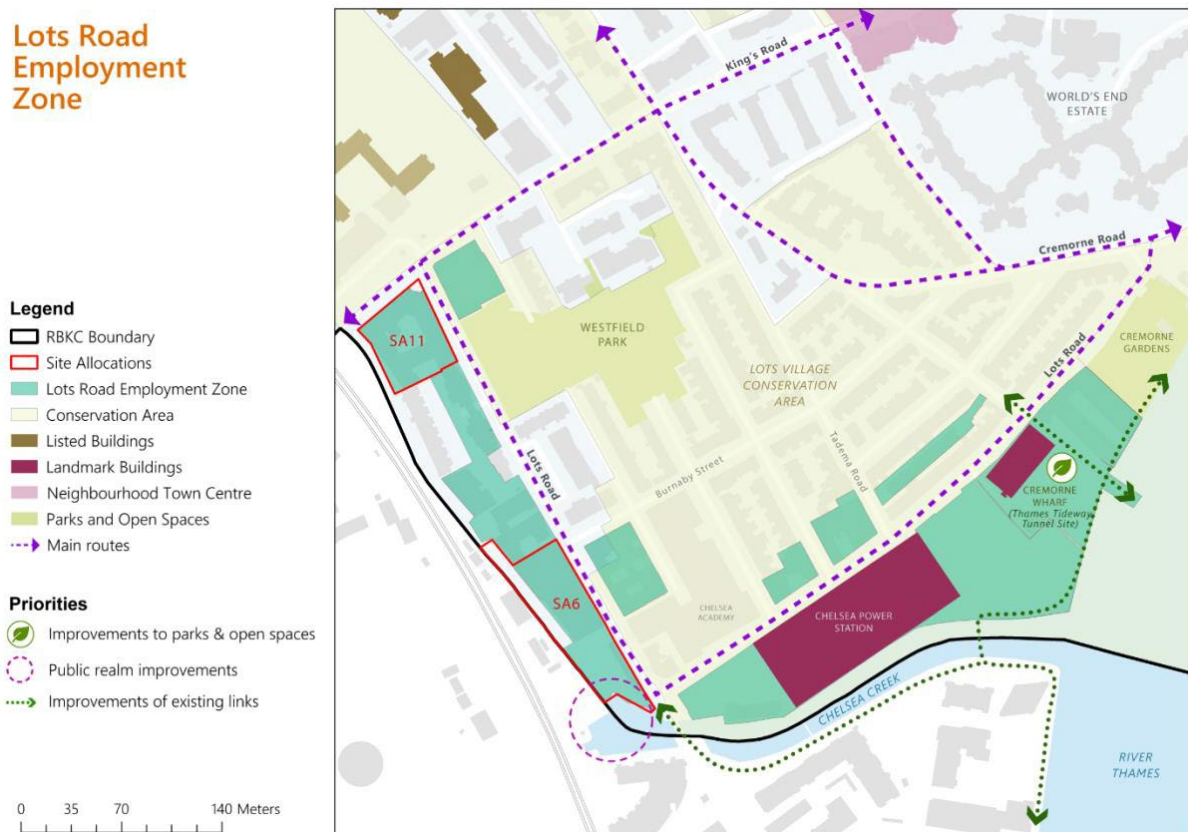
- / LR11 Design and Access Statement (PRP)

## 06.3 EMPLOYMENT

### Allocated Employment Uses Policy

**06.3.1** The RBKC Local Plan identifies the Lots Road Employment Zone, which includes the Lots Road South site, as well as the area directly to the north and east along Lots Road. The Employment Zone contains a cluster of antiques and art-related firms focused on the Bonhams and Lots Road auction houses, as well as designers and business services typically associated with the creative industries. There has been a recent emergence of interior design and business services in the area reinforced by the Design Centre nearby in LBHF.

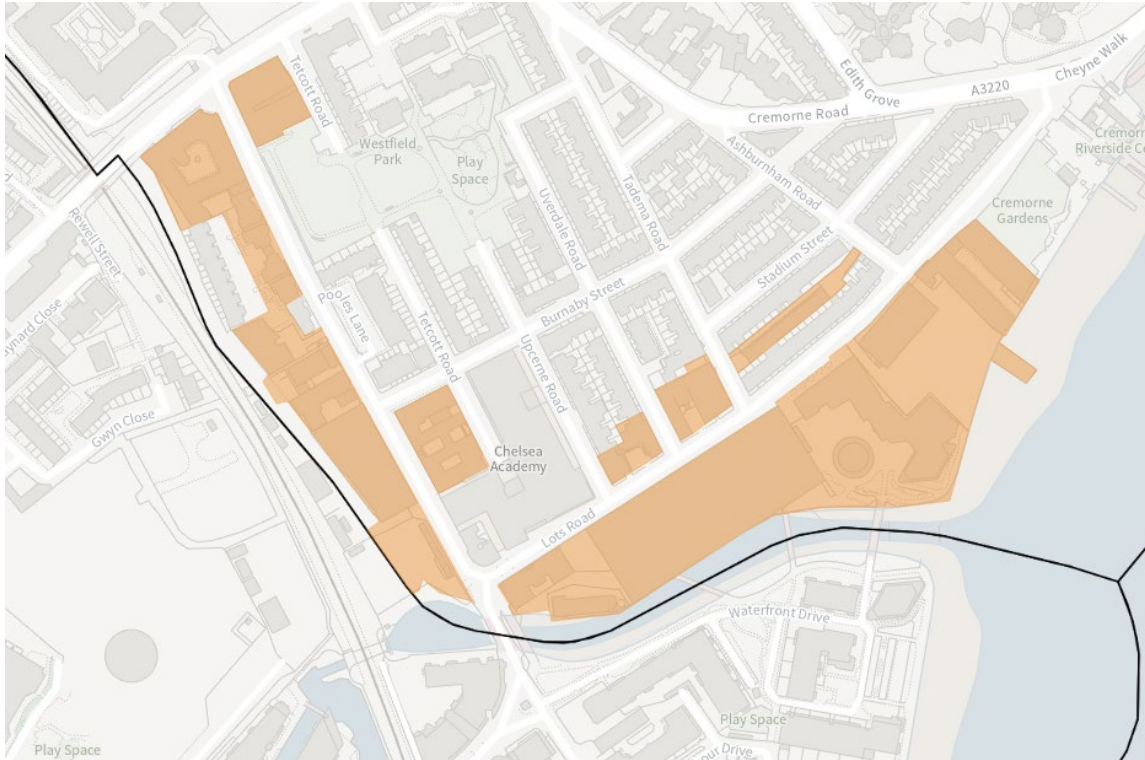
### Lots Road Employment Zone



Extract from RBKC Local Plan Figure 2.7

- 06.3.2** Paragraph 2.49 of the supporting text states that the SA6 Lots Road South redevelopment provides an opportunity to create additional, more modern commercial space to the Employment Zone, as well as co-locating residential uses to optimise the Site with a vibrant mix of uses.
- 06.3.3** RBKC Policy BC1 (Business uses) promotes employment zones as centres for innovation, locations for large and small businesses and workshops. Part J of the policy supports the creation of residential floorspace where it results in a significant uplift in both the quantity and the quality of the business uses on site.
- 06.3.4** RBKC Policy PLV7 (Lots Road Employment Zone) states that the Employment Zone will provide improved and additional workspaces and facilities for innovative and creative small and medium sized businesses with a

focus on art, architecture, antiques and interior design. To make the best use of land, complementary uses that contribute to the area's eclectic mix and character will be incorporated. This allocation means that the Site falls under the London Plan Policy E6 definition of a Locally Significant Industrial Site ('LSIS').



*Extract of LSIS layer from the GLA planning datamap, confirming the LSIS designation for the Lots Road Employment Zone*

**06.3.5** It is worth noting that there is some discrepancy with RBKC's definition of a Local Employment Area. In the GLAs Regulation 18 response to RBKC's draft local plan, the GLA highlighted this discrepancy and suggested that the GLA and RBKC work together to review these areas and potentially remove the LSIS designation where it is shown that these areas are in predominantly non-industrial use.

**06.3.6** RBKC Policy SA6 (Lots Road South) identifies that the Lots Road South site sits within the Lots Road Employment Zone. The Site is allocated for high-quality mixed-use development that is employment led, to include residential and employment floorspace. Part D of the policy specifies that this is to include:

*'Around 4,000 sq m (GIA) of commercial floorspace (Class E and B8) of which at least 3,000 sq m will be business floorspace (Class E(g) office, research and development or light industrial or B8 storage or distribution)'.*

**06.3.7** Part F of the policy states that the existing auction house use (sui generis) should be retained in addition to the floorspace specified in part D. Part G of the policy states that the character should be employment use led, informed by end user needs incorporating flexibility, opportunities for collaboration and practical needs.

**06.3.8** The LBHF Local Plan does not allocate the Site for any uses, the planning policy map includes the Lost Road South site as 'white space' meaning that general employment policy applies, but there are no site-specific policies to take account of.

#### General Employment Planning Policy

**06.3.9** London Plan Policy GG5 (Growing a good economy) focuses on ensuring that London's economic success is more equitably shared by promoting diversification across sectors and locations. It calls for the planning of sufficient employment and industrial space in appropriate areas to support both economic development and regeneration. The policy also emphasises the need to deliver adequate high-quality, affordable housing and the physical and social infrastructure necessary to support sustainable economic growth across the city.

**06.3.10** London Plan Policy E1 (Offices) seeks to retain existing viable office capacity in areas outside the designated locations identified in Part C of the policy, thereby supporting a dispersed provision of office space across the capital and preventing unnecessary loss of functioning office stock.

**06.3.11** London Plan Policy E2 (Providing suitable business space) aims to ensure that there is an adequate supply of business space across London to meet current and future demand, with a focus on space falling within the B use class. The policy supports the retention, enhancement, and provision of high-quality and affordable space, particularly in locations with good public transport accessibility. Redevelopment of existing floorspace should only be permitted where it can be demonstrated that there is no reasonable prospect of its continued use for business purposes and that the loss would not compromise local economic function. The intensification of business uses, including through the introduction of multi-storey schemes and co-location with other compatible uses, is encouraged where appropriate. The policy also supports the provision of flexible and low-cost employment space to meet the needs of start-ups, SMEs, and other small businesses, particularly in areas with identified shortfalls.

**06.3.12** London Plan Policy E4 (Land for industry, logistics and services to support London's economic function) seeks to safeguard and intensify land for industrial, logistics, and services critical to London's economy, ensuring that sufficient industrial floorspace capacity is retained and enhanced to meet current and future demand. The policy requires boroughs to plan proactively for industrial land, protect Locally Significant Industrial Sites LSIS, and resist changes of use unless it is part of a coordinated industrial intensification or co-location plan.

**06.3.13** London Plan Policy E6 (Locally Significant Industrial Sites) protects industrial capacity on sites identified as locally significant by boroughs, based on evidence of local economic and industrial land need. The policy supports continued industrial uses and encourages intensification of industrial activities where possible.

**06.3.14** London Plan Policy E7 (Industrial intensification, co-location and substitution) states that development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8. Consolidation of identified LSIS to support the delivery of residential and other uses can be supported as part of a plan-led proposal where the criteria in Part D of the policy are met. This requires that the proposed development must ensure that existing industrial activities on-site and in the surrounding area remain fully operational, with uninterrupted access, servicing, and 24/7 use. Intensified industrial, storage, and distribution

uses must be completed prior to residential occupation. Any residential element must be appropriately designed to mitigate conflicts, addressing safety, security, layout, access, servicing, amenity, agent of change principles, and impacts from noise, vibration, air quality, and potential contamination.

- 06.3.15** RBKC Policy BC1 (Business Uses) focuses on supporting and promoting employment uses within the borough, particularly in designated Employment Zones. It safeguards existing business floorspace, resists its loss to non-business uses, and encourages new business development to maintain economic diversity. The policy seeks to accommodate a range of business sizes, especially small and medium-sized enterprises (SMEs), and supports modernisation and intensification where appropriate, provided the amenity of surrounding uses is not harmed and the character of the area is respected.
- 06.3.16** RBKC Policy BC2 (Creative and Cultural Businesses) seeks to safeguard existing creative and cultural floorspace and resist its loss, except in exceptional circumstances. The policy encourages the provision of affordable workspace, supports flexible working arrangements, and aims to strengthen the borough's identity as a centre for creative industries. New developments are expected to incorporate creative space where viable.
- 06.3.17** LBHF Policy E1 (Providing for a Range of Employment Uses) states that the council will support proposals including mixed use schemes for new employment uses. The council will also support the retention, enhancement, and intensification of existing employment uses. It will require flexible and affordable space suitable for small and medium enterprises in large new business developments,
- 06.3.18** LBHF Policy E2 (Land and Premises for Employment Uses) states that the council will require the retention of land and premises capable of providing continued accommodation for employment or local services. Permission will only be granted for a change where (1) continued use would adversely impact on residential areas; or (2) an alternative use would give a demonstrably greater benefit that could not be provided on another site; or (3) it can be evidenced that the property is no longer required for employment purposes.

#### Affordable Workspace Policy

- 06.3.19** London Plan Policy E3 (Affordable workspace) states that planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development. This can include provision for specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace.
- 06.3.20** RBKC Policy BC3 (Affordable Workspace) states that new developments that provide an uplift of more than 5,000 sq m (GIA) of Class E(g) business floorspace must provide affordable workspace, equating to 10 per cent of the additional employment floorspace (GIA).
- 06.3.21** LBHF Policy E1 (Providing for a Range of Employment Uses) states in the supporting text that applications for new business development schemes will be expected to provide affordable workspace. Successful working of affordable workspace will require an understanding of the occupant and the type of space required. Therefore, the council will expect developers to engage with workspace providers in order to manage the space and/or to identify the future occupants of the space.

Current Employment Provision on Lots Road South

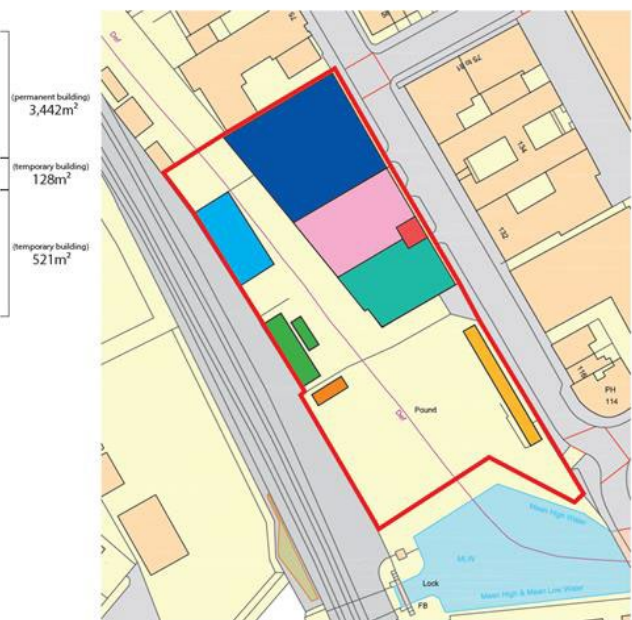
**06.3.22** The existing employment provision on the Lots Road South site comprises a mix of permanent and temporary uses spread across warehouse buildings, portacabins, and open yard spaces, split between RBKC and LBHF.

**06.3.23** Permanent facilities include the now-vacant Lots Road Auction House (Use Class sui generis), self-storage (Use Class B8), and office/studio space (Use Class E) at Fairbank Studios. These provide a range of workspace types, including showrooms for interior design and antique businesses such as Ed Butcher, Whistler Leather, and Aura. The total permanent commercial floorspace is 3,442 sq.m (GIA), all located within RBKC.

**06.3.24** Temporary uses include a vehicle car pound, street maintenance depot, portacabins used by recycling contractors, and a salt store, largely concentrated in the LBHF portion of the Site. These structures add a further 649 sq.m of gross internal area, with many in low-quality condition. The total site-wide commercial provision thus amounts to 4,091 sq.m of GIA, combining both permanent and temporary elements. The Site also provides operational access for RBKC’s highways depot and includes outdoor areas used by the adjacent Heatherley School of Fine Art, adding to the mixed employment and service nature of the current provision. Overall, the Site reflects a transitional and low-intensity employment landscape with a variety of uses, some of which are no longer active or functionally obsolete.

**06.3.25** The following table summarises the existing uses and how this falls between RBKC and LBHF boroughs:

Existing GIA areas:	RBKC	LBHF
Auction House - Sui Generis	1,564m <sup>2</sup>	
Access Self Store - Storage - B8	1,183 m <sup>2</sup>	
Access Self Store - Fairbank studios - E(g)(i) Offices	504m <sup>2</sup>	
Access Self Store - Ground floor showrooms - Retail E(a)	191m <sup>2</sup>	
Car pound portacabins 1 - Sui Generis	128m <sup>2</sup>	
Car pound portacabins 2 - Sui Generis		63m <sup>2</sup>
Open sided Salt Store - Class B8		265m <sup>2</sup>
Suez recycling portacabins 1 - Class Eg(i)		138m <sup>2</sup>
Suez recycling portacabins 2 - Class Eg(i)		55m <sup>2</sup>
<b>TOTAL</b>	<b>3,570m<sup>2</sup></b>	<b>521m<sup>2</sup></b>



**06.3.26** The existing site is currently underutilized and accommodates a mix of temporary and permanent commercial facilities. These include Access Self Store, Fairbank Studios, a car pound, temporary cabins, and the Council’s highway service depot, which is in the process of being relocated. The Site previously hosted Lots Road Auctions, which moved off-site in March 2024. The area is characterized by a fragmented built form, inactive

frontages, and limited public access, with the Site being largely fenced off from the surrounding context and offering minimal contribution to the public realm or streetscape.

- 06.3.27** Many of the existing structures are modest brick warehouse buildings or utilitarian commercial units, which are not optimised for contemporary commercial needs or integration with residential development.
- 06.3.28** Design testing has demonstrated that retaining these buildings would significantly constrain development potential. The configuration and footprint of the buildings prevent the efficient layout of new development, particularly for residential and extra care housing. Consequently, comprehensive redevelopment is proposed to optimise land use and ensure policy compliance.

#### Lots Road Auction House

- 06.3.29** RBKC Policy SA6 (Lots Road South) Part F states that the existing auction house use (sui generis) should be retained in addition to the floorspace specified in part D.
- 06.3.30** Mount Anvil have been in discussions with Lots Road Auction House about a return to the proposed scheme since May 2023, noting that it is inevitable that the business would have to move on a temporary basis to facilitate construction works. Lots Road Auction House confirmed to Mount Anvil in March 2024 that they have found new premises. The following message has been provided on their website:

*'In March 2024 we moved from Lots Road Chelsea to the iconic Piper Centre in Fulham. This incredible space, spanning almost 30,000 square feet, makes us one of the largest single site auction houses in the country.*

*This mid-century modernist building was constructed in the 1950s for the North Thames Gas Board and was originally named Watson House. The heavy use of concrete was enveloped into its design, with the material being showcased as a design aesthetic which was popular during in the era and the Brutalist movement.*

*Huge spiral murals were commissioned by prominent artist John Piper illustrating the theme of 'The Spirit of Energy' which remain in pride of place today.*

*By the 1990s, a decade after the Gas Board had left the premises, the building was earmarked for demolition, however, with the building's huge potential, it was redeveloped by Baylight with the ground floor being used as commercial premises and above it a five-storey luxury apartment block.*

*The impressive building, featuring its vibrant and trademark 'John Piper Yellow' electric sun blinds is visible from the Wandsworth Bridge and is an iconic London landmark.*

*Lots Road Auctions is delighted to be woven into the rich history of this building and look forward to welcoming you to our showroom.'*

- 06.3.31** The Piper Building has an area of 2,740 sqm GIA over a single floor, approximately double what the current facilities offer at Lots Road. The Lots Road Auction House have confirmed that they intend to permanently occupy the Piper Building and have no plans to return to Lots Road at their previous scale, however they may wish to occupy a much smaller commercial unit of up to 325 sqm for the display and sale of goods. This is unlikely to be confirmed in the short term, but would likely fall under use class E(a) for the display or retail sale of goods rather than sui generis.
- 06.3.32** Notwithstanding that an auction house was formerly a use on site, there is no justification in policy terms advanced for its required retention or re-provision through the re-development of the SA6 site. The future need for an auction house premises is dependent upon the business owners wishing to return and as a relatively niche economic activity it is unlikely (and is also un-evidenced) that an alternative auction house operator may choose to come to the Site if the existing operator chooses not to return.
- 06.3.33** Furthermore, auction houses have a particular operational characteristic in terms of the need for significant on-site storage space and logistical arrangements that result in this land use activity requiring a bespoke arrangement of floorspace that may not be suitable or flexible for other businesses to occupy if an auction house occupier was not found.
- 06.3.34** Policy SA6 requirement for the retention of the existing auction house use is therefore not wholly consistent with Policy SA6 at criterion Part G, which states that the character should be employment use led, informed by end user needs incorporating flexibility, opportunities for collaboration and practical needs.
- 06.3.35** In light of Lots Road Auction House confirming that they do not intend to return to the Site, the Application Scheme is not proposing to provide a dedicated, bespoke sui generis auction house space and will instead provide use class E(a), (b) and (g) flexible commercial space. The proposed provision is set out in more detail below.

#### Employment Needs

- 06.3.36** From the outset of the project the Applicant has sought to understand what the market and commercial demand are for the proposed commercial provision to ensure that it is appropriate to meet the needs of potential occupiers and will be let. The full details of this are set out in the submitted LR15 Commercial Report.
- 06.3.37** The local employment market surrounding Lots Road South shows clear patterns that shape what types of commercial provision are viable and in demand for the proposed development. The surrounding area supports a vibrant but highly localised economy, centred on small-scale, flexible, and high-quality commercial spaces. This includes boutique offices, design studios, and showrooms for wholesalers, retailers, and design consultancy as well as other spaces for the creative industry. The Design Centre has a significant influence on commercial uses in the area and it includes an element of the ground floor of the Lighterman Tower development, opposite the Site. Workspaces around the Site are typically under 500 sq.ft., operated on short-term leases, and occupied by SMEs and micro-businesses in design, media, and technology sectors. World's End Studios, Chelsea Wharf, and Fairbank Studios exemplify the type of premises that have seen consistent

occupancy and sustained demand. Local office vacancy rates are rising across Kensington and Chelsea, but this is tied to demand for quality and flexibility, not an overall drop in need.

- 06.3.38** There is almost no traditional light industrial or logistics provision within the immediate 0.5–1 mile catchment, especially on the RBKC side. Where industrial space is available (e.g., Bloom Fulham or Talina Centre in LBHF), it is often rebranded and refurbished to appeal to modern requirements such as last-mile logistics or ‘maker’ uses. Demand exists for flexible commercial units that can accommodate creative production, hybrid working, or light manufacturing but the borough’s planning and market context limit viable provision of traditional B2/B8 uses.
- 06.3.39** Demand for co-working, managed offices, and hybrid flex space has increased, accelerated by remote work shifts and local residential growth. Operators in the area, such as Huddle, Homework Workspace, and LetReady, demonstrate that occupiers increasingly prioritise short-term access to turnkey units with amenities. This preference aligns with the existing local commercial DNA and is forecast to continue.
- 06.3.40** Creative sector clustering is a distinctive strength. The area lies at the intersection of the Chelsea Design Quarter and Hammersmith & Fulham’s “TV Triangle,” attracting design, media, and digital businesses. Demand for studios, showrooms, and affordable co-located creative space, especially with modest, industrial aesthetics, is robust.
- 06.3.41** Based on this evidence, commercial provision in the proposed development should prioritise flexible Use Class E units, which can be let as single units or subdivided, suited to the type of occupiers already clustered around the Design Centre as well as other creative industries and professional services. Provision for affordable commercial space will enhance inclusivity and support startup growth. Integration of a ceramics studio and gallery in the proposed scheme will further strengthen an on-site ecosystem and reinforce the relationship with the adjacent Heatherley School of Fine Art. The inclusion of gallery and arts space, and flexibility in use classes (E(a)(b)(g)), directly meets the area’s prevailing employment structure and planning policy direction. The offer should avoid heavy industrial or large-format office use, and instead mirror local supply: flexible, adaptable, and creative.

#### Definition of Employment Led

- 06.3.42** We recognise that RBKC Policy SA6 (Lots Road South) allocates the Site for high-quality mixed-use development that is employment led, however the SA6 policy is not clear as to how ‘employment led’ is defined. It cannot mean that the majority of floorspace should be a traditional ‘employment use’ in town planning terms, or even that employment uses should provide more floorspace than any other single use. This seems clear given that the SA6 policy seeks a range of land uses as part of a mixed use scheme and the 3,000 sqm GIA of business floorspace would make up just 15% of the total GIA of a scheme that was policy compliant in terms of land use terms. Residential uses on the other hand make up 78% of the GIA of a policy complaint scheme in land use terms. The table below demonstrates how much floorspace is needed to deliver each of the key SA6 land use targets.

SA6 Targets	GIA (sqm )	% of SA6 Floorspace
65 Extra Care Units	6,163	32%
100 Residential (C3) units	9,040	46%
Auction House Use	325	2%
1,000 sqm commercial floorspace	1,000	5%
3,000 sqm business floorspace	3,000	15%
<b>Total</b>	<b>19,528</b>	<b>100%</b>

**06.3.43** The Design and Access Statement also demonstrates that a scheme which provided the land use requirements of SA6 on the land to which the policy applies (within the RBKC administrative boundaries only) would not be capable of also complying with the other strands of the SA6 policy in terms of design or the Lots Road South Design Brief SPD.

**06.3.44** Policy SA6 seeks:

*'Around 4,000 sq m (GIA) of commercial floorspace (Class E and B8) of which at least 3,000 sq m will be business floorspace (Class E(g) office, research and development or light industrial or B8 storage or distribution).'*

**06.3.45** It is unclear how the scale and quantum of commercial space within Policy SA6 was determined, and there is no clear link for the level of such floorspace provision set out in the Plan within the available evidence base.

**06.3.46** Paragraph 4.5 of the RBKC *'Leadership Team Meeting: Approval to Progress Proposals for Council Owned Land in the Lots Road Area'* (1st November 2021), points towards the decision on the future commercial floorspace at Lots Road South being based on previous Site Allocation Policy CA7, stating:

*'The proposed commercial floorspace quantum and residential units coming forward are based on the Site allocation (Policy CA7) in the adopted Local Plan (September 2019).'*

**06.3.47** The justification for the level of employment floorspace originally set out in site allocation Policy CA7 was itself lacking. Indeed, there is little clarity within the adopted Plan as to why the Site allocation set the quantum of floorspace that it did and whether this was effectively tested or evaluated in commercial market and viability terms at that time. Those concerns remain as former site allocation CA7 has been rolled forward to become Policy SA6.

**06.3.48** The employment and commercial land evidence underpinning the Royal Borough of Kensington and Chelsea's (RBKC) employment policy, particularly as it relates to the borough's Employment Zones, demonstrates a strategic focus on protecting and enhancing distinct clusters of economic activity suited to the borough's constrained and highly urbanised geography. The three Employment Zones, Kensal, Latimer Road, and Lots Road, serve different but complementary functions. Kensal is RBKC's primary general employment location with capacity for intensification; Latimer Road functions as a creative industries cluster with potential for managed workspace and light industrial activity; and Lots Road is distinguished by its niche offer as a base for small-scale, design-focused and creative sector businesses, including showroom and studio spaces.

**06.3.49** The purpose of the Lots Road Employment Zone (LREZ) is to retain and reinforce this distinctive character, rooted in adaptive reuse of former industrial buildings for creative enterprises, and to support economic activities that complement the adjacent Chelsea Design Quarter. The commercial land evidence, including RBKC’s Employment Land Study (2021) and Annual Monitoring Reports (2022–2024), shows that the area lacks traditional industrial or logistics stock, but holds persistent demand for small, flexible, high-quality office and studio space. LREZ is not considered a conventional industrial location; instead, it is recognised for its role in supporting SMEs, micro-businesses, and creative professionals in bespoke premises. The employment policy aim is to resist further erosion of such spaces, particularly given historical losses to residential conversions. The ELS does not however undertake a site supply review or assessment and does not therefore provide granular detail or significant evaluation of the Lots Road South site or its future potential contribution. The ELS evidence simply does not provide the basis for justifying the future employment and commercial requirements for Policy SA6 beyond its support for the retention of employment generating land use activities in the LREZ.

**06.3.50** It appears that the level of commercial employment floorspace allocated by SA6 of ‘*Around 4,000 sq m (GIA) of commercial floorspace (Class E and B8) of which at least 3,000 sq m will be business floorspace (Class E(g) office, research and development or light industrial or B8 storage or distribution)*’, plus the retention of the Auction House is primarily based on the existing non-residential floorspace of 4,091 sq.m of GIA, but without any further detailed review, testing or evaluation as to whether that quantum is justified or appropriate for the Site in the context of viability in the market or the Plan’s employment land evidence base.

Application Proposals

**06.3.51** The proposed development will deliver 2,038 sqm of non-residential floorspace, comprising a range of employment and community uses. The proposals have been influenced by economic conditions, including market demand, and challenging scheme viability, details of this are set out in the LR15 Commercial Report and LR39 Financial Viability Assessment.

**06.3.52** Overall, the non-residential areas are as follows:

Use Class	Space	GIA + BOH (sqm)
F2	Community Centre	274.3
F1(a)(b)	Ceramics studio & Art Gallery	107.9
E(g)	Affordable Commercial Space	684.3
E(a) E(b)	Café	143
E(a)	Commercial A	83.9
E(a)	Commercial D	448.5
E(a)	Commercial E	296.3
<b>Total</b>		<b>2038.2</b>

**06.3.53** Flexibility is sought in the open market ‘Flexible Commercial Space’ category above, so that all of it could come forward as E(g), or some of it could come forward as E(a) or E(b), with the rest as E(g). Below describes the “up to” limits for each use. Part of the E(a) space could facilitate the return of the Lots Road Auction House to the scheme in a new format.

Use Class	Space	GIA + BOH (sqm)	Notes
F2	Community Centre	274.3	Area is an 'Up to' number and subject to deductions depending on take up for E(a) and E(b)
F1(a)(b)	Ceramics studio & Art Gallery	107.9	This would be in either Block A (unit facing the creek) or Block E
E(g)	Affordable Commercial Space	684.3	This would be in either Block E or Block D (not in the unit next to the Art School)
E(a)(b)(g)	Flexible Commercial Space	971.7	
<b>TOTAL</b>		<b>2038.2</b>	

**06.3.54** The proposed market commercial provision has been developed in direct response to identified local market conditions due to its emphasis on flexible and adaptable, Use Class E floorspace, providing high quality units which can be let as single units or subdivided. These are designed to be attractive to a range of occupiers including the type of occupiers already clustered around the Design Centre as well as other creative industries and professional services. A distinctive café, as well as retail (including artisan retail) could also be enabled, responding to the feedback from the local community. The development avoids incompatible large-format or industrial uses and instead reinforces the area's established role within the Chelsea Design Quarter and broader creative economy. By accommodating units in a range of formats, the scheme directly responds to occupier expectations for flexibility, sustainability, and characterful premises supporting both existing demand and the borough's strategic economic priorities.

#### Affordable Commercial space

**06.3.55** A key element of the non-residential offer is the provision of 684.3 sqm of affordable commercial space. This is integrated into the ground floor layout and located prominently to encourage visibility and engagement with the wider community.

**06.3.56** This workspace will be leased back to the Royal Borough of Kensington and Chelsea as part of its social investment objectives, ensuring that it remains accessible to local enterprises and organisations that deliver community benefit.

**06.3.57** The proposal includes affordable commercial space which is not strictly affordable workspace in policy terms as it does not meet the standard definition which requires 10% of floorspace at 50% market rent, in RBKC. It instead proposes a significantly larger proportion of affordable workspace: 41% of the total E-class commercial floorspace at a 20% discount to market rent. The area is not identified in policy as somewhere that is a focus for affordable workspace and neither is the area characterised by high or unaffordable rents for employment space. Providing 41% of the space, rather than just 10%, at a 20% discount to market rent in this location, will support a wider range of occupiers who may be unable to afford rents elsewhere in RBKC or LBHF. The Affordable Commercial Space has been designed to be flexible and adaptable, including being capable of subdivision into small units, to respond to market signals demonstrating demand for small units and managed space.

**06.3.58** The Affordable Commercial Space will be secured through a planning condition requiring detailed management plans. These will include information on delivery timelines, floor areas, rents, and fit-out standards, along with targeted sectors or organisations. RBKC will manage the workspace, selecting tenants that align with borough economic goals, support placemaking, and benefit the local community, as detailed in the accompanying LR15 Commercial Report. The plans will also address marketing, management, usage expectations, and monitoring. RBKC will manage the space directly, with a flexible and evolving approach refined through collaboration with the boroughs and formalised in the Section 106 agreement, ensuring long-term social, cultural, or economic benefit.

#### Overall Justification

**06.3.59** The existing employment provision at Lots Road South is of variable quality and arranged in a fragmented way on site. Temporary structures dominate significant portions of the Site, and the permanent uses offer limited employment.

**06.3.60** Market analysis shows demand in the local area for small, high-quality, flexible units. The immediate submarket is characterised by successful developments like Worlds End Studios and Chelsea Wharf, which provide adaptable space to creative industries, independent businesses, and design-led SMEs. There is also an undersupply of modern space suitable for 'maker' activities and studio-based creative uses. Demand is strongest for spaces that are energy efficient, ready-to-occupy, and designed to support collaborative or hybrid working models.

**06.3.61** The proposed development responds to this demand with 2,038.2 sqm of high-quality, flexible non-residential floorspace. This includes affordable workspace, a ceramics studio and art gallery linked to Heatherley School of Fine Art, community space, and open-market flexible commercial units. The configuration allows adaptability between retail, office, and light commercial uses, enabling occupation by a broad range of businesses. The affordable and community-linked elements will anchor creative and social functions on site, while the open-market space supports diverse commercial activity.

**06.3.62** Although the quantum of commercial space is reduced compared to the existing, the proposed floorspace offers a substantial upgrade in functional quality, spatial efficiency, and employment potential. A mix of temporary and permanent, restrictively configured, low-grade structures are being replaced with fit-for-purpose accommodation that meets real, evidenced demand that are far more likely to be occupied. This shift from quantity to quality ensures that the Site continues to function as an employment location, in line with its allocation under Site Policy SA6, while significantly improving its economic productivity and long-term viability.

#### **06.3.63** Supporting Information

**06.3.64** Please see the following documents submitted in support of this planning application for further details:

- / LR15 Commercial Report (Chillmark)
- / LR39 Financial Viability Assessment. (DS2)

## 06.4 CHELSEA CREEK AND PROPOSED CREEK WALL

### Planning Policy

- 06.4.1** London Plan Policy SI14 (Waterways – strategic role) emphasises the strategic importance of London's waterways for transport, leisure, biodiversity, drainage, and regeneration. It supports their multifunctional role and seeks to protect, enhance, and restore these assets. Development proposals must respect the distinct character of waterways, improve public access and contribute to waterway-related economic and ecological functions.
- 06.4.2** London Plan Policy SI16 (Waterways – use and enjoyment) promotes the multifunctional use and enjoyment of London's waterways by protecting and enhancing public access, supporting water-based recreation, and integrating waterways into development schemes. It encourages walking and cycling along waterside paths, the provision of moorings, and supports cultural, community and leisure uses, while requiring development proposals to respect the character, ecological value, and operational functions of the waterways.
- 06.4.3** London Plan Policy SI17 (Protecting and enhancing London's waterways) seeks to protect and enhance London's network of waterways, including rivers, canals, docks, and reservoirs, recognizing their value for biodiversity, recreation, transport, and climate resilience. The policy supports multifunctional use and requires development proposals to improve water quality, ensure flood resilience, preserve waterway heritage and character, and enhance access and ecological value.
- 06.4.4** RBKC Policy GB11 (Flood Risk) states that new development adjacent to the River Thames and Chelsea Creek must be set back by 16m from the Thames flood defence, including tie rods and support structures, to enable the sustainable and cost-effective upgrade of flood defences in line with the requirements of the Thames Estuary 2100 Plan.
- 06.4.5** RBKC Local Plan Policy SA6 (Lots Road South) states that the development should make a feature of the creek within the landscape strategy. The supporting text for the policy also states that '*The submitted Flood Risk Assessment will also need to demonstrate that any tidal flood defences along the Chelsea Creek can be raised in line with the TE2100 plan as required by Policy GB11 of this Local Plan and Policy SI 12 of the London Plan, and that the design life of the flood defence is commensurate to the lifetime of the development. A 16-metre buffer should be provided from the outer edge of these flood defences (including any buried elements such as any tie rods or anchor blocks)*'.
- 06.4.6** LBHF Policy RTC1 (River Thames) seeks to protect and enhance the River Thames and its foreshore, promoting it as a key asset for recreation, ecology, transport, and heritage. The policy supports development that improves public access to the river, safeguards and improves the Thames Path, and enhances biodiversity and water quality.
- 06.4.7** LBHF Policy RTC2 (Access to the Thames Riverside and Foreshore) promotes improved public access to the Thames Riverside and foreshore. It supports development that enhances permeability, maximizes opportunities for inclusive riverside access, and links to the Thames Path.

**06.4.8** LBHF Policy RTC4 (Water-based Activity on the Thames) encourages the retention and improvement of existing river infrastructure such as piers and slipways, and the inclusion of such facilities in new riverside developments where appropriate.

#### Chelsea Creek History

**06.4.9** Chelsea Creek is a former tidal stream that sits on the southern boarder of the Lots Road South site. The stream formerly rose in Kensal Green and flowed south through what is now Little Wormwood Scrubs and into the Thames near Chelsea.

**06.4.10** By the early 19th century, the creek was increasingly canalised to support industry and transport. In 1828, it was developed into the Kensington Canal to link the Thames with Paddington Basin. However, the canal was commercially unsuccessful due to competition from railways and limited navigability. By the 1850s, much of it was sold to railway companies and infilled, with the West London Line built along its former route.

**06.4.11** The southernmost section near the Thames remained in use as an industrial dock and wharf area into the 20th century, supporting power generation (notably Lots Road Power Station) and other riverside industry. The western facades of the warehouses on the Lots Road South site reflect the previous alignment of the wharf prior to infilling, which is also current local authority boundary between RBKC and LBHF.

**06.4.12** At present Chelsea Creek is mostly bounded by a retaining wall over almost all of its length, comprising for the most part a combination of concrete, steel sheet piling and brickwork and which provides a safe and stable edge to the Creek and the River Thames into which the Creek is connected by an open channel. One short section on the northern side of the Chelsea Creek comprises an unconsolidated bank of made ground, rubble and alluvium which was constructed in the mid 20th Century, when the former northern alignment of the creek was roughly back-filled into made ground. This unconsolidated bank forms approximately half of the southern interface between the Lots Road South site and Chelsea Creek.



*Current condition of the creek wall, with back-filled section between the walled sections clearly visible.*

### 2022 Creek Wall Permission

**06.4.13** Planning permissions (RBKC ref. PP/22/03939) and LBHF ref. PP 2022/01832/FUL) for the construction of a new section of Creek wall were granted by Royal Borough of Kensington and Chelsea in October 2022, and LBHF in December 2022. The works straddle the boundary of the two boroughs. The approved works did not cover the full scope of work required. The current planning application includes revised proposals for a new creek wall fully incorporated into the new proposals.

### Proposed Works to the Creek Wall

**06.4.14** The works to improve the flood defences through the Site has now been incorporated into the wider scheme for the application site.

**06.4.15** The creek wall proposals are comprised of three components:

- / Central Embankment: The central earth embankment is to be replaced with a new piled flood defence wall, on the same alignment as the approved RBKC proposal, as agreed with the Environment Agency, RBKC and LBHF.
- / Eastern Wall: The eastern section of wall between the central area of creek earth embankment and the approach walls and abutment to Chelsea Creek bridge crossing on Chelsea Harbour Drive will be replaced as this existing wall is showing signs of deterioration and deformation. The new wall will follow the same approximate alignment as existing, but the straightened alignment will pull back from the Creek slightly compared to existing. The existing eastern bridge abutments and brick approach walls will be cleaned, repointed and repaired where necessary.
- / Western Section: The continued new defence will be formed by the raised ground sloping up through a landscaped area to meet the defence level requirements.

**06.4.16** The proposed works will provide a continuous new defence level at 6.40m AOD. This is consistent with the approved RBKC proposals, and comparison with the TE2100 requirements. This exceeds the full requirement for flood defence raising to the furthest year 2100 epoch and the proposed level is above the projected 2100 flood level by 570mm.

**06.4.17** The new river wall shall be formed as a cantilever piled wall, either sheet piled or contiguous flight auger bored secant piled wall, without any tie-rods into the Site. It shall be topped with a reinforced concrete capping beam to tie all pile heads together and allow solid founding for any railings / balustrading.

**06.4.18** The wall shall be designed by the river wall specialist to support the load of the ground material behind the wall, alongside a surcharge of 20kPa (minimum). It is noted that the proposed buildings within the Site are on piled foundations, such that they will not surcharge the river wall.

**06.4.19** The wall shall be designed and installed in accordance with BS EN 1990 – Basis of Structural Design, with materials specified to demonstrate a design life of at least 100 years. A structural performance specification for these design works shall be developed at tender stage for the river wall specialist to design in line with.

### Development Setback and Access

**06.4.20** In response to the Thames Estuary 2100 Plan and RBKC Policy GB11 (Flood Risk) requirements for a 16m setback for new development from Thames flood defences, the Applicant has consulted with the Environment Agency and drainage officers from both RBKC and LBHF. The Environment Agencies 21st May 2025 written feedback confirmed that it is possible that a setback of less than 16m could be accepted at the Site:

*'If the full 16m cannot be delivered, we would expect to see further justification as to why this is the case, and expect provision of as much set back as possible. For any set back less than 16m we would expect to see evidence that it would not harm the flood defences, that access can still be provided for maintenance and repair and that flood risk will not be increased elsewhere'.*

**06.4.21** The proposals incorporate a 6.3m-wide zone from Blocks A and E to the creek boundary. This includes a flexible zone adjacent to Block A, a shared pedestrian path and a creek-edge zone with seating and planting. Comprehensive details of all landscaping elements, including tree planting, street furniture, and any other fixed objects, have been provided to demonstrate that these features will not impede access. Please see the landscape section of the planning statement and LR12 Landscape Statement for full details of the landscaping strategy and how this relates to Chelsea Creek.

**06.4.22** The LR26 Transport Assessment submitted in support of this application includes vehicle tracking details, demonstrating that the offset provides usable space that can be readily accessed by personnel, plant, and machinery. Tracking diagrams are included to illustrate clear plant and vehicular access to the flood defence infrastructure, including the section adjacent to the railway. Example vehicle specifications have been provided in support.

### Creek Wall Details and Technical Matters

**06.4.23** At present the technical specification of the creek wall has not been developed, although the planning application does confirm the creek wall location and interaction with the proposed flooding, drainage, landscape, planting and ecology strategies. We propose to include a pre-commencement planning condition to secure the technical details of the creek wall construction and confirm loading calculations for the bank, to be delivered prior to the commencement of Blocks A and E.

**06.4.24** We are aware that the policies listed above include requirements relating to biodiversity, flooding and drainage. These technical matters have been considered holistically as part of the wider scheme and are addressed in full in the following sections of this planning statement and supporting documents:

- / Access and Servicing
- / Flooding
- / Drainage
- / Ground Conditions

- / Landscape and public realm
- / Ecology

#### Supporting Information

**06.4.25** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement
- / LR12 Landscape Statement
- / LR26 Transport Assessment
- / LR28 Draft Delivery and Servicing Strategy
- / LR30 Demolition and Construction Management and Logistics Plan
- / LR31 Flood Risk Assessment
- / LR32 Sustainable Urban Drainage Strategy
- / LR33 Baseline River Condition Assessment
- / LR43 Tree Survey and Arboricultural Impact Assessment
- / LR45 Biodiversity Survey and Report
- / LR46 Biodiversity Net Gain Assessment

## 06.5 PROVISION OF NEW HOMES

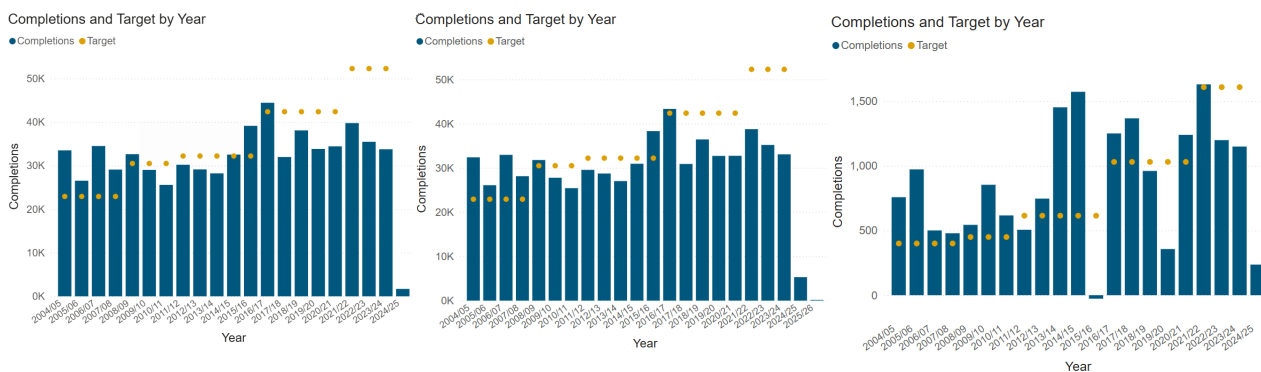
### Planning Policy

- 06.5.1** Paragraph 60 of the NPPF supports the Government's continued objective to significantly boost the delivery of homes. The NPPF makes it clear that in order to achieve this objective it is important to ensure that a sufficient amount and variety of land can come forward.
- 06.5.2** The London Plan evidences (through the GLA's new Strategic Housing Market Assessment) that London has a need for approximately 66,000 additional homes a year. The Plan's ten-year housing target is 520,870 homes and is based on the findings of the new Strategic Housing Land Availability Assessment (London Plan (2021) Paragraph 2.3.3). This London wide target indicates a significant requirement for Boroughs to deliver much needed housing as part of their Local Plans.
- 06.5.3** Planning law states that applications should be determined in accordance with the policies in an area's Local Plan, unless material considerations indicate otherwise. In the planning profession, this is often referred to as the flat balance. The Government has been clear in its objective to deliver 1.5 million new homes over the next 5 years as part of its Plan for Change. National, strategic and local levels of planning policy are all clear in their support for the redevelopment of brownfield sites such as Lots Road South. This was echoed by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government in her first Ministerial Statement on 30th July 2024 which stated:
- “The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes...”*
- 06.5.4** London Plan Policy H1 (Increasing housing supply) emphasises the urgent need to increase the supply of housing in London. Table 4.1 sets a 10-year target for housing delivery at 4,480 homes in RBKC 16,090 homes in LBHF.
- 06.5.5** The Mayor of London confirmed in a speech in January 2024 that house building is slowing in London as the cost of construction rises. The supporting report shows that the cost of construction materials, such as steel, timber and concrete for all types of work rose by 21% in 2023. This increase is roughly equal to the rise that was seen across the previous 12 years in total.
- 06.5.6** This slowdown in housing delivery is further evident on a national scale, with recent data published by the then Department for Levelling Up, Housing and Communities (DLUHC – March 2024) (now the Ministry of Housing, Communities and Local Government) (SOC51) stating that, between 1 October and 31 December 2023 (Q4), the number of dwellings in England where building work has started on site was 19,080 which equates to a 51% decrease when compared to the same quarter of the previous year (2022). In this period, the number of dwellings completed was 39,650 which is a decrease of 15% when compared with the same quarter of the previous year (2022).

**06.5.7** The DLUHC report data shows that housing starts and completions both reached their lowest level in the first quarter of 2020 reflecting the restrictions introduced during the COVID-19 pandemic. Following a sharp uptick in the September Quarter 2020, starts have been more unstable, peaking in the June Quarter 2023 and then falling sharply again in the second half of 2023. Completions decreased in the March Quarter of 2023 and have been stable since. On a regional scale, the data demonstrates that housing completions decreased in all regions from the previous year, however the largest percentage decrease was in London, where completions decreased by 22% from the previous year.

**06.5.8** The recent decrease in housing delivery can be explained by the catalogue of unprecedented global events and market factors occurring during this period. A combination of interest rate rises, significant cost inflation, changing building regulations and recent difficulties in securing a Registered Provider for the affordable housing component of developments have all had a stagnating effect on housing delivery.

**06.5.9** As outlined within paragraph 4.1.2 of the London Plan it should be recognised that London is a single housing market area, with a series of complex and interlinked sub-markets. As such it is not appropriate to focus on housing delivery within RBKC or LBHF in isolation but rather London as a whole. The Planning London Datahub demonstrates that while the London Plan 2021 sets an annual target of 52,287 residential completions across London, this figure has not been achieved at any point since the target was introduced in 2021. It is not since 2016/17 that the annual housing target was met with 43,313 new homes delivered of the then lower 42,388 annual target (equivalent of 102% of the target). The new standard method as outlined in the revised NPPF will result in an increase in RBKC’s housing targets to 5,107 new homes per annum from 1,381 in the previous standard model. LBHF’s housing target increases to 2,783 new homes against the previous standard models of 1,580. This reflects the substantial need for housing in the boroughs.



*Completions vs target in London (left), RBKC (centre) and LBHF (right)*

**06.5.10** In response to this the GLA published its Accelerating Housing Delivery Practice Note in December 2024 which outlines strategies to expedite housing development in London, with a focus on increasing affordable housing. It emphasizes the importance of the Fast Track Route, encouraging developers to meet specific affordable housing thresholds to streamline the planning process. The note advocates for enhanced delivery of social rented homes to address significant housing needs.

- 06.5.11** RBKC Policy HO1 (Delivery and Protection of Homes) acknowledges the London Plan Policy H1 delivery target of 4,480 new homes over 10 years and aims to exceed this target. Part of delivering against this target is acknowledged as supporting the delivery of homes on site allocations. The housing target aims to deliver 1,250 homes in the first five years of the Local Plan (2024/25 to 2028/29) with an annual target of 250 homes.
- 06.5.12** RBKC Policy SA6 (Lots Road South) allocates the Site to deliver 165 homes in the next 1-5 years, comprising around 100 new gross residential (C3) units and around 65 gross affordable extra care units. This means that the allocation represents 66% of the annual housing delivery target for the 2024/25 to 2028/29 period set out by Policy HO1 of the RBKC Local Plan.
- 06.5.13** RBKC's most recent Planning and Place Monitoring Report (December 2024) demonstrates that in 2022/23 there were 275 net completions and in 2023/24 there were 239 net completions, a significant shortfall against the target of 448 homes per annum and only 4.7% of the 5,107 new homes per annum set out in the new standard model.
- 06.5.14** LBHF Policy HO1 (Housing Supply) sets out a minimum target of 1,031 additional dwellings a year up to 2035, however this is based on the 2016 London Plan, which has been superseded, along with the housing targets for the Borough. The most recent LBHF Annual Monitoring Report available (April 2021 to March 2022) demonstrated that 1,700 net additional dwellings were completed in the period. London Data store suggests a slightly lower number of completions at 1,630 for 2021/22. This has then dropped to 1,199 in 2022/23 and 1,150 in 2023/24. These recent figures all fall below the 1,609 required by the London Plan and significantly below the 2,783 homes required by the new standard model.
- 06.5.15** In addition to the above policies, the NPPF sets out (within the presumption in favour of sustainable development policy in Paragraph 11) that local policies should be considered out of date when the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Whilst the tilted balance is a policy approach in footnote 8 of the NPPF, there is no specific reference to the term within it. Rather, it is shorthand for the presumption in favour of sustainable development contained within Paragraph 11(d) of the NPPF, which states that this means planning permission should be granted unless:
- / the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - / any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 06.5.16** Whilst the tilted balance is a policy approach in the National Planning Policy Framework (NPPF), there is no specific reference to the term within it. Rather, it is shorthand for the presumption in favour of sustainable development contained within Paragraph 11(d) of the NPPF.
- 06.5.17** This states that where there are no relevant policies, or if the most relevant Local Plan policies for determining a planning application are 'out of date' planning permission should be approved. The exceptions are where a

proposal is in a protected area (as defined by the NPPF) or where the harms caused by the proposed development significantly outweigh its benefits.

- 06.5.18** The term 'tilted balance' is used in reference to NPPF Paragraph 11(d) because, when engaged, the tilted balance should change the 'balancing exercise' which the decision-maker uses when deciding whether or not to grant planning permission. The balance is whether the harms 'significantly and demonstrably' outweigh the benefits of granting permission. The tilted balance 'tilts' the balance in favour of approving an application.
- 06.5.19** When the tilted balance is engaged, it is necessary to conduct a planning balance in determining applications and appeals. This is where the decision-making will afford varying degrees of weight to the harms and benefits associated with a proposed development. It is a nuanced and subjective process, and not as clear-cut as one benefit outweighs one harm.
- 06.5.20** The Government's Housing Delivery Test measurement is an annual, standardised measurement of housing delivery across England, the most recent Housing Delivery Test 2021 (published 14 January 2022) covers the years 2018/19, 2019/20 and 2020/21. Due to the unprecedented events as a result of the COVID-19 pandemic, including the first national lockdown being announced on 23 March 2020, there was temporary disruption to local authority planning services and the construction sector. This has therefore been reflected in the 2020 results and reduced the 'homes required' within the 2019 to 2020 year in the Housing Delivery Test by one month and within the 2020 to 2021 year by four months.
- 06.5.21** Despite this reduction, during the relevant three-year period (2018-2021), the Royal Borough of Kensington and Chelsea delivered only 809 homes, in comparison to their target of 1,892 new homes. The Borough therefore only managed to achieve 43% housing delivery and is therefore subject to a presumption in favour of sustainable development as set out in Paragraph 11 of the NPPF.
- 06.5.22** While this means current local policies relating to housing should be considered out of date and forthcoming developments within the Borough should be assessed against their compliance with the NPPF only, it will be confirmed below that the scheme complies both with the NPPF and also with current and draft Local Plan housing policies.
- 06.5.23** The Council has subsequently produced a Housing Delivery Test Action Plan (dated August 2022) which sets out the actions it will take to increase housing supply. This was required to be produced given the Council's significant failure to meet its housing targets. One of the key actions identified by the Housing Action Plan to boost housing delivery within the borough is to 'prioritise the delivery of key sites', including site allocations. To achieve this, the Council set up the Growth and Delivery Team to promote good growth through proactive planning and focus on site delivery and good community engagement, recognising that speeding up the delivery of Kensal Canalside can go a long way in closing the gap between the number of houses built and the housing target for the Borough.
- 06.5.24** The importance of housing delivery on this site is therefore recognised within documents produced by the Council and represents the Borough's last opportunity to secure a significant number of homes on an underutilised brownfield site. The significance in securing the successful redevelopment of this site is therefore great.

**06.5.25** It is also relevant to note more recent housing starts. In the most recent 12 months where data is available (between Q2 2024 and Q1 2025) RBKC have made 0 Private Enterprise Starts, Housing Association Starts or Local Authority Starts. In the same period LBHF have made only 110 starts across all housing types. This suggests a significant slowdown in housing delivery in recent months when compared to the same dataset from between Q2 2023 and Q1 2024 where RBKC completed 10 homes and LBHF completed 120 homes.

#### Application Scheme

**06.5.26** The principle of delivering homes on the Lots Road South site is recognised in policy by the (SA6 Lots Road South) site allocation. The Site is also brownfield and should therefore be prioritised for delivery of new homes.

**06.5.27** The Application Scheme is proposing to deliver a total of 274 new homes, including 65 affordable extra care homes, 53 affordable general needs homes and 156 market homes.

**06.5.28** 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. 69% of the Site is in RBKC (eastern part); 31% of site in LBHF (western part). The Site is owned by RBKC, and their land ownership extends across both boroughs.

**06.5.29** The proposed delivery of 274 new homes on the allocated brownfield site at Lots Road South provides a policy-compliant and necessary response to the acute and persistent housing shortfall in both RBKC and LBHF. The scheme aligns with national, regional, and local policy objectives, including the Government’s Plan for Change, the London Plan’s strategic housing targets, and the significantly increased housing requirements set out under the new standard method. It delivers a balanced mix of market, affordable, and specialist housing. In doing so, it addresses identified local needs while directly supporting the policy imperative to prioritise brownfield land. The principle of residential-led development on this site is therefore fully justified and its delivery would play a vital role in accelerating housing provision within one of London’s most constrained and pressurised housing markets.

#### Supporting Information

**06.5.30** Please see the following documents submitted in support of this planning application for further details:

/ LR11 Design and Access Statement (PRP)

## 06.6 AFFORDABLE HOUSING AND COMMUNITY HOUSING

### Planning Policy

- 06.6.1** London Plan Policy GG4 (Delivering the homes Londoners need) aims to ensure the delivery of more homes, supporting a strategic target where 50% of all new homes are genuinely affordable, and fostering mixed and inclusive communities with high-quality, well-designed homes that meet identified needs, including specialist housing.
- 06.6.2** London Plan Policy H4 (Delivering affordable homes) sets a strategic target of 50% of all new homes across London to be genuinely affordable. Major developments must adhere to the threshold approach for affordable housing provision, using grants to exceed the baseline affordable housing delivery. Affordable housing should be provided on-site, with off-site or cash contributions allowed only in exceptional circumstances
- 06.6.3** London Plan Policy H5 (Threshold approach to applications) outlines the requirements for proposals that trigger affordable housing obligations. It sets a minimum threshold level for affordable housing at 50 per cent for public sector land where there is no portfolio agreement with the Mayor and 50 per cent for Locally Significant Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity. Proposals meeting these thresholds without public subsidy can follow the Fast Track Route, exempting them from submitting detailed viability assessments. They must also align with tenure split requirements, meet other relevant policies, and demonstrate efforts to secure grant funding to increase affordable housing. If these criteria are not met, the proposal must follow the Viability Tested Route, requiring detailed viability evidence.
- 06.6.4** London Plan Policy H6 (Affordable housing tenure) requires proposals for affordable housing to provide at least 30% of the housing as low-cost rented homes (such as London Affordable Rent or Social Rent) for Londoners on low incomes, another 30% must be intermediate products (like London Living Rent and London Shared Ownership), and the remaining 40% is to be determined by the borough based on local needs. To qualify for the Fast Track Route, at least 35% of the homes must adhere to these tenure splits. Proposals providing more than 35% affordable housing can have a flexible tenure mix as long as the homes are genuinely affordable and the overall provision of affordable housing is maximized. RBKC Policy HO3 (Community Housing) requires community housing (defined as genuinely affordable housing in the borough) to be delivered through the threshold approach as set out in the London Plan. Developments should provide at least 35 per cent community housing by habitable rooms or habitable floorspace on-site on private land and at least 50 per cent by habitable rooms or habitable floorspace, on-site on public land where there is no portfolio agreement with the Mayor. The application of the habitable rooms or habitable floorspace metric will be based on whichever is the most appropriate for the housing needs of the area. To benefit from the Fast Track Route of the London Plan threshold approach, all other policy requirements for community housing must also be met.
- 06.6.5** LBHF Policy HO3 (Affordable Housing) states that borough wide target that at least 50% of all dwellings built should be affordable. Affordable dwellings should be located throughout a new development and not concentrated on one part of the Site.

### Application Scheme

**06.6.6** The Lots Road South site is publicly owned by RBKC and is also designated as a Locally Significant Industrial Site. This means that the 50% threshold for affordable housing applies in accordance with London Plan Policy H5 and RBKC Policy HO3.

**06.6.7** The Application Scheme includes a total of 274 new homes, including 65 affordable extra care homes, 53 affordable general needs homes and 156 market homes. This breaks down as follows:

By Unit	By Habitable Room
Open Market: 156 (56.9%)	Open Market: 400 (55.5%)
Social Rent Extra Care: 65 (23.7%)	Social Rent Extra Care: 139 (19.3%)
Social Rent Affordable: 53 (19.3%)	Social Rent Affordable: 182 (25.2%)
<b>Total Affordable: 118 (43.0%) of 274</b>	<b>Total Affordable: 321 (44.5%) of 721</b>

**06.6.8** The Application Scheme delivers 44.5% affordable housing by habitable room, provided entirely (100%) as social rent, which is the most affordable type of affordable housing.

**06.6.9** This level of provision represents the maximum reasonable amount that can be delivered, as evidenced by the accompanying Financial Viability Assessment (LR39).

**06.6.10** The provision of 44.5% affordable housing (delivered as 100% social rent) compares favourably with the provision of a 50% affordable housing scheme (delivered with a policy compliant tenure mix including intermediate housing), as evidenced by the accompanying Financial Viability Assessment.

**06.6.11** Since the Application Scheme does not meet the 50% threshold, without public subsidy, it therefore follows the Viability Tested Route. As a viability tested scheme it will be subject to both early and late-stage reviews.

**06.6.12** The scheme complies with all other policy requirements for affordable housing, including on-site provision, appropriate tenure mix, and distribution throughout the development. It also contributes a significant proportion of affordable extra care housing, directly addressing identified specialist housing needs in line with Policy GG4 and Site Allocation SA6.

**06.6.13** In conclusion, the application proposals deliver a substantial and policy-compliant affordable housing offer, comprising 118 homes (65 extra care and 53 general needs units) all at social rent levels. This exceeds the expectations of Policy SA6 and contributes meaningfully to addressing acute housing need in both RBKC and LBHF. The scheme's fully integrated, tenure-blind design ensures high-quality affordable housing is indistinguishable from market units, supporting inclusive community development. The extra care provision responds directly to the borough's identified shortfall in specialist accommodation, while the general needs

homes provide a diverse mix of unit sizes to support long-term community sustainability. Together, these elements represent a significant planning benefit.

#### Financial Viability

- 06.6.14** The FVA illustrates a deficit when the RLV of the Proposed Development is assessed against the BLV. Therefore, the Proposed Development is providing in excess of the maximum amount of affordable housing and other planning obligations.
- 06.6.15** Mandatory sensitivity testing has been carried out to further verify the robustness of the conclusions. This includes sensitivity in relation future sales growth and cost inflation. In all cases, the conclusions are consistent with the results of the FVA, in that the proposed affordable housing offer is in excess of the maximum viable amount.
- 06.6.16** A commercial decision has been made by the Applicant to provide 44.5% affordable housing by habitable room, alongside the range of other public benefits including Community Infrastructure Levy ('CIL') funding for local infrastructure.
- 06.6.17** The 44.5% affordable housing is provided as entirely social rent. This report demonstrates that the Proposed Development compares favourably to a 50% affordable housing scenario which delivered a policy compliant tenure mix, including intermediate. The Proposed Development includes 44.5% social rent in comparison to c.32% social rent which would be included as part of a policy compliant tenure mix.

#### Supporting Information

- 06.6.18** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement (PRP)
- / LR14 Affordable Housing Statement (DS2)
- / LR39 Financial Viability Assessment (DS2)

## 06.7 HOUSING TENURE AND MIX

### Planning Policy

- 06.7.1** London Plan Policy H10 (Housing size mix) requires schemes to deliver a range of unit sizes, taking into account local evidence set out in the 2017 London Strategic Housing Market Assessment. Proposals should aim to create mixed and inclusive neighbourhoods, deliver a variety of unit types at different price points and provide a mix of tenures within the development. The policy emphasizes the need to optimize housing potential, reduce pressure on existing stock, and provide additional family housing.
- 06.7.2** RBKC Policy HO3 (Community Housing) requires that Community housing must be provided as 70 per cent social rent. The remaining 30 per cent community housing must be provided as intermediate with the preferred product being London Living Rent at the lowest ward level in the borough.
- 06.7.3** RBKC Policy HO4 (Housing Size and Standards) requires that new residential developments must include a mix of types and sizes of homes to reflect the varying local needs of the borough, taking into account the characteristics of the Site, and current evidence in relation to housing need.
- 06.7.4** The September 2022 Local Housing Needs Assessment ('LHNA') for the Royal Borough of Kensington and Chelsea sets identifies a different bedroom size mix for market and community housing. The report concludes that the borough is likely to see a 7 per cent decrease in households with children. By 2040 the borough will have lost 13 per cent of its younger households. At the same time, it finds that there is a high level of under occupancy around 44 per cent particularly (though not exclusively) in the owner-occupied sector. Therefore, to address this high level of under occupancy in the market sector the LHNA identifies a much higher need for smaller homes. Where two-bedroom homes are provided these should be for four persons which allows the flexibility to accommodate young families. This would be help in providing homes suitable for families as a proactive step to encourage more families and stem the loss of this cohort from the borough. The bedroom size requirements are specified as:

Dwelling Size	Percentage
1 Bedroom	35%
2 Bedroom	40%
3 Bedroom	20%
4+ Bedroom	4%

- 06.7.5** For Community Housing the LHNA has found that the greatest need is for two-bedroom homes followed by three-bedroom homes. It should be noted that the need based on the Council's housing register and waiting list is for the two-bedroom homes to be for four persons so they can also cater for families. It should also be noted that although small, there is a demand for three-bedroom homes from families with a child on the autism spectrum disorder (ASD), where it may be inappropriate for the child to share a bedroom with a sibling.

**06.7.6** LBHF Policy HO3 (Affordable Housing) states that 60% of additional affordable housing should be for social or affordable rented housing, especially for families and 40% should be a range of intermediate housing. The bedroom size requirements for community housing are specified as:

Dwelling Size	Percentage
1 Bedroom	16%
2 Bedroom	44%
3 Bedroom	28%
4+ Bedroom	12%

**06.7.7** LBHF Policy HO5 (Housing Mix) states that developments should aim to meet the following mix subject to viability, locational characteristics and site constraints being considered on a site by site basis:

Dwelling Size	Social and Affordable Rent	Intermediate
1 Bedroom	10%	50%
2 Bedroom	40%	35%
3 Bedroom	35%	15% (3 bed +)
4+ Bedroom	15%	15% (3 bed +)

**06.7.8** For market housing, a mix of unit sizes including larger family accommodation.

#### Application Scheme

**06.7.9** The proposed mix of residential units has been carefully designed to respond to strategic and local policy requirements while accounting for site-specific factors. The proposed tenure and mix is:

Dwelling Size	Open Market	Extra Care Social	General Needs Social	Scheme Total
1 Bedroom	64 (41%)	65 (100%)	9 (17%)	138 (50%)
2 Bedroom	80 (51%)	0 (0%)	28 (53%)	108 (39%)
3 Bedroom	12 (8%)	0 (0%)	16 (30%)	28 (10%)
4+ Bedroom	0 (0%)	0 (0%)	0 (0%)	0 (0%)

#### Market Housing Mix

**06.7.10** The open market dwellings deliver a high proportion of 1-bed (41%) and 2-bed (51%) homes, aligning with the 2022 Local Housing Needs Assessment (LHNA) which identifies a growing need for smaller homes in response to high under-occupancy in the borough. The inclusion of 12 three-bedroom homes (8%) supports a mixed and inclusive community, though falls below LHNA's 20% target for three-beds in the market sector, this is balanced by the Site's viability constraints.

**06.7.11** LBHF Policy HO5 (Housing Mix) states that for market housing, a mix of unit sizes including larger family accommodation. The Application Scheme proposes a range of house sizes in the market tenure, including 12 (8%) 3 bed homes. We therefore consider the proposals to accord with policy.

### Community Housing – General Needs Social Rent Mix

- 06.7.12** The General Needs Social Rent units demonstrate an emphasis on family housing with 16 three-bedroom units (30%) and a combined 28 two-bedroom units (53%) including 2B4P, 2B3P and 2B3P W types. This reflects the LHNA and Local Plan Policy HO4 which prioritise family housing within the social rent sector, especially 2B4P units capable of meeting broader household needs, including families with specific needs (e.g., ASD).
- 06.7.13** This proposed mix only represents a small deviation from LBHF Policy HO3. The main deviation is the lack of 4 bed home, however the inclusion of 4 bed affordable homes would reduce the viability of the proposals.

### Community Housing – Extra Care Social Rent Mix

- 06.7.14** The 65 Extra Care Social Rent units respond to an identified need for specialist housing. All of the homes will be 1 bed units, in line with expectations for this type of provision. The inclusion of 46 standard EC1B, 10 EC1B W, and 9 EC1B+ units provides a diverse offer suitable for elderly and disabled residents requiring care support, aligning with Policy H10's emphasis on meeting specialist housing need.
- 06.7.15** Although this 100% 1 bed mix does not accord with RBKC and LBHF policy for affordable tenures, the 65 extra care homes provide much-needed specialist accommodation for older residents requiring support while maintaining independence, directly addressing a strategic shortfall identified by RBKC. The 100% one-bedroom tenure mix is acceptable in policy terms as it reflects the specific needs of the intended residents, and is consistent with RBKC's Elderly Persons' Accommodation SPG, which recognises that smaller units are appropriate for this form of housing.

### Tenure

- 06.7.16** The Extra Care Social Rent and General Needs Social Rent comprise the affordable housing offer, which represents 100% social rent with no intermediate.
- 06.7.17** The community housing element of the Proposed Development consists entirely of social rent tenure. RBKC Policy HO3, requires 70% of affordable housing to be social rent. LBHF Policy requires 60% of affordable housing to be social rent. The proposed scheme exceeds this by delivering 100% of the affordable housing as social rent. Although the policies seeks 30%-40% to be intermediate, the 100% social rent approach is justified in the context of acute local need for genuinely affordable homes, as demonstrated by the provision of 28 two-bedroom (53%) and 16 three-bedroom (30%) general needs social rent units. These sizes are in high demand and directly respond to identified local housing need, particularly for families.
- 06.7.18** The Extra Care component includes 65 one-bedroom units, also all within the social rent tenure. This provision directly supports the borough's specialist housing objectives and contributes to the delivery of inclusive neighbourhoods by ensuring older or more vulnerable residents can be accommodated within the same development.

## Supporting Information

**06.7.19** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement (PRP)
- / LR14 Affordable Housing Statement (DS2)
- / LR39 Financial Viability Appraisal (DS2)

## 06.8 EXTRA CARE HOMES

### Planning Policy

- 06.8.1** London Plan Policy H13 (Specialist older persons housing) requires Boroughs to plan for specialist older persons housing in response to identified local needs and in line with an identified benchmark of 4,000 units per year across London. Both Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, including those looking to downsize but not wanting to move into specialist older persons housing. Specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy.
- 06.8.2** Specialist older persons housing provision must comply with Policy H4 and H5 by delivering affordable units through the threshold approach, incorporate accessible dwellings per Policy D7, and achieve the highest standards of inclusive design as set out in Policy D5. Schemes must also provide safe, adequate storage and charging for mobility scooters, and ensure convenient pick-up and drop-off points near the main entrance for taxis, minibuses, and ambulances with appropriate kerb design.
- 06.8.3** RBKC Policy HO5 (Specialist Housing) supports the delivery of older people's housing including new extra care, to meet identified local needs. Extra care must provide on-site community (affordable) housing as per the requirements set out in Policy HO3. It encourages provision in appropriate locations with good access to services and amenities and requires developments to be designed to meet the specific needs of intended residents.
- 06.8.4** RBKC Policy SA6 (Lots Road South) requires the Lots Road South development to provide '*around 65 gross affordable extra care units*'.
- 06.8.5** LBHF Policy HO7 (Meeting Needs of People who Need Care and Support) supports the delivery of new specialist housing including extra care where proposals can demonstrate a clear local need, provide facilities that meet appropriate standards for the intended residents, be well-located with access to public transport and essential services, and avoid harmful impacts on local amenity or existing services. The site allocation SA6 demonstrates this clear local need.

### Application Scheme

- 06.8.6** The extra care homes in the application proposals should be classified as 'extra care' rather than a 'care home', in accordance with London Plan Policy H13, paragraph 4.13.14. The scheme provides self-contained homes, each with its own front door, kitchen, and bathroom, allowing residents to live independently. Unlike care homes, which offer institutional accommodation with full-time care, the Lots Road proposals promote autonomy, with 24-hour staff focused on support rather than nursing or medical care.
- 06.8.7** Residents retain full control over their tenancies and care arrangements, as they would in conventional homes. Some residents may only require a little care, while others may receive regular support from external providers.

This concentration of residents with care needs also allows local healthcare services to operate more efficiently, reducing travel time for at-home visits. The proposals therefore meet the definition of extra care housing and fall within Use Class C3.

- 06.8.8** The inclusion of affordable extra care housing on the Lots Road South site directly addresses an identified need for specialist accommodation for older people within the borough, as recognised in Policy SA6 of the Local Plan.
- 06.8.9** The proposed extra care element is located within Building C and comprises 65 self-contained one- and two-bedroom apartments designed to enable older people to live independently while accessing on-site support services. 100% of the extra care homes will be affordable.
- 06.8.10** The accommodation is provided alongside dedicated shared facilities, including a communal lounge with a kitchen, and an activities room,. These facilities are designed to foster social interaction, reduce isolation, and promote wellbeing among residents.
- 06.8.11** The design has been carefully tailored to meet the needs of older residents through principles of accessibility, flexibility, and high-quality living environments. All homes are fully wheelchair accessible and exceed national minimum space standards, with level access throughout and generous circulation space. Internal layouts have been optimised for ease of movement and daily living, and bathrooms are designed to accommodate future adaptations if needed. The layout of the building ensures natural surveillance and clear wayfinding, supporting residents with cognitive or visual impairments.
- 06.8.12** The quality of design is further demonstrated in the provision of external spaces. Private balconies or terraces are provided for each apartment, and residents have access to shared outdoor areas including a sensory garden and growing beds, specifically intended to support therapeutic activity and connection with nature. These spaces are sheltered, secure, and step-free, offering safe environments that promote independence and social engagement.
- 06.8.13** The proposed development fully complies with the design standards referenced in the London Plan, ensuring high-quality, inclusive and accessible accommodation for older persons. 15% of the 65 homes meet the requirements of M4(3) standards for wheelchair users. Adaptations will be carried out on a case-by-case basis to reflect the needs of each individual residents, either when the move in or as their needs change during their tenancy.

#### Supporting Information

- 06.8.14** Please see the following documents submitted in support of this planning application for further details:
  - / LR11 Design and Access Statement (PRP)
  - / LR14 Affordable Housing Statement (DS2)

## 06.9 QUALITY OF ACCOMMODATION

### Planning Policy

- 06.9.1** London Plan Policy D4 (Delivering good design) requires major development proposals to ensure high-quality design and placemaking. Proposals must include design and access statements demonstrating compliance with the London Plan's design requirements. Scrutiny by borough planning and design officers and a design review process are required for large or tall buildings, with independent experts ensuring transparency and adherence to recommendations.
- 06.9.2** London Plan Policy D5 (Inclusive Design) requires developments to achieve the highest standards of accessible and inclusive design. Proposals should consider London's diverse population, creating high-quality people-focused spaces that promote social interaction and inclusion, ensuring convenience and a welcoming environment without disabling barriers, and providing safe and dignified access for all users. Design and Access Statements must include an inclusive design statement, explaining how these principles have been integrated from the outset and through the development process.
- 06.9.3** London Plan Policy (D6 Housing quality and standards) requires proposals to feature high-quality design with adequately sized, comfortable, and functional layouts. Developments should maximize dual aspect dwellings and minimize single aspect dwellings, ensuring adequate passive ventilation, daylight, and avoidance of overheating. Housing must provide sufficient daylight, minimize overshadowing, and include accessible storage for recyclables and waste. Specific minimum standards are set for internal space, storage, and ceiling heights. Private outdoor space must meet certain size requirements, and housing must integrate different tenures seamlessly without differentiation in quality.
- 06.9.4** London Plan Policy D7 (Accessible housing) requires at least 10% of dwellings must meet Building Regulation M4(3) standards for wheelchair user dwellings, meaning they are either accessible at the point of completion or easily adaptable for future needs. All other dwellings should meet the M4(2) standard, which specifies they are accessible and adaptable for a range of needs. These requirements apply to all new build dwellings and mandate step-free access to ensure inclusivity and choice for diverse populations, including disabled and older individuals, and families with young children.
- 06.9.5** RBKC Policy HO3 (Community Housing) requires a tenure blind approach, with all affordable and market homes integrated in any development and having the same external appearance.
- 06.9.6** RBKC Policy HO4 (Housing Size and Standards) requires that all new homes must be designed to be accessible. To ensure this 90 per cent of new homes within a discrete development must meet Building Regulations requirement to be M4(2) 'accessible and adaptable dwellings'. A minimum of 10 per cent of new homes must meet Building Regulations requirement M4(3) 'wheelchair user dwellings'. All new homes must meet the minimum space standards as set out in the Nationally Described Space Standards.
- 06.9.7** LBHF Policy HO4 (Housing Quality and Density) requires all new housing developments to be of high quality, providing a suitable internal layout, room sizes, and adequate private or communal outdoor amenity space. It

emphasizes compliance with the Mayor of London's minimum space standards and Lifetime Homes criteria to ensure long-term adaptability. The policy seeks to optimize site capacity while respecting the surrounding character and context, avoiding overdevelopment, and ensuring good levels of daylight, sunlight, and privacy. High-density development is acceptable where it delivers exemplary design and residential quality .

**06.9.8** LBHF Policy HO6 (Accessible Housing) requires that all new-build residential development complies with the Building Regulations standards M4(2) for accessible and adaptable dwellings, and that at least 10% of new homes meet the M4(3) standard for wheelchair user dwellings. This ensures housing is inclusive and capable of adapting to residents' changing needs over time. The policy aims to support independent living for older and disabled people, reduce the need for costly adaptations, and promote mixed, balanced communities by integrating accessible housing throughout developments.

**06.9.9** LBHF Policy HO11 (Detailed Residential Standards) sets out the borough's expectations for the design and quality of residential development to ensure high standards of accommodation. It requires all new homes to meet or exceed the minimum space standards in the London Plan, provide adequate private open space, and ensure good daylight, sunlight, privacy, and outlook for future occupants. It emphasizes the importance of accessible and adaptable homes in line with Building Regulations M4(2) and M4(3), and highlights the need for high-quality internal and external environments, including appropriate storage, layout, and noise insulation. The policy seeks to secure inclusive, comfortable, and sustainable living conditions.

#### Design Quality and Placemaking

**06.9.10** The Application Scheme demonstrates a comprehensive commitment to high-quality design and placemaking. The layout, massing, and architectural expression of the scheme have been informed by extensive analysis of the local context, including the varied built form and character along Lots Road and the adjacent Chelsea Creek. The arrangement of buildings allows for permeability across the Site, provides active frontages to surrounding streets and public spaces, and creates a varied and human-scaled environment that responds to surrounding townscape sensitivities. A robust design process has been undertaken, involving pre-application engagement with both boroughs, multiple design review sessions, and continuous refinement of the proposals. Materials and detailing have been carefully selected to ensure longevity, contextual appropriateness, and visual richness.

**06.9.11** The development adopts inclusive design principles from the outset, providing legible, step-free, and safe access throughout the public realm and residential buildings. Entrances are clearly defined, with generous circulation space within buildings and external areas. The layout encourages movement and social interaction, incorporating features such as communal courtyards, active ground floor uses, and seating within landscaped spaces. The public realm strategy prioritises pedestrians and cyclists, enhancing connectivity across the Site and its integration into the wider neighbourhood. Key routes and spaces have been designed to be welcoming to all users, avoiding disabling barriers and supporting social cohesion.

**06.9.12** The proposals provide high residential quality within an efficient and compact urban form, balancing density with amenity and responding positively to the evolving character of the surrounding area.

## Housing Quality and Standards

- 06.9.13** The scheme delivers high quality housing through careful attention to internal layouts, spatial standards, natural light, ventilation, and access to amenity space. All proposed dwellings meet or exceed nationally described space standards, with efficient plans that support modern living, functionality, and adaptability. Each home benefits from clearly defined living, kitchen, and dining spaces, with generous storage provision integrated within the floorplans.
- 06.9.14** 100% of the proposed homes within the Application Scheme meet or exceeds the minimum space standards for new residential developments as set out in the London Plan and the Nationally Described Space Standards. All units are designed to provide adequate internal floorspace relative to their occupancy and bedroom count, ensuring a high standard of living and long-term functionality. The layouts incorporate efficient use of space, with appropriate room dimensions, storage provision, and circulation areas.
- 06.9.15** 57% of the units are dual aspect, enhancing natural daylight and ventilation, and reducing the risk of overheating. Single aspect units have been minimised and are carefully oriented and designed to avoid north-facing exposure and ensure adequate environmental performance. Floor-to-ceiling heights meet minimum standards, contributing to a sense of spaciousness and improved air quality within the dwellings.
- 06.9.16** Private amenity space is provided for all homes in the form of balconies or terraces, meeting minimum size requirements and directly accessible from living areas. In addition, residents benefit from high quality communal amenity areas, including podium gardens and landscaped courtyards. These spaces are designed to foster social interaction, play, and relaxation, and are complemented by access to nearby public open space. The proposed amenity space will be as follows:
- / Private amenity space: dedicated to Extra Care on Podium: 152sqm
  - / Private amenity space: Private Terraces: 115sqm
  - / Private amenity space: Rest of podium: 456sqm
  - / Improved land in Chelsea Creek: 463sqm
  - / Dedicated ecology area: 98sqm
  - / Block A cycle/refuse access: 61sqm
  - / Improved Highway Land: 306sqm
  - / Improved Heatherley Art School open space: 280sqm
  - / All other ground floor open space: 2542sqm
- 06.9.17** The scheme integrates residential uses across the Site without differentiation in quality or character, with all homes designed and finished to a consistent standard regardless of tenure.
- 06.9.18** Attention has also been paid to the quality of the residential environment beyond the home. The development ensures good levels of privacy, outlook, and separation between homes through careful massing, building orientation, and window placement. Acoustic design measures, ventilation strategies, and appropriate servicing and refuse storage have been incorporated to ensure day-to-day comfort and convenience for all residents.

Collectively, these elements contribute to a coherent and high-quality living environment that supports long-term residential wellbeing and adaptability.

#### Accessible Housing Provision

- 06.9.19** The proposals have been designed to ensure that all new homes meet the highest standards of accessibility and adaptability in line with Building Regulations M4(2) and M4(3). The development ensures that 100% of dwellings comply with M4(2) standards, meaning all homes are designed to be accessible and adaptable, capable of meeting the needs of residents as they change over time. These homes include features such as level thresholds, wide circulation zones, and bathrooms that can be adapted for future use, supporting independent living and long-term occupancy.
- 06.9.20** 15% of the 65 affordable extra care homes, and 13% of the affordable general needs homes will meet the requirements of M4(3) standards for wheelchair users, so that overall 14% of all social rent homes meet the M4(3) standard. Adaptations will be carried out on a case-by-case basis to reflect the needs of each individual residents, either when the move in or as their needs change during their tenancy.
- 06.9.21** Overall, 10% of the dwellings in the scheme are fully compliant with M4(3) standards, meaning they are designed to be wheelchair user dwellings. These units are either fully accessible at the point of completion or are easily adaptable without structural alteration. The M4(3) homes are distributed across the Site and tenure types, ensuring equitable access and promoting inclusive, mixed communities. Each of these dwellings provides step-free access from the street or communal areas through to the home, with layouts designed to accommodate wheelchair circulation in all rooms and accessible bathroom and kitchen facilities as required.
- 06.9.22** The M4(3) homes are distributed as follows:

Dwelling Size	Extra Care Affordable	General Needs Affordable	Open Market
1B2P W	10	0	4
2B3P W	0	7	6
2B4P W	0	0	0

- 06.9.23** The scheme integrates accessible dwellings seamlessly within the overall development, avoiding segregation by type or tenure. All buildings are served by lifts providing step-free access to all floors, and the public realm is designed to be fully navigable for wheelchair users and others with mobility impairments. The wider site includes level access routes, tactile paving where necessary, and resting places within the public realm. These measures ensure that residents and visitors of all ages and abilities can move safely and comfortably through the Site. Collectively, the scheme delivers a fully inclusive residential environment that anticipates the diverse needs of its future occupants

### Tenure Integration and Community Housing

- 06.9.24** The proposed development adopts a tenure-blind approach. Affordable and market homes are integrated across the development and designed to an identical external specification. There is no visual distinction in terms of entrances, materials, detailing, or architectural treatment. This integration supports social inclusion, avoids physical or perceptual segregation, and aligns with best practice and policy requirements in delivering mixed communities.

### Supporting Information

- 06.9.25** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement (PRP)
- / LR12 Landscape Statement (BDP)
- / LR48 Health Impact Assessment (Trium)

## 06.10 COMMUNITY USES

### Planning Policy

- 06.10.1** London Plan Policy GG1 (Building strong and inclusive communities) required new development to provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.
- 06.10.2** RBKC Policy SI1 (Social Infrastructure and Facilities) supports the delivery of new community and social infrastructure where it meets identified need and is accessible, inclusive, and well-located to serve the local community. Proposals for new facilities are expected to demonstrate high-quality, flexible design that enables multiple uses and long-term adaptability, while contributing positively to the surrounding area. The co-location of services is also encouraged to promote efficient use of space and improve access for users.
- 06.10.3** RBKC Policy HO3 (Community Housing) requires that schemes that include 100 or more community homes must carry out a community space audit and include community space within the development proposal where there is a demonstrable need.
- 06.10.4** LBHF Policy CF1 (Supporting Community Facilities and Services) supports the provision of new community facilities, particularly where they meet identified needs and contribute to the health, wellbeing, and cohesion of local communities. It promotes co-location and the multifunctional use of spaces to maximize utility and efficiency.
- 06.10.5** LBHF Policy CF2 (Enhancement and Retention of Community Uses) seeks to protect and enhance community facilities by resisting the loss of existing provision and encouraging new facilities that meet local needs. The introduction of new community space supports the objective of ensuring accessible, high-quality facilities across the borough and contributes to meeting the needs of a growing and diverse population, consistent with the policy's aims.

### Application Scheme

- 06.10.6** The proposed development includes a dedicated 274.3 sqm GIA community facility located on the northern face of the community square, in the heart of the scheme. Access will be from the central courtyard.
- 06.10.7** The space is designed to be flexible, inclusive, and accessible to a wide demographic, accommodating a range of potential uses including social events, educational activities, and local service provision for both the extra care residents and the wider community. The ground floor location ensures visibility and ease of access, with attractive views out into the new community square, helping to promote integration with the wider neighbourhood. The facility will be managed to enable multiple forms of community participation, supporting both formal group activity and more informal social interaction.

## Supporting Information

**06.10.8** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement (PRP)

## 06.11 DESIGN

### Planning Policy

- 06.11.1** London Plan Policy D3 (Optimising site capacity through the design-led approach) emphasizes a design-led approach to optimize site capacity, making the best use of land by considering design options that respond to the Site's context and capacity for growth. Developments should enhance local context through appropriate form and land use, encourage active travel, and be well-connected to public transport and amenities. They should facilitate efficient servicing, achieve safe and inclusive environments, and offer high-quality, sustainable designs. Higher density should be promoted in well-connected areas, with incremental densification encouraged elsewhere. Proposals must also consider the character and distinctiveness of the locality, aiming for high architectural quality and sustainability standards.
- 06.11.2** London Plan Policy D4 (Delivering good design) requires major development proposals to ensure high-quality design and placemaking. Proposals must include design and access statements demonstrating compliance with the London Plan's design requirements. Scrutiny by borough planning and design officers and a design review process are required for large or tall buildings, with independent experts ensuring transparency and adherence to recommendations.
- 06.11.3** London Plan Policy D10 (Basement development) requires that basement development proposals address flood risk, land instability, and the cumulative impacts of multiple basements in an area. Proposals must ensure they do not harm the structural stability of existing buildings or the amenity of neighbouring properties, and they should incorporate sustainable design measures such as natural ventilation and drainage. The policy emphasises the need for developments to maintain the character and scale of the surrounding built environment and to demonstrate that any adverse impacts have been properly mitigated through robust assessment and construction management plans.
- 06.11.4** RBKC Policy HO1 (Delivery and protection of homes) recognises the importance of making effective use of land. RBKC must ensure that each site that comes forward is optimised in its potential for housing delivery using a design led approach. This would make the best use of our sites and deliver more homes without compromising on quality.
- 06.11.5** RBKC Policy CD1 (Context and Character) requires all development to respect the local context and character of the area. Development should preserve or enhance the character and appearance of conservation areas and protect heritage assets.
- 06.11.6** RBKC Policy CD2 (Design Quality, Character and Growth) requires all development to achieve the highest standards of architectural and urban design. It promotes well-proportioned, well-detailed, and visually attractive buildings that demonstrate a clear design concept. The policy emphasises high-quality materials, craftsmanship, and coherent design that enhances the experience of those using the building and its surroundings. It resists poor-quality or generic design, instead requiring thoughtful responses to context and an ambition for excellence in every development.

**06.11.7** LBHF Policy DC1 (Built Environment) requires all development to be of a high design quality that respects and enhances the character, context, and identity of the surrounding area. Proposals must respond positively to the local environment, including townscape, historic context, and architectural language. They should ensure a coherent urban form, be human in scale, and incorporate sustainable design principles. New development must create safe, attractive, and accessible environments, with particular attention to layout, scale, massing, materials, detailing, and the relationship between buildings and spaces.

**06.11.8** LBHF Policy DC2 (Design of New Build) requires all new build developments to exhibit high-quality design that respects the local context, contributes positively to the townscape, and enhances the character and appearance of the area. Proposals must demonstrate excellence in architecture and urban design, respond sensitively to scale, height, massing, and form, and ensure a coherent streetscape. Developments must create safe, accessible, inclusive, and sustainable environments, integrate with existing infrastructure and public realm, and incorporate durable, low-impact materials that contribute to long-term environmental performance.

#### Contextual Design

**06.11.9** The proposed development responds to Lots Road context through a detailed and layered approach that draws on the distinctive characteristics of the Site and surrounding urban fabric. The proposals respect the historic grain and evolution of the Site, particularly the legacy of the canal, dockside, and railway uses that have shaped its layout and built form. This is achieved through a series of interconnected character areas, each responding to specific local influences and relationships, including adjacent conservation areas, listed buildings, and creekside conditions.

**06.11.10** The contextual design of the proposed scheme at Lots Road South responds directly to its unique position at the boundary of the Royal Borough of Kensington and Chelsea and the London Borough of Hammersmith and Fulham. The Site lies within a transitional zone, bordered by the industrial heritage of the former Lots Road Power Station, the regenerated Chelsea Waterfront, and traditional Victorian terraces. The proposals acknowledge and integrate this diverse context by adopting a varied massing strategy that bridges the lower-rise heritage streetscapes to the east with the taller, modern developments to the south and west. The architectural response employs robust materials and façade articulation that reference the industrial character of the area while introducing contemporary elements to reflect the evolving urban grain. Key views, conservation areas, and sensitive interfaces such as with Heatherley's School of Fine Art have informed the building heights, articulation, and set-backs across the Site.

#### Architectural Quality

**06.11.11** The Application Scheme demonstrates a considered and coherent design approach that draws from the Site's industrial heritage and urban context. The architectural expression is deliberately varied to reflect the character of each development plot while maintaining an overarching consistency in scale, rhythm, and material language. This creates a unified identity while avoiding monotony. Building heights, massing, and articulation respond directly to the surrounding townscape and key vistas, including the Thames and adjacent conservation areas, ensuring a legible and contextually embedded composition.

- 06.11.12** The architectural quality is defined by its context-driven massing, high-grade materials, and attention to detail. The buildings are articulated into five distinct blocks with varied heights and typologies to respond sensitively to the surrounding townscape, including adjacent conservation areas and the industrial legacy of the former power station. The elevations use a robust brick-led material palette, complemented by contemporary detailing, to reference the Site's historic warehouse character while delivering a modern identity. Fenestration patterns, bay structures, and brickwork modulation have been carefully developed to introduce rhythm and scale, ensuring the facades are rich in texture and visual interest.
- 06.11.13** At ground level, architectural quality is reinforced by the activation of all frontages through a mix of entrances, glazing, and varied commercial units that enhance the streetscape. The integration of a new creekside promenade and a central green square contributes to the overall legibility and placemaking of the development, with architecture and landscape working cohesively to define spaces. The design includes generous floor-to-ceiling heights, high-quality residential layouts with strong dual aspect provision, and a clear visual hierarchy across the buildings. The result is a coherent and well-resolved architectural response that balances contextual sensitivity with contemporary aspirations.

#### Public Realm Quality

- 06.11.14** The Application Scheme strongly prioritises public realm quality by establishing a coherent and legible spatial framework composed of clearly defined streets, open spaces, and transition zones. The masterplan introduces a permeable urban structure that reconnects the Site with its surroundings, improving access and visibility from Lots Road and Chelsea Creek. The main north–south route, a central organising spine, provides a clear and intuitive pedestrian connection through the Site, integrating with new east–west links that open up vistas and enhance wayfinding.
- 06.11.15** Open spaces are layered across the scheme to accommodate a range of uses, from the principal community square in the centre to the smaller intimate courtyard on the northern edge, and green buffers along the creek edge. These spaces are deliberately varied in scale and character, offering visual relief and encouraging activity throughout the day. Active frontages are promoted through the placement of ground floor retail, workspace, and residential entrances along primary pedestrian routes, supporting animation and surveillance. Clear thresholds between public and private realms are established via elevation changes, landscaping, and transitional zones such as or communal lobbies.

#### Functional Design

- 06.11.16** The proposed layout accommodates a coherent hierarchy of public, semi-public, and private spaces, ensuring clarity in movement and use. Residential buildings are arranged to maximise dual-aspect dwellings where feasible, with circulation cores placed to support logical, compact floorplans. This configuration supports operational efficiency and promotes legibility throughout the scheme.
- 06.11.17** Natural surveillance is achieved through active frontages on ground floors, particularly along key routes and the public realm. Entrances to residential buildings, commercial units, and community spaces are positioned to

animate the street and contribute to the sense of safety. Balconies, windows, and communal terraces overlook public spaces, reinforcing passive oversight and social interaction.

**06.11.18** Inclusive access is embedded into the design with step-free routes throughout the public realm, level building entries, and lifts serving all residential floors. The proposals include accessible homes in line with policy requirements, and attention is given to legibility and ease of navigation across the Site.

**06.11.19** The Site servicing strategy prioritises efficiency, safety, and minimal disruption to the public realm. Deliveries and servicing take place from both Lots Road and on site via a one-way loop through the Site. Refer to the Transport Statement and Draft Delivery and Servicing Plan for further details. The scheme includes provision for fire tender access, with routes designed in accordance with relevant regulations to serve all buildings effectively. Environmental design principles are incorporated through building orientation, facade articulation, and integration of green infrastructure. The layout supports natural ventilation and daylighting, while roofs and terraces are designed to accommodate planting and sustainable drainage systems. These features contribute to thermal performance, biodiversity, and climate resilience within the built form.

#### Supporting Information

**06.11.20** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement (PRP)
- / LR41 Heritage, Townscape and Visual Impact Assessment (Montagu Evans)
- / LR26 Transport Assessment (Stantec)
- / LR28 Outline Delivery and Servicing Strategy (Stantec)

## 06.12 HEIGHT AND MASSING

### Planning Policy

- 06.12.1** London Plan Policy D9 (Tall buildings) requires boroughs to define what constitutes a tall building within the local context, ensuring it is not less than six storeys or 18 meters in height. Boroughs must identify suitable locations for tall buildings. Part C of the policy sets out visual, functional and environmental impacts that proposals for tall buildings must be assessed against.
- 06.12.2** This means that the Application Scheme will be considered a tall building and should be assessed against the requirements of London Plan Policy D9.C, RBKC Policy CD8 (Tall Buildings) and LBHF Policy DC3 (Tall Buildings).
- 06.12.3** RBKC Policy CD2 (Design Quality, Character and Growth) requires that the height and massing of new development respond positively to the prevailing building heights and urban grain of their context. Proposals must ensure that any increase in height is justified by the character of the surrounding area and contributes to a coherent townscape. Developments should avoid excessive bulk and must step down sensitively where appropriate to respect the scale of adjacent buildings.
- 06.12.4** RBKC Policy CD8 (Tall Buildings) sets out a restrictive approach, identifying that tall buildings are generally inappropriate in the borough due to its historic character, predominantly low-rise urban form, and dense townscape. Tall buildings are defined as 21m or more in height from the ground level to the top of the building<sup>86</sup> (as measured externally) for the area occupied by the site. The policy permits tall buildings in very limited locations identified on the Policies Map and, under limb (D) in relevant site allocations, which includes SA6 Lots Road South.
- 06.12.5** Proposals for tall buildings are required to demonstrate architectural excellence, preserving heritage assets and views, contributing positively to the skyline, and avoiding harmful impacts such as overshadowing or wind tunnelling. Proposals must also deliver public benefits, integrate well with surroundings, and not compromise local distinctiveness or character.
- 06.12.6** RBKC Policy SA6.E (Lots Road South) states that the indicative building heights for Lots Road South 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, however this is indicative only and is subject to further testing.
- 06.12.7** The Lots Road South Design brief SPD sets out two requirements for height in the development principle. Principle 3 states that there should be a series of buildings along Lots Road with modest variation in form, rather than a uniform block, at a height that respects the scale of existing buildings on Lots Road. Principle 5 states that the development should locate taller buildings away from Lots Road, to more suitable parts of the Site. This is to ensure building heights along Lots Road are kept at a level that respects the character of the street. The Design Brief SPD does not specify maximum building heights. It is adopted by RBKC and not LBHF.

**06.12.8** LBHF Policy DC3 (Tall Buildings) sets a presumption against tall buildings unless located in identified areas with appropriate townscape context. Tall buildings are defined as those which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline, will be resisted by the council. It requires proposals to demonstrate exceptional architectural quality, a positive contribution to the skyline, and no adverse visual, environmental, or heritage impact. Developments must relate well to the scale, grain, and character of the surrounding area, ensure public realm benefits, and avoid overshadowing or wind microclimate issues. Tall buildings are only considered acceptable in locations defined in the Local Plan and must meet stringent design and impact assessment criteria.

#### Proposed Height and Massing

**06.12.9** The Application Scheme introduces a varied height strategy across the Site, aligning with local policy and urban context. Along the Lots Road frontage, the scheme comprises two five-storey blocks (Blocks D and E), responding to the adjacent Lots Village Conservation Area and existing building heights found further north along the west side of Lots Road, and respecting the six to ten storey height range prescribed in RBKC's Site Allocation SA6 and the Lots Road South SPD. These buildings contribute to the active street frontage while ensuring a stepped-down transition to the conservation area. Behind them, the scheme rises progressively, with three taller blocks (Blocks A-C) positioned to the west near the railway line. These buildings range from nine to 13 storeys and are primarily located within LBHF, forming a massing strategy that places greater height away from the street and closer to existing taller developments such as Chelsea Island and Kings Road Park.

**06.12.10** The design approach reflects the area's evolving built form, particularly along the western edge where former industrial sites are being redeveloped with taller buildings. The 13-storey element at the southern end aligns with recent precedents and is intended to form a coherent relationship with the emerging skyline. Visual and townscape assessments acknowledge that the taller elements will contrast with the predominantly two- and three-storey terraced housing in the conservation area, but this contrast is considered acceptable and in some views beneficial. The development's materiality and articulation are used to break down massing and enhance legibility, contributing positively to the Site's integration into its varied context.

#### London Plan Policy D9

**06.12.11** Since the Application Scheme is for a tall building on a non-designated site it should be assessed against the requirements of London Plan Policy D9.C. The High Court ruling in the Master Brewer case confirmed that there is no wording which indicates that Part A and/or Part B of Policy D9 are gateways, or pre-conditions, to Part C.

**06.12.12** Part C of Policy D9 sets out criteria against which the impact of tall buildings is to be assessed and it is necessary to consider the scheme against all parts of Policy D9 in assessing compliance.

Policy D9.C Requirement	Scheme Response
<b>Visual Impact</b>	
The views of buildings from long range views	The proposed development has been carefully designed to respect its appearance in long-range views. From distant vantage points such as the River Thames or Brompton Cemetery, the development appears as part of an established and varied skyline, largely filtered or obscured by intervening mid-ground and foreground buildings. Its massing and architectural composition are consistent with existing tall buildings in the vicinity, ensuring the development reinforces the spatial hierarchy of the area and integrates into the broader townscape without disrupting key strategic or heritage views.
The views of buildings from mid range views	Mid-range views of the proposed development reveal the taller Blocks A–C (nine to 13 storeys) rising behind and above the existing two to three storey buildings of the Lots Village Conservation Area. These mid-range views, particularly from within the residential streets of Lots Village, demonstrate a clear contrast in scale. However, the separation between buildings, combined with careful material selection, fenestration and composition, mitigates this impact by visually breaking down the mass and tying the development into its urban context. The resulting effect reinforces a legible townscape hierarchy without undermining the area's character or heritage significance.
The views of buildings from immediate views	In immediate views, particularly when travelling north or south along Lots Road, the proposed development will primarily present as five-storey buildings with active frontages, street trees, widened pavements, and new hard landscaping. These elements will form the dominant visual impression and contribute positively to the local townscape. The taller elements of the scheme are set back from Lots Road and will be largely screened in immediate views, ensuring the new frontage integrates with the established scale and character of the Lots Village Conservation Area and enhances visual amenity at street level.
Reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding	The proposed development reinforces the spatial hierarchy of the local and wider context by locating taller buildings to the west of the Site adjacent to the railway line, in alignment with existing and emerging taller developments such as Kings Road Park and Chelsea Island. This creates a transition in scale that steps down to five-storey blocks along Lots Road, respecting the finer grain and lower-rise character of the Lots Village Conservation Area. The arrangement aids legibility and wayfinding by framing a new public route through the Site, visually

	guiding movement from Lots Road to the creek edge, and anchoring key views through varied massing and distinct architectural composition.
Architectural quality and materials should be of an exemplary standard	The Application Scheme demonstrates architectural quality and materiality of an exemplary standard through a considered massing strategy, refined detailing, and a sensitive response to context. The buildings employ high-quality brickwork in a traditional yet varied palette, ensuring visual interest and cohesion across the scheme. Fenestration and composition have been carefully articulated to break down mass and enhance legibility in views at all scales. The five-storey elements present an active, well-composed frontage to Lots Road, while the taller blocks, set back from the street, are carefully modulated in height and form to reinforce the area's emerging skyline without overwhelming their surroundings. The design has evolved through extensive consultation and responds directly to the Site's industrial heritage, delivering a robust, contextually rooted architectural language.
Avoid harm to the significance of London's heritage assets and their settings.	The proposed development avoids harm to the significance of London's heritage assets and their settings through a considered massing and design approach that responds to local context and visual sensitivity. The five-storey blocks fronting Lots Road respect the scale of the adjacent Lots Village Conservation Area, while the taller elements are positioned adjacent to the railway, in a less sensitive zone with existing tall buildings nearby. The verified views demonstrate that changes to the settings of nearby designated heritage assets, including Brompton Cemetery and the Sands End and Lots Village Conservation Areas, do not harm their significance. The conservation areas are preserved, and where changes are visible, they reflect the evolving urban context without undermining the architectural or historic value of the assets
Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site	Not applicable to scheme.
Buildings near the River Thames, particularly in the Thames Policy Area, should protect and	The proposed development enhances the open quality of the river by retaining and re-landscaping the creek edge, creating new intertidal landscaping and delivering biodiversity improvements. Additionally, the development provides publicly accessible realm along the creek and

enhance the open quality of the river and the riverside public realm	includes new pedestrian routes and a community square that improve permeability and access to the riverside environment, supporting a more active and welcoming public realm.
Buildings should not cause adverse reflected glare	The proposed development does not cause adverse reflected glare. This is achieved through careful consideration of materiality, with brick façades in a traditional and varied colour palette that reduce reflectivity. The fenestration and architectural composition are designed to break down scale and integrate visually with the surrounding context, avoiding large expanses of reflective surfaces that could result in glare. Verified views and visual assessments confirm the development integrates into the skyline and does not introduce visual discomfort or reflective glare in short, medium, or long-range views.
Buildings should be designed to minimise light pollution from internal and external lighting.	The planning application is accompanied by LR32 Lighting Strategy. The lighting strategy ensures that external lighting is sensitively designed to avoid excessive illumination, with lighting directed downward and controlled to limit spill onto adjacent buildings and the night sky. Internally, the layout and specification of glazing and fixtures aim to reduce unnecessary light spill, maintaining appropriate levels of illumination while mitigating visual impacts, particularly during nighttime hours.
<b>Functional Impact</b>	
The internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.	The Application Scheme includes robust fire safety and occupant protection measures throughout the scheme. The design incorporates clear and legible emergency exit routes, with a well-defined fire and emergency access strategy that ensures safe egress from all blocks. Materials and construction detailing have been developed in conjunction with fire engineering consultants to ensure compliance with fire safety regulations and the long-term safety of residents. Additionally, the development includes Secure by Design principles and provides inclusive, accessible routes for all users, demonstrating a comprehensive approach to safety embedded in both internal layouts and external design strategies. The application is also supported by a fire statement demonstrating compliance with policy and regulations.
Buildings should be serviced, maintained and managed in a manner that will preserve their	A dedicated servicing and deliveries strategy is in place, which demonstrates an overall reduction in the number of delivery and servicing trips over the course of the day, with an element of these taking place on-site, and others taking place on Lots Road.. Access is

<p>safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.</p>	<p>provided through the Site via a route across the shared surface. The number of trips moving through the Site and the speeds they will move at are low, providing ensuring safe, unobtrusive operations. Waste storage and collection, as well as cycle storage, are integrated into the building layouts at ground and basement levels, with clear, efficient access routes. The development is car-free (except for blue badge bays), further reducing traffic disruption and preserving safety for pedestrians and cyclists. Management arrangements are structured to ensure long-term maintenance of public spaces, building fabric, and safety systems without inconvenience to residents or the surrounding community.</p>
<p>Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas</p>	<p>The Application Scheme will provide clearly defined, legible, and inclusive entrance points and active ground floor frontages distributed around the Site, particularly along Lots Road and the new community square. The layout ensures permeability and connectivity, encouraging movement through the Site while avoiding isolation or dead spaces. The commercial and community uses are positioned to promote peak-time activity and natural surveillance, with the residential blocks and extra care housing oriented to support everyday use of public realm areas. The design strategy integrates ground floor uses and access routes that are resilient to overcrowding and aligned with a walkable, accessible urban grain.</p>
<p>It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.</p>	<p>The Site benefits from a PTAL rating of 3–4, with close access to Imperial Wharf Overground Station, Fulham Broadway Underground Station, and multiple bus routes, ensuring strong public transport connectivity. The scheme is car-free (except for accessible parking), prioritises walking and cycling through high-quality public realm and the provision of 382 long-stay cycle spaces in secured stores for residential and 19 long stay cycle places in the commercial units. 22 short-stay cycle parking spaces have been agreed with the LPA's to be provided in the landscape, promoting healthy sustainable travel. Local services, shops, schools, and healthcare facilities are within walking distance, supporting sustainable patterns of living and working.</p>
<p>Jobs, services, facilities and economic activity that will be provided by the development and the</p>	<p>The Application Scheme will deliver 2,038 sqm of flexible commercial and community floorspace, including affordable commercial space and a new community centre, designed to accommodate a range of uses aligned with the character of the Lots Road Employment Zone. These</p>

<p>regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area.</p>	<p>uses will generate local jobs, support small businesses, and provide essential community services, creating a vibrant and active ground floor environment. The design integrates these elements prominently within the public realm, particularly around the new public square, ensuring accessibility and visibility. This mix of uses, combined with high-quality public realm improvements, positions the scheme as a catalyst for economic and social regeneration across the surrounding area.</p>
<p>Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings</p>	<p>The Application Scheme will not interfere with approaches to any of London's airports.</p> <p>The proposal's massing, orientation, and separation distances are such that no overshadowing impact on solar panels of neighbouring buildings has been identified, ensuring compliance with the policy requirement.</p>
<p><b>Environmental Impact</b></p>	
<p>Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.</p>	<p>The proposed development incorporates a massing strategy that mitigates wind impacts, preserves daylight and sunlight access, and ensures comfortable temperature conditions in and around the Site. A comprehensive Wind and Microclimate Assessment confirms that the public realm, including the creekside promenade and new public square, will remain suitable for their intended recreational use. The scheme also maintains appropriate separation between buildings and uses varied heights and stepped forms to optimise sunlight penetration, safeguard the amenity of open spaces, and ensure a comfortable microclimate throughout the development. The application is also supported by a full daylight, sunlight and overshadowing assessment, demonstrating an acceptable impact.</p>
<p>Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.</p>	<p>The proposed development has been subject to a detailed wind and microclimate assessment which confirms that the massing and orientation of buildings will not create adverse wind conditions at street level. The arrangement of blocks supports natural air movement across the Site, aiding the dispersion of pollutants while maintaining comfortable pedestrian conditions. The design avoids excessive downdrafts or</p>

	turbulence, ensuring that street-level air quality and usability of public spaces are not compromised.
Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.	The proposed development has been designed to minimise noise impacts from air movement, servicing machinery, and building uses through careful placement of plant, acoustic mitigation measures, and high-quality façade design. Plant and mechanical equipment are located within screened and acoustically treated enclosures, while servicing areas are positioned away from key public open spaces. These measures ensure that noise levels do not detract from the comfort, usability, or enjoyment of the new public square, creekside promenade, and landscaped areas surrounding the buildings.
<b>Cumulative Impacts</b>	
The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.	In accordance with London Plan Policy D9.C, the proposed development carefully considers the cumulative visual, functional, and environmental impacts of existing, consented, and emerging tall buildings in the surrounding area, including nearby developments at Chelsea Waterfront and Imperial Gasworks. The height, form, and massing have been tested through townscape and environmental assessments to ensure appropriate integration with the urban context. Taller elements are concentrated away from Lots Road to mitigate visual intrusion and overshadowing, while stepped building heights and articulated façades reduce massing impact. Design responses, such as wind mitigation, daylight optimisation, and flood resilience, have been incorporated from the outset to ensure that mitigation measures are embedded, not retrofitted.

**06.12.13** In conclusions the criteria set out in Policy D9.C are considered in the application documentation submitted in support of this planning application.

RBKC Policy Response

**06.12.14** The proposed scheme at Lots Road South responds comprehensively to RBKC Policy CD2 (Design Quality, Character and Growth) by adopting a context-led approach to scale and massing. The design introduces lower five-storey blocks along the Lots Road frontage, maintaining alignment with the prevailing urban grain and respecting the scale of adjacent development in the Lots Village Conservation Area. Height increases are

located progressively away from Lots Road, culminating in taller elements (up to 13 storeys) towards the creek edge, consistent with the broader urban morphology and nearby consented schemes such as Chelsea Island and Kings Road Park. The variation in form and stepping of blocks prevents excessive bulk and allows the development to contribute positively to townscape coherence, while elevational articulation, high-quality materials, and modulation along street frontages reinforce local character and architectural distinction.

**06.12.15** With regard to RBKC Policy CD8 (Tall Buildings), taller elements are confined to the Site's southern and western extents, away from Lots Road, in direct response to SPD principles 3 and 5. The taller elements are primarily located within LBHF, outside of the SA6 site allocation policy area. The proposal demonstrates architectural excellence and avoids detrimental environmental impacts, with wind and overshadowing assessments confirming acceptable conditions. Visual assessments verify that long- and mid-range views are managed effectively, and that the skyline presence integrates with adjacent tall buildings without dominating sensitive receptors. The proposal delivers substantial public benefits through affordable housing, community facilities, new public spaces, and ecological enhancements along the creek edge, supporting a planning balance strongly in favour of approval

#### LBHF Policy Response

**06.12.16** Although the Site within LBHF is not identified as a suitable location for tall buildings in the borough's Local Plan, the proposal justifies its acceptability by reference to the cumulative context of surrounding consented developments, the high design quality, and the urban design benefits delivered. Critically the scheme is directly adjacent to the Imperial Gasworks site, approves significantly taller buildings, up to 37 storeys.

**06.12.17** The proposals address environmental impacts such as overshadowing, daylight and sunlight, and wind microclimate through comprehensive technical assessments. Landscaping and the creation of intertidal habitat at the creek edge also bring ecological and environmental enhancements. Overall, while not located in a designated tall building zone, the scheme satisfies the rigorous requirements of Policy DC3 by mitigating adverse impacts, integrating into the local context, and securing significant public and townscape benefits

#### Supporting Information

**06.12.18** Please see the following documents submitted in support of this planning application for further details:

- / LR11 Design and Access Statement (PRP)
- / LR23 Noise and Vibration Impact Assessment (Stantec)
- / LR25 Wind & Microclimate Assessment (GIA)
- / LR32 Lighting Strategy (LFB)
- / LR40 Fire Statement (BB7)
- / LR41 Heritage, Townscape and Visual Impact Assessment (Montagu Evans)

## 06.13 TOWNSCAPE AND VIEWS

### Planning Policy

- 06.13.1** London Plan Policy HC3 (Strategic and Local Views) requires planning applications to assess the impact on designated strategic views, including significant buildings, landscapes, or riverscapes seen from publicly accessible locations. The policy requires the protection of identified landmarks that contribute aesthetically, historically, or culturally to these views. Development proposals must consider their position within the foreground, middle ground, or background of the view and adhere to the London View Management Framework ('LVMF') Supplementary Planning Guidance.
- 06.13.2** London Plan Policy HC4 (London View Management Framework) requires proposals to not harm and should seek to enhance the characteristics of Strategic Views and their landmark elements.
- 06.13.3** RBKC Policy CD1 (Context and Character) requires all development to respect the local context and character of the area. It must respond positively to the distinctiveness of the borough's townscape, including its pattern and grain, form and density, scale and height, and its relationship to public and private spaces. It must also consider views, vistas, landmarks, and topography, ensuring that proposals integrate harmoniously with their surroundings and contribute positively to the local environment
- 06.13.4** RBKC Policy CD15 (Views) seeks to protect and enhance important local and strategic views, ensuring that new development does not harm the character, composition, or visibility of these views. The policy applies to both designated and undesignated views that contribute to the borough's heritage and townscape quality. Proposals must demonstrate that they respect view corridors, preserve the setting of landmarks, and do not introduce visual intrusion or clutter. Where appropriate, visual impact assessments may be required to support applications.
- 06.13.5** LBHF Policy DC7 (Views and Landmarks) seeks to preserve and enhance the visual integrity of strategic and local views, townscape, and significant landmarks across the borough. Development proposals must respect and reinforce key views, including those towards and from heritage assets, conservation areas, and landmarks. The policy also requires proposals to consider the impact on the setting and skyline of important buildings and to avoid visual intrusion that would harm identified views or the prominence of significant landmarks. Proposals should demonstrate how they preserve or enhance visual connections and contribute positively to the townscape character.

### Protected Views

- 06.13.6** The verified views assessment confirms that there are no identified protected Strategic Views from the London View Management Framework (LVMF) that would be impacted by the proposed development at Lots Road South. However, there are views from local heritage assets and conservation areas that are considered sensitive. The most relevant include mid- to long-range kinetic views from Brompton Cemetery, a Grade I Registered Park and Garden with a Grade II\* listed chapel. From within the cemetery, a glimpse of the development appears in the background of the domed chapel, visible briefly above the treeline and beyond

intervening 20th-century buildings. This view is short in duration and diminishes entirely upon approaching the chapel, leading to the conclusion that the proposal would not harm the appreciation or significance of the cemetery or its listed structures.

**06.13.7** The proposed scheme has responded to relevant policies by carefully locating taller blocks (9 to 13 storeys) adjacent to the railway line, in an area of lower sensitivity, while stepping down in height to five storeys along Lots Road, where it fronts the Lots Village Conservation Area. This responds directly to RBKC Policy CD1 and CD15, LBHF Policy DC7, and London Plan Policies HC3 and HC4. The development incorporates architectural articulation, material variation, and permeability through the Site, mitigating visual intrusion and contributing positively to the streetscape. Where visible in local and kinetic views, the development is assessed as neutral or beneficial in impact, with no harm identified to local or strategic views or to the setting of designated landmarks.

#### Townscape Impact

**06.13.8** The proposed development responds appropriately to townscape and view-related policies by carefully integrating into both strategic and local contexts. The proposals have been informed by accurate visual representations and kinetic sequences prepared by Miller Hare, which demonstrate that in long-range views such as those from the River Thames, the development would be largely occluded by foreground and midground structures. Where visible, it forms a legible and coherent component of the wider urban skyline, aligning with the spatial hierarchy and reinforcing established view compositions. No designated strategic views identified in the London View Management Framework are harmed. From mid-range and immediate views, particularly along Lots Road, the design prioritises a sensitive transition in scale, stepping from five-storey elements adjacent to the conservation area up to thirteen-storey blocks along the railway, maintaining coherence with nearby taller developments like Chelsea Island and Kings Road Park. This mitigates potential visual disruption and supports townscape legibility.

**06.13.9** The Application Scheme respects the character and context of both RBKC and LBHF through a contextual approach to massing, materiality, and permeability. The five-storey buildings on Lots Road respect the scale of the Lots Village Conservation Area and adhere to the height limits set out in RBKC's Site Allocation SA6 and SPD. The taller elements are positioned to the west, adjacent to the railway, a location identified in planning guidance as more appropriate for height. The composition avoids visual intrusion into sensitive vistas and instead delivers a clearly articulated streetscape with varied building lines and active frontages.

#### Supporting Information

**06.13.10** Please see the following documents submitted in support of this planning application for further details:

/ LR41 Heritage, Townscape and Visual Impact Assessment (Montagu Evans)

## 06.14 HERITAGE

### Planning Policy

- 06.14.1** London Plan Policy HC1 (Heritage conservation and growth) requires proposals affecting heritage assets to demonstrate a clear understanding of the historic environment and integrate this understanding into the planning and design process. Proposals should respect and conserve the significance of heritage assets and their settings, actively managing cumulative impacts. Proposals must also identify archaeological assets, avoid or minimize harm, and integrate heritage considerations early in the design process to deliver positive benefits.
- 06.14.2** RBKC Policy CD3 (Heritage Assets) requires that development affecting heritage assets, including conservation areas, listed buildings, and locally listed buildings, must preserve or enhance their significance. Proposals should demonstrate a clear understanding of the asset's significance and its contribution to the borough's historic environment.
- 06.14.3** Any harm or loss to heritage assets must be justified and outweighed by public benefits, and developments must be of high-quality design that respects the character and appearance of the heritage asset and its setting. The policy promotes the use of traditional materials and details where appropriate and expects developments to follow national heritage guidance.
- 06.14.4** RBKC Policy CD4 (Heritage Assets – Conservation Areas) requires that development within conservation areas must preserve or enhance their character or appearance. Proposals must respect the architectural and historic significance of the area, including building lines, layout, plot widths, and materials. Any demolition is strictly controlled and will only be permitted where it can be demonstrated that it will not harm the character of the conservation area. New development should be of high-quality design that complements the prevailing character, and alterations must not diminish the special interest of buildings or their contribution to the area.
- 06.14.5** RBKC Policy CD6 (Scheduled Monuments and Archaeology) requires developments to protect the significance of scheduled monuments and archaeological assets, both designated and non-designated. Proposals must avoid harm to such heritage, and where this is unavoidable, they must provide justification demonstrating that the public benefits outweigh the harm.
- 06.14.6** Developers are expected to assess archaeological potential early in the design process, and where appropriate, to submit desk-based assessments or undertake field evaluations. Preservation in situ is the preferred approach; where not feasible, appropriate recording and mitigation must be secured prior to development.
- 06.14.7** RBKC Policy CD7 (Registered Parks and Gardens of Special Historic Interest) protects Registered Parks and Gardens of Special Historic Interest by requiring development proposals affecting them to preserve or enhance their significance. It resists development that would harm the character, appearance, views, setting, or historical value of these spaces. The policy also seeks to conserve their designed landscape features, spatial qualities, and planting schemes, while ensuring that any changes are sensitive and appropriate to their heritage context .

**06.14.8** LBHF Policy DC8 (Heritage and Conservation) aims to preserve and enhance the borough's historic environment, including conservation areas, listed buildings, locally listed buildings, scheduled monuments, registered parks and gardens, and archaeology. It requires development proposals to respect the setting, character, and significance of heritage assets. The policy encourages high-quality design that integrates with historic context and opposes demolition or unsympathetic alterations unless justified by exceptional circumstances. It also supports the identification and designation of new conservation areas and promotes the positive use and management of heritage assets.

#### Conservation Areas

**06.14.9** The proposed Lots Road South development site lies adjacent to or partially within three conservation areas:

- / Lots Village Conservation Area (RBKC) This lies immediately to the east of the Site. It is characterised by two- and three-storey Victorian terraced housing interspersed with commercial and educational buildings. The character of the area is defined by its historic residential scale and urban grain. The Site lies on the edge of this conservation area but is not identified as contributing positively to it.
- / Sands End Conservation Area (LBHF) A small part of the south-western edge of the Site, adjacent to Chelsea Creek, lies within this conservation area. The area is historically industrial but has been undergoing transition and redevelopment. The Site's land within the conservation area will not accommodate any built form and will instead be re-landscaped and enhanced.
- / Brompton Cemetery Conservation Area and Registered Park and Garden (RBKC) Though not adjacent, it is scoped into the assessment due to its high designation status and theoretical intervisibility with the Site. It includes the Grade II\* listed Anglican chapel and forms an important ceremonial landscape.

**06.14.10** The proposed development is sensitively massed and articulated to respond appropriately to these nearby conservation areas. Along Lots Road, the development steps down to five storeys, aligning with the RBKC's site allocation SA6 and respecting the scale and character of the Lots Village Conservation Area. The taller buildings are placed to the west, adjacent to the railway, following guidance in the Lots Road South SPD which advocates siting height away from sensitive edges.

**06.14.11** For Sands End Conservation Area, the retained and enhanced landscaping at the creek edge ensures no adverse impact; instead, it offers a net enhancement to character and appearance. In relation to Brompton Cemetery, while the taller elements of the scheme may be briefly visible above the tree line when viewed from certain points within the cemetery, this is only for a short duration and does not affect the ability to appreciate the cemetery's design or setting. The impact is considered negligible and not harmful.

**06.14.12** Overall, the proposals are judged to preserve or enhance the character and appearance of nearby conservation areas and comply with statutory and policy requirements including Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and London Plan Policy HC1.

### Listed Buildings

- 06.14.13** The proposed development lies in proximity to several listed buildings and locally listed buildings. These include Brompton Cemetery, which is both a Grade I Registered Park and Garden and a Conservation Area, and contains the Grade II\* listed Anglican Chapel. Other nearby assets include Sandford Manor House (Grade II\* listed) and listed structures associated with the former Imperial Gasworks to the west of the Site. Within the Site itself, the brick warehouse buildings at Nos. 65–69 Lots Road are non-designated heritage assets, assessed as having very low significance due to extensive alteration and a lack of architectural distinction.
- 06.14.14** The proposed scheme has been designed to respond appropriately to the presence of these listed buildings. Its tallest elements, located adjacent to the railway, are situated over 900 metres from Brompton Cemetery and are only briefly visible above the tree line in distant views from within the cemetery. This fleeting glimpse does not compromise the ability to understand or appreciate the significance of the Grade II\* listed chapel or the overall composition of the cemetery. The massing strategy, material palette, and architectural articulation ensure that the development sits within the evolving urban context and does not detract from the significance of nearby listed buildings. As such, the proposals preserve their settings and comply with relevant heritage policy requirements.

### Archaeology

- 06.14.15** The archaeological desk-based assessment and supporting geoarchaeological deposit model for the application proposals confirm that the Site does not lie within any designated heritage assets or Archaeological Priority Areas. The Site has a low archaeological potential for prehistoric, Roman, Saxon, and medieval periods. Evidence of past activity is primarily limited to the post-medieval and modern periods, particularly associated with the 19th-century construction and later infilling of the Kensington Canal and historic landfill. While there is some potential for the presence of post-medieval features such as wharves or revetments within the made ground and channel fill deposits, overall archaeological significance is assessed as low. The geoarchaeological assessment supports this, concluding that no Holocene alluvium or peat deposits are present and that the palaeoenvironmental potential is minimal.
- 06.14.16** Given the limited archaeological significance of the Site and the extent of modern disturbance, the proposed development is acceptable in archaeological terms. The impact of construction can be appropriately managed through a standard archaeological planning condition requiring a watching brief or targeted mitigation. This approach aligns with the requirements of the National Planning Policy Framework, ensuring that any remains of limited significance can be recorded and understood without impeding the delivery of the development. No further geoarchaeological works are required, and residual archaeological interest can be addressed through proportionate post-consent measures.
- 06.14.17** The archaeological desk-based assessment confirms that due to the site's perceived archaeological potential particularly for the Post Medieval and Modern periods further archaeological mitigation measures will be required in association with redevelopment impacts. However these works can be secured by condition and undertaken post-consent rather than requiring pre-commencement investigations.

## Supporting Information

**06.14.18** Please see the following documents submitted in support of this planning application for further details:

- / LR41 Heritage, Townscape and Visual Impact Assessment (Montagu Evans)
- / LR42 Archaeological Desk-Based Assessment (RPS)

## 06.15 DAYLIGHT AND SUNLIGHT

### Planning Policy

- 06.15.1** London Plan Policy D6 (Housing quality and standards) requires proposals to provide sufficient daylight and sunlight to new and surrounding housing, ensuring this is appropriate for the context of the development. It is important to avoid overheating, minimize overshadowing, and maximize the usability of outdoor amenity space.
- 06.15.2** Under RBKC Local Plan Policy CD9, the Council requires all development ensures good living conditions for occupants of new, existing and neighbouring buildings. This includes ensuring that good standards of daylight and sunlight are achieved in new development.
- 06.15.3** LBHF Local Plan Policy HO11 details residential standards to protect existing residential amenities including daylight and sunlight.

### Daylight and Sunlight – Neighbours

- 06.15.4** The Application Scheme has been assessed for its daylight and sunlight impact on surrounding properties, applying the BRE Guidelines with flexibility appropriate to a dense urban context. Due to the low-rise nature of the existing site, surrounding properties currently experience higher-than-average light levels, making any meaningful redevelopment likely to result in reductions. The assessment shows that all surrounding properties except one would experience negligible to minor, non-significant effects in daylight and sunlight.
- 06.15.5** The exception is 118 Lots Road, where moderate to major impacts were recorded. Nonetheless, the retained Vertical Sky Component (VSC) values remain above mid-teen percentages, which are deemed acceptable in dense urban settings. All properties assessed, including Heatherley School of Fine Art, would remain compliant with sunlight targets (APSH), and the overshadowing impacts on amenity areas are considered negligible.
- 06.15.6** For 118 Lots Road, while eight of the windows assessed fall below BRE VSC guidelines, the retained values are still within a tolerable urban range (17.49% to 23.27%). Similarly, most rooms maintain a reasonable daylight distribution, with two rooms performing below expectations but likely serving secondary bedrooms, which are considered less critical. Other properties, such as 116 and 114 Lots Road, 56 and 58 Burnaby Street, and Heatherley School, experience either full compliance or minor deviations in daylight and sunlight, all within acceptable limits. Overall, the scheme meets planning policy expectations for daylight and sunlight in its urban context and is therefore considered acceptable.

### Overshadowing

- 06.15.7** The overshadowing impact of the Application Scheme has been assessed with reference to both internal and external amenity spaces. Externally, the overshadowing effects on neighbouring amenity areas were found to be negligible and not significant. Despite the increased scale of the proposed buildings relative to the existing low-rise context, sufficient sunlight would be retained across all key spaces. The assessment confirms that no neighbouring open spaces would fall below the BRE's recommended thresholds, supporting the conclusion that

overshadowing from the proposed development would have no adverse impact on the usability or enjoyment of those areas

**06.15.8** Internally, the overshadowing analysis focused on the proposed development's own communal amenity areas. The ground floor amenity space would meet the BRE guideline criteria, while the raised podium level would fall slightly short of the target on 21 March, at least 50% of the area would receive 2 hours of sunlight on 25 April and it would receive excellent sunlight during the summer months, when the space is most used. This seasonal variance is typical for urban developments and not considered detrimental. Overall, the overshadowing effects are deemed acceptable in the context of a high-density, urban site and align with local and national planning guidance.

#### Daylight and Sunlight – Internal

**06.15.9** The internal daylight and sunlight assessment demonstrates that the proposed development achieves strong levels of compliance across the five residential blocks. Out of 723 habitable rooms assessed, 526 (73%) meet the BRE and BS EN 17037 target values for daylight which is acceptable in an urban setting. The development has been optimised to maximise daylight where possible, with shortfalls largely confined to isolated rooms beneath projecting balconies. These areas are common in high-density urban schemes and reflect a reasonable balance between internal light levels and the inclusion of balconies for outdoor amenity and solar shading.

#### Supporting Information

**06.15.10** Please see the following documents submitted in support of this planning application for further details:

- / LR37 Daylight – Internal Daylight Assessment (Chancery Group)
- / LR38 Daylight – External Daylight and Sunlight Assessment (Chancery Group)

## 06.16 OVERHEATING

### Planning Policy

- 06.16.1** London Plan Policy SI4 (Managing heat risk) states that development major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 06.16.2** Under RBKC Policy GB5 (Overheating) all developments must minimise overheating risk, reduce reliance on air conditioning in accordance with the London Plan cooling hierarchy. This must be demonstrated in an energy strategy/assessment.

### Application Scheme

- 06.16.3** This accompanying Overheating Assessment prepared by IN2 provides a planning-stage thermal comfort strategy in compliance with Building Regulations Part O and CIBSE TM59. The methodology followed the Mayor of London's passive cooling hierarchy. It prioritised passive measures including optimal orientation, reduced glazing ratios on less favourable elevations, high-performance building fabric, and the use of high albedo materials and green infrastructure. Dynamic thermal modelling, compliant with CIBSE AM11, was carried out using EDSL Tas to assess typical units under standardised weather files and occupancy profiles.
- 06.16.4** To comply with Approved Document O, the design integrates appropriate window aperture strategies and mechanical ventilation with heat recovery ('MVHR'). Window opening assumptions varied by noise risk categories derived from a separate acoustic assessment, which constrained night-time ventilation in affected units. Where acoustic or operational limitations curtailed effective purge ventilation, overheating was mitigated through a combination of external shading from balconies, reduced glazing g-values, and incorporation of tempering coils within MVHR systems. These measures were incrementally modelled and shown to reduce overheating risk to acceptable levels in all rooms.
- 06.16.5** Communal corridors were also assessed for overheating due to the presence of heated pipework. A push-pull smoke ventilation system was used to mitigate corridor temperatures. The final modelling included assessments against more extreme weather years (DSY2 and DSY3), confirming the robustness of the design under future climate scenarios.
- 06.16.6** The scheme demonstrates compliance with both national and London Plan policies on climate resilience, energy efficiency, and internal environmental quality. It meets the criteria of Part O by ensuring indoor temperatures remain within acceptable thresholds during critical hours and seasons, with a strategy responsive to site constraints and planning requirements. The proposed mitigation package will perform satisfactorily under anticipated climate conditions while supporting good acoustic and energy outcomes.

Supporting Information

**06.16.7** Please see the following documents submitted in support of this planning application for further details:

- / LR21 Overheating Assessment (IN2)

## 06.17 MICROCLIMATE

### Planning Policy

- 06.17.1** London Plan Policy D8 requires developments to consider the microclimate created by buildings, including the impact on the public realm and the surrounding area.
- 06.17.2** LBHF Policy DC3 (Tall Buildings) states that development proposals for tall buildings will need to demonstrate that it does not have a detrimental impact on the local environment in terms of microclimate.

### Application Scheme

- 06.17.3** GIA has prepared the accompanying Wind and Microclimate Assessment Report. The report established the wind microclimate conditions at the Site and determines if the wind comfort conditions would be suitable for all intended uses post-development. To identify the likely effect of the proposed development on the pedestrian level wind environment, a 3D CFD model of the development and surrounding site was created. The assessment was then graded against the Lawson Comfort and Safety Criteria.
- 06.17.4** The assessment concludes that there are no wind safety risks associated with the proposed development. Wind comfort conditions would be suitable for all intended uses (or no worse than the baseline conditions) for all thoroughfares, roadways, proposed or existing building entrances, bus stops, proposed and existing seating areas, the Chelsea Academy all-weather football pitches, proposed amenity at ground or podium level and proposed balconies. The inclusion of cumulative schemes makes the conditions generally calmer on and around the Site. There will be no adverse impacts on long term wind microclimate as a result of the proposal.

### Supporting Information

- 06.17.5** Please see the following documents submitted in support of this planning application for further details:

/ LR25 Wind & Microclimate Assessment (GIA)

## 06.18 NOISE AND VIBRATION

### Planning Policy

- 06.18.1** London Plan Policy D14 states that to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should avoid significant adverse noise impacts on health and quality of life. Development should improve and enhance the acoustic environment and promote appropriate soundscapes; separating new noise-sensitive development from major noise sources; and reflect the Agent of Change principle as set out in Policy D13.
- 06.18.2** Policy D13 of the London Plan (Agent of Change) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. It states that new development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without the new use placing unreasonable restrictions on them.
- 06.18.3** RBKC Policy GB8 (Noise and Vibration) furthers the above and notes that the Council will require a Noise and Vibration Impact Assessment to assess the impact of noise and vibration generating sources which affect amenity during the construction and operational phases of development. It further requires development to adhere to the principles outlined within the London Plan.
- 06.18.4** LBHF Policy CC11 (Noise) is consistent with the above and states that where necessary, applicants will be expected to carry out noise assessments and provide details of noise levels on the Site.

### Existing Noise Conditions and Survey Methodology

- 06.18.5** An unattended environmental sound survey was carried out by Stantec between 1–7 June 2023 at three locations around the Lots Road site. The survey measured LAeq, LA90, and LAFMax levels at two-minute intervals. Microphones were positioned to represent free-field conditions and were calibrated before and after deployment. The survey revealed daytime LAeq values ranging from 50 to 63 dB and night-time levels from 44 to 61 dB across different locations. Dominant noise sources included road traffic on Lots Road and train movements on the adjacent railway. A concurrent environmental vibration survey assessed vibration levels arising from the railway line using appropriate instrumentation placed on the west site boundary.

### Proposed Noise Mitigation

- 06.18.6** To achieve acceptable internal noise levels (as per BS 8233:2014 and ProPG guidance), the development will incorporate enhanced building fabric, including high-performance glazing and mechanical ventilation systems. Where windows are closed, internal LAeq targets of 35 dB (day) and 30 dB (night) will be met. Ventilation strategies are designed to avoid overheating while also controlling noise ingress. Specifications for façade elements, including glazing and ventilation, are detailed in Appendix E of LR23 Noise and Vibration Impact Assessment. Where required, dynamic thermal modelling will be used to comply with Building Regulations

Approved Document O for overheating, accounting for high external noise levels. We expect a noise compliance condition to be included in the decision notice.

#### Response to the Agent of Change Principle

- 06.18.7** In line with the Agent of Change principle set out in the London Plan and local policies, the proposed development takes responsibility for mitigating impacts from existing environmental noise sources. This includes designing the building envelope and internal layouts to insulate against railway and road noise, ensuring existing noise-generating uses, primarily the adjacent West London railway line, are not subject to restrictions due to the development. Acoustic mitigation measures are integrated early in the design process and follow good acoustic design principles to preserve amenity and ensure the viability of surrounding uses.

#### Vibration Impacts and Mitigations

- 06.18.8** The vibration survey identified low to moderate levels of vibration from passing trains. Calculated Vibration Dose Values (VDV) were below the Significant Observed Adverse Effect Level (SOAEL), indicating a low probability of adverse comment. Mitigation is not considered necessary, but the report outlines best-practice construction techniques and recommends further assessments during detailed design. For re-radiated noise, predicted levels were also below the 35 dB LA<sub>max,s</sub> threshold, which is the Lowest Observed Adverse Effect Level (LOAEL), confirming acceptability without need for additional structural isolation.

#### Supporting Information

- 06.18.9** Please see the following documents submitted in support of this planning application for further details:
- / LR23 Noise and Vibration Impact Assessment (Stantec)

## 06.19 AIR QUALITY

### Planning Policy

- 06.19.1** London Plan Policy SI1 states that major development should be net zero-carbon with a minimum on-site reduction of at least 35% beyond Building Regulations for major development. Where it can be demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided either through a cash in lieu contribution to the borough's carbon offset fund, or provided off-site where an alternative proposal is identified, and delivery is certain.
- 06.19.2** RBKC Policy GB6 (Air Quality) requires all development to meet the air quality neutral benchmarks in accordance with the London Plan. All major developments are also required to undertake and submit an Air Quality Assessment.
- 06.19.3** RBKC Policy GB9 (Odour) states that odour generating development must address the adverse impact of odour through incorporation of appropriate mitigation measures.
- 06.19.4** LBHF Policy CC10 (Air Quality) seeks to reduce the potential adverse air quality impacts of new developments. This includes by requiring mitigation measures to be implemented to reduce emissions.

### Existing Conditions

- 06.19.5** The Lots Road development site is located within an area of heightened air quality concern, including the Air Quality Management Areas (AQMAs) designated by both the Royal Borough of Kensington and Chelsea (RBKC) and the London Borough of Hammersmith and Fulham (LBHF), as well as within a Greater London Authority (GLA) Air Quality Focus Area.
- 06.19.6** Monitoring data for nitrogen dioxide (NO<sub>2</sub>) show that while exceedances of the annual mean objective (40 µg/m<sup>3</sup>) occurred at nearby roadside sites in 2017 and 2018, concentrations have declined steadily and were well below objectives at all sites by 2022/2023. The nearby Earl's Court monitoring station reports PM<sub>10</sub> concentrations well below objective levels and no exceedances of short-term limits since 2017. Estimated background levels and LAEI modelled concentrations for 2025 and 2030 at the Site show pollutant levels (NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>) comfortably within statutory thresholds and below GLA targets by 2030. No significant industrial or rail-related emission sources were identified that would compromise local air quality.

### Mitigation Measures

- 06.19.7** Construction-phase impacts will be mitigated through a Dust Management Plan employing best practice measures consistent with IAQM and GLA guidance. Demolition activities, earthworks, and construction processes were assessed to pose a medium to high risk of dust generation without mitigation, but with the recommended controls in place (including dust suppression, site runoff control, and NRMM emissions compliance), effects are predicted to be 'not significant'. Construction traffic emissions are expected to fall below screening thresholds and do not warrant further assessment. These measures will be conditioned.

**06.19.8** Operationally, the development is based on an all-electric energy strategy, avoiding emissions from combustion plant. The only source of emissions will be an emergency diesel generator limited to infrequent testing, which will be restricted by condition. The air quality impact from traffic associated with the completed development has been screened and found to fall below the thresholds requiring detailed assessment. These mitigation measures will be conditioned.

**06.19.9** The development is shown to be “air quality neutral” in accordance with the London Plan. The siting and layout, including the location of ventilation intakes and receptor exposure, have been designed to minimise pollutant exposure. As such, the scheme aligns with both RBKC and LBHF policy requirements, GLA guidance, and broader national regulations, and is considered compliant with current air quality objectives and mitigation standards.

Supporting Information

**06.19.10** Please see the following documents submitted in support of this planning application for further details:

- / LR22 Air Quality Assessment (AQC)
- / LR24 Commercial Property Ventilation and extraction details

## 06.20 WASTE AND SERVICING

### Planning Policy

- 06.20.1** London Plan Policy T7 (Deliveries, servicing and construction) requires development proposals to facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 06.20.2** RBKC Policy GB7 (Construction Management) states that relevant developments must not create unacceptable impact on local residential amenity including neighbouring properties as a result of demolition and construction impacts by complying with the Code.
- 06.20.3** RBKC Policy GB17 (Waste Management) states that new development is required to provide innovative internal and external well designed, functional and accessible waste and recycling (including food) storage space which allows for ease of collection in all developments.
- 06.20.4** RBKC Policy TR6 (Active Travel) promotes walking and cycle in new developments, provision of accessible and secure parking facilities and safeguarding of existing footways and footpaths used by the public, or land over which the public have a right of way.
- 06.20.5** RBKC Policy TR7 (Public Transport) promotes sustainable travel through the delivery of enhancements to existing public transport infrastructure.
- 06.20.6** RBKC Policy TR9 (Servicing) requires developments to provide sufficient on-site servicing space where feasible. Proposals for larger developments, must be supported by a Delivery Management Plan to explain how deliveries would be consolidated (through use of a concierge or mail office) to limit van traffic generation.
- 06.20.7** Under LBHF Policy CC6 (Strategic Waste Management) the Council will pursue sustainable waste management including seeking, where possible, the movement of waste and recyclable materials by sustainable means of transport.
- 06.20.8** LBHF Policy CC7 (On-site Waste Management) requires all new developments to include suitable facilities for the management of waste generated by the development, including the collection and storage of separated waste and where feasible on-site energy recovery.
- 06.20.9** LBHF Policy T7 (Construction and Demolition Logistics) requires all construction, demolition, utilities and major logistic activities within the borough to work with the Council in developing the scope and impact of their operations.

### Access

- 06.20.10** The access strategy focuses on maximising permeability and prioritising sustainable and inclusive movement. The scheme proposes multiple pedestrian access points along all site edges, including Lots Road, Chelsea Creek, and the new Creekside Promenade. Key public entrances are clearly marked and activated by

commercial uses, enhancing legibility and wayfinding. A shared surface route runs along the southern, northern and western edges, facilitating level access across the Site and linking new public spaces. Entrances to residential cores and non-residential facilities are located to ensure convenient access from surrounding streets, with generous footpaths and inclusive design features supporting ease of movement for all users, including those with limited mobility.

**06.20.11** Vehicular access is restricted to six blue badge spaces, certain delivery and servicing trips, refuse collection, pick up and drop off for the Extra Care block, and emergency access, reinforcing the car-free nature of the development. The controlled access minimises conflicts between vehicles and pedestrians, while maintaining operational functionality. Emergency vehicle access is integrated into the shared surface areas, complying with relevant standards.

#### Delivery and Servicing

**06.20.12** The Delivery and Servicing Plan ('DSP') establishes a clear and comprehensive strategy for managing delivery, servicing, and refuse movements associated with the proposed mixed-use scheme. The DSP sets out to minimise disruption, reduce loading activity on Lots Road, and ensure the safe and efficient operation of delivery and servicing activities across the Site.

**06.20.13** The proposed strategy adopts a one-way internal route accessed from the northern Lots Road access, circulating around the Site to a central internal loading bay. This bay will serve key uses within Block A, including the Community Centre, Extra Care accommodation, and commercial space, all of which are expected to generate regular servicing needs. A secondary, reduced loading provision is retained along Lots Road reduced to 32m across two sections to accommodate shorter dwell times for fronting commercial units. The strategy is supported by refuse collection arrangements that utilise the internal road network where possible, with bin store locations designed to be within 20 metres of collection points, in line with operational best practice.

**06.20.14** Operational control is embedded through the establishment of a Facilities Management Team, which will oversee the implementation of the DSP, coordinate collections, enforce access restrictions, and maintain compliance. This includes the use of a booking system for commercial deliveries and dedicated facilities for unattended deliveries to residential units. Refuse collection will be split between RBKC and LBHF in line with the Site's geography, with both councils servicing their respective areas via the internal route or, in one case, directly from Lots Road.

**06.20.15** The strategy demonstrably reduces pressure on the public highway by transferring the majority of delivery activity into the Site, limiting the footprint of on-street loading, and reducing dwell times compared to the previous auction house use. Although the quantum of delivery trips is expected to increase post-development, the strategy mitigates impacts through internalisation, vehicle management, and efficient scheduling.

**06.20.16** This strategy is acceptable as it aligns with London Plan objectives, TfL guidance on DSPs, and principles of sustainable urban freight management. It improves the public realm, enhances operational safety, reduces

emissions through the promotion of low-emission vehicles, and provides a flexible framework capable of evolving through detailed DSPs secured by condition.

#### Waste Management

- 06.20.17** The accompanying Waste Management Statement provides a detailed overview of the operational waste management for household waste, bulky waste, residential collections, commercial waste and reduction, reuse and recycling initiatives.
- 06.20.18** Commercial tenants will be responsible for arranging waste collections through registered waste contractors, ensuring compliance with the Waste Hierarchy.
- 06.20.19** Construction Waste is addressed within Appendix A of the Outline Site Waste Management Plan and considers waste during the construction, demolition and excavation phases. This will then be taken forward by the Principal Contractor, once appointed, with the plan to become more detailed as the development progresses.
- 06.20.20** A full construction environmental management plan will be conditioned.

#### Supporting Information

- 06.20.21** Please see the following documents submitted in support of this planning application for further details:
  - / LR26 Transport Assessment (Stantec)
  - / LR28 Draft Delivery and Servicing Strategy (Stantec)
  - / LR29 Waste Management Statement (Stantec)

## 06.21 PARKING

### Planning Policy

- 06.21.1** London Plan Policy T5 (Cycling) states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This can be achieved through securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards outlined within the London Plan.
- 06.21.2** London Plan Policy T6 (Car parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. It goes on to say that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').
- 06.21.3** London Plan Policy T6.1 (Residential parking) sets maximum parking standards for new residential development and states that parking spaces within communal car parking facilities should be leased rather than sold. Table 10.3 sets out the maximum residential parking standards. Disabled parking requirements for new residential developments (of >10 units) as a minimum should ensure that 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset.
- 06.21.4** London Plan Policy T6 outlines the relevant parking rates for the non-residential uses proposed within the development.
- 06.21.5** At a local level, RBKC Policy TR8 and LBHF Policy T4 outline the vehicle parking standards.
- 06.21.6** LBHF Policy T5 (Parking for Blue Badge Holders) new developments that include vehicular access must provide accessible, off street car parking bay for Blue Badge holders even if no other general parking is provided as part of the development.

### Cycle Parking

- 06.21.7** The cycle parking strategy proposes 382 long-stay cycle spaces in secured stores for residential and 19 long stay cycle places in the commercial units. This policy requirements for each use is 381 and 19 respectively, meaning the proposed long stay provision is policy compliant.
- 06.21.8** 22 short-stay cycle parking spaces have been agreed with the LPA's to be provided in the landscape. The policy requirement for short stay provision is 11 for the residential element and 64 for the non-residential element, however this level of provision has been agreed with the LPA's despite falling short of policy in order to avoid cluttering the landscape.
- 06.21.9** Long-stay cycle parking will be secure, sheltered, and accessible, including provision for larger cycles and inclusive design in line with LCDS recommendations that at least 5% accommodate non-standard cycles.

Commercial/ancillary/Other	Block A		Block B		Block C		Block D		Block E		Total Long-Stay	Total Short-Stay
	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay		
	Café (A2-A5)	0.7	6.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
Flex Commercial (A1 food)	0.5	4.1	0.0	0.0	0.0	0.0	2.8	24.3	1.6	14.3	4.9	42.6
Community Centre (D1 - other)	0.0	0.0	1.0	2.5	0.0	0.0	0.0	0.0	0.0	0.0	1.0	2.5
SEIS (B1 Light Ind/R&D)	0.0	0.0	8.5	1.3	0.0	0.0	0.0	0.0	0.0	0.0	8.5	1.3
Flex Commercial (A1 non-food)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>1.2</b>	<b>10.6</b>	<b>9.5</b>	<b>3.8</b>	<b>0.0</b>	<b>0.0</b>	<b>2.8</b>	<b>24.3</b>	<b>1.6</b>	<b>14.3</b>	<b>15.1</b>	<b>52.9</b>

	Block A		Block B		Block C		Block D		Block E		Total Long-Stay	Total Short-Stay
	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay		
Residential	186.00	3.70	6.50	1.63	101.50	2.33	62.00	2.00	24.00	2.00	380	12
Commercial	1.21	10.63	9.47	3.75	0.00	0.00	2.77	24.28	1.63	14.25	15	53
<b>Total</b>	<b>187</b>	<b>14</b>	<b>16</b>	<b>5</b>	<b>102</b>	<b>2</b>	<b>65</b>	<b>26</b>	<b>26</b>	<b>16</b>	<b>395</b>	<b>65</b>

**06.21.10** Cycle parking will be distributed across different land uses on-site. All parking areas are designed to be well-located and convenient to encourage active travel.

**06.21.11** The strategy complies with London Plan Policy T5, which requires appropriate levels of secure, accessible, and well-located cycle parking. It also meets RBKC Local Plan policies that support sustainable travel and reduce car dependency. The provision supports the Mayor’s target of 80% of trips made by foot, cycle, or public transport by 2041 and integrates with the broader active travel improvements proposed as part of the scheme, including enhanced public realm and walking routes.

#### Car Parking

**06.21.12** The Application Scheme will be car-free, with the exception of six on-site blue badge parking spaces on site, with provision to provide two more on-street if required. No general residential car parking will be provided, and future residents will be restricted from applying for on-street parking permits. This approach is supported by the Site’s good access to public transport (PTAL 4) and the anticipated demographic of residents.

**06.21.13** This car parking strategy is fully compliant with the London Plan Policy T6.1, which promotes car-free development in areas with good public transport accessibility. It also meets the minimum requirement to provide one accessible bay per 3% of dwellings from the outset.

**06.21.14** This application is also accompanied by a Parking Management Plan prepared by Stantec. The Plan sets out how the proposed site-wide car and cycle parking provision associated with the development shall be managed, operated and enforced to ensure effective operation, avoid undue parking stress and encourage sustainable modes of transport.

#### Supporting Information

**06.21.15** Please see the following documents submitted in support of this planning application for further details:

- / LR26 Transport Assessment (Stantec) and Parking Management Plan (Stantec)

## 06.22 HIGHWAYS

### Planning Policy

- 06.22.1** London Plan Policy T2 (Healthy Streets) states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Developments should reduce the dominance of vehicles on London streets whether stationary or moving.
- 06.22.2** London Plan Policy T3 (Transport capacity, connectivity and safeguarding) requires development proposals to support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
- 06.22.3** London Plan Policy T4 (Assessing and mitigating transport impacts) requires transport assessments to be submitted which ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 06.22.4** RBKC Policy TR1 (Street Network) requires any new street networks to be inspired by the borough's historic street patterns and establish a clear function, hierarchy and choice of routes designed to optimise connectivity, accessibility and legibility.
- 06.22.5** RBKC Policy TR3 (Living Streets and Outdoor Life) require opportunities to be taken within the street environment to create places that support outdoor life, are inclusive to all, and add to their attractiveness and vitality.
- 06.22.6** RBKC Policy TR4 (Streetscape) requires improvements to the visual, functional and inclusive quality of our streets, ensuring they are designed and maintained to a very high standard, that street clutter is removed and that street furniture, advertisements and signs are carefully controlled to avoid clutter to support the Council's aim of driving up the quality of the borough's streetscape.
- 06.22.7** RBKC Policy TR5 (Land Use and Transport) requires a development to be located in suitable areas where the transport requirements can be met in a sustainable manner, and which actively encourages travel by sustainable modes. Large scale developments are required to submit Transport Assessments and Travel Plans.
- 06.22.8** LBHF Policy T1 (Transport) seeks to improve transportation provision, accessibility, and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail.
- 06.22.9** LBHF Policy T6 (Borough Road Networks – Hierarchy of Road) requires developments, construction and other operations that affect the borough's road network will be regulated according to the council's hierarchy of roads.

### Trip Generation

- 06.22.10** The overall person trip rates for the Development have been obtained from the Trip Rate Information Computer System ('TRICS') database version 7.10.2 and trip surveys at the existing site. Owing to the reduced car parking provisioning on the Development, there is a slight reduction in car trips associated with the Site. People associated with the proposed Development will overwhelmingly use active transport and public transport modes.
- 06.22.11** The delivery and servicing trip generation is expected to result in a decrease of 39 two-way trips on a daily basis. However, as noted in the trip distribution section, overall parking demand for servicing and loading is expected to drop significantly.

A dwell time analysis exercise was performed, distributing the proposed vehicle trip generation between on-site servicing/loading and that on Lots Road. It is found that the Development is to anticipate a combined 6:49:07 dwell time on-Site and 13:00:59 on Lots Road. This is compared to the existing Site with over 37 hours of activity.

### Travel Plan

- 06.22.12** The LR27 Outline Travel Plan sets out a comprehensive strategy to promote sustainable and active travel among future residents and visitors. The plan includes appointing a Travel Plan Coordinator which will be secured via S106 responsible for implementing, monitoring, and promoting the plan's objectives. It outlines a suite of initiatives such as Travel Information Packs, travel awareness campaigns, and integration of walking, cycling, and public transport facilities. Specific provisions include cycle parking, electric vehicle charging points, and promotion of car clubs and eco-driving. The development itself is car-free except for six accessible bays on-site, with strong public transport links and nearby amenities to reduce car dependency.
- 06.22.13** The travel impact of the proposed scheme is acceptable due to its proactive approach to managing transport demand and promoting modal shift. The strategy ensures future residents are well-supported in adopting sustainable habits through infrastructure, communication, and behavioural tools. The Site's location, coupled with planned pedestrian and cycle permeability, access to transit, and a managed travel plan framework, substantially mitigates reliance on private cars. These measures align with national and local sustainability priorities and demonstrate a clear commitment to reducing transport-related environmental impacts.

### Construction Management

- 06.22.14** The LR30 Demolition and Construction Management and Logistics Plan details a phased construction programme, including site setup, demolition, substructure works, superstructure erection, and fit-out, extending over approximately 3.5 years. It specifies construction methodologies and plant usage, and it sets out designated vehicle routing using the strategic road network to minimise disruption. The plan commits to a range of measures aligned with Transport for London best practice, including safe vehicle standards, delivery scheduling, out-of-peak operations, and reuse of materials on-site.

**06.22.15** Impacts of the development are assessed as acceptable due to embedded mitigation strategies that reduce congestion, improve safety, and lower emissions. These include the use of a Construction Logistics Manager (to be conditioned), strict adherence to delivery routes, and coordination with nearby sites to avoid cumulative disruption. Sustainable practices such as prefabrication and proximity sourcing are considered to limit vehicle trips. The plan ensures monitoring and ongoing refinement through a detailed CLP to be secured by condition, demonstrating that highway and environmental impacts during construction will be negligible with appropriate management.

Supporting Information

**06.22.16** Please see the following documents submitted in support of this planning application for further details:

- / LR26 Transport Assessment (Stantec)
- / LR27 Outline Travel Plan (Stantec)
- / LR28 Outline Delivery and Servicing Strategy (Stantec)
- / LR30 Demolition and Construction Management and Logistics Plan (Stantec)

## 06.23 ENERGY

### Planning Policy

**06.23.1** London Plan Policy SI2 (Minimising greenhouse gas emissions) states that major development should be net zero-carbon, with a minimum on-site reduction of at least 35% beyond Building Regulations. Where it can be clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, Policy SI2 allows any shortfall to be provided through a cash in lieu contribution to the borough's carbon offset fund.

**06.23.2** London Plan Policy SI3 (Energy infrastructure) requires boroughs and developers to engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals.

### Application Scheme

**06.23.3** The proposed energy strategy is compliant with Building Regulations Part L (2021) and structured around the GLA's "Be Lean, Be Clean, Be Green, Be Seen" energy hierarchy. It is expected that Be Seen obligations will be secured through the s106 agreement. It demonstrates an 81% reduction in regulated carbon emissions through passive design, electric air source heat pumps (ASHPs), and photovoltaic (PV) panels. The remaining emissions are addressed via a carbon offset payment, satisfying the requirement for zero-carbon development as defined in Policy SI 2 of the London Plan.

**06.23.4** Policy compliance is clearly demonstrated throughout. At the "Be Lean" stage, energy efficiency and fabric-first measures yield a 14% CO<sub>2</sub> reduction, surpassing the 10% GLA minimum for residential schemes. The "Be Clean" assessment concludes that no viable district heating network is available; however, infrastructure for a future connection is included, in line with best practice and RBKC policy. The "Be Green" phase deploys a fully electric solution using ASHPs and maximised rooftop PVs, achieving a further CO<sub>2</sub> saving. The proposal aligns with the London Plan requirement for a 35% on-site CO<sub>2</sub> reduction and RBKC's target of 100% onsite reduction for affordable homes. A carbon offset payment of £137,270 addresses residual emissions, to be secured via S106 agreement. Non-residential elements are modelled to meet Part L 2021 using Dynamic Simulation Modelling and will meet BREEAM 'Excellent' standards. The strategy also includes post-occupancy monitoring in line with the "Be Seen" requirement. Overall, the development is policy compliant, future-proofed for grid decarbonisation, and demonstrates best practice in energy design and carbon reduction.

**06.23.5** Supporting Information

**06.23.6** Please see the following documents submitted in support of this planning application for further details:

/ LR17 Energy Strategy (IN2)

## 06.24 SUSTAINABILITY

### Planning Policy

- 06.24.1** London Plan Policy SI7 (Reducing waste and supporting the circular economy) outlines the requirements to promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. The adoption of circular economy principles means creating a built environment where buildings are designed for adaptation, reconstruction and deconstruction. This intends to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling.
- 06.24.2** London Plan Policy SI8 (Waste capacity and net waste self-sufficiency) requires how waste will be reduced to be identified.
- 06.24.3** RBKC Policy GB1 (Sustainable Retrofitting) states that Sensitive, sustainable and safe retrofitting of all our existing building stock is supported. For large retrofit schemes, third-party voluntary standards that enable certificate of compliance should be used.
- 06.24.4** RBKC Policy GB2 (Circular Economy) requires major development to follow circular economy principles and aim to be net zero-waste. A circular economy statement meeting the requirements of the London Plan must be submitted.
- 06.24.5** RBKC Policy GB3 (Whole Life-cycle Carbon) requires applicants for major development proposals to calculate whole life-cycle carbon emissions and demonstrate actions taken to reduce whole life-cycle carbon emissions through submission of a whole life-cycle carbon assessment.
- 06.24.6** RBKC Policy GB4 (Energy and Net Zero Carbon) requires developments to optimise building design to reduce energy demand in-line with the London Plan energy hierarchy. Major development must be zero net carbon in operation and demonstrate that opportunities for on-site renewable energy generation have been maximised. Major non-residential development must demonstrate that it meets BREAAAM “excellent” standard.
- 06.24.7** LBHF Policy CC1 (Reducing Carbon Dioxide Emissions) requires all major developments to implement energy conservation measures including implementing the London Plan sustainable energy policies.
- 06.24.8** LBHF Policy CC2 (Ensuring Sustainable Design and Construction) requires the implementation of sustainable design and construction methods.

### Sustainability Measures

- 06.24.9** The development adopts a comprehensive sustainability strategy focused on energy reduction, circular economy principles, biodiversity enhancement, and climate resilience.

- 06.24.10** Water efficiency measures comply with Part G of Building Regulations, with a consumption target of 105–110 l/p/d. Flood risk is managed through sustainable drainage systems (SuDS), including green roofs, permeable paving, and rain gardens.
- 06.24.11** Site waste management follows best practice for construction and operational phases, ensuring adequate segregation and minimisation of landfill use. Transport impacts are reduced via a car-free scheme (except for blue badge bays), extensive cycle storage, and EV charging facilities, in accordance with the NPPF and local transport policies.
- 06.24.12** The scheme achieves a 0.4 Urban Greening Factor, enhances biodiversity, and avoids any net loss of ecological value, addressing London Plan and RBKC/ LBHF green infrastructure goals. An all-electric heat system eliminates on-site fossil fuel combustion, resulting in air quality neutral performance and compliance with GLA NOx emission benchmarks. Non-residential areas are targeting BREEAM ‘Excellent’ ratings, demonstrating adherence to best-practice sustainable construction standards.
- 06.24.13** Overall, the proposals deliver a well-integrated, policy-compliant sustainability strategy that mitigates environmental impact, supports zero-carbon objectives, and aligns with local and regional planning guidance.

#### Circular Economy

- 06.24.14** The proposals have been developed in accordance with the six circular economy principles defined in GLA guidance: building in layers, designing out waste, designing for longevity, designing for adaptability and flexibility, designing for disassembly, and using reusable and recyclable materials. The strategy includes a detailed Circular Economy Decision Tree analysis and a pre-demolition audit that demonstrates the technical and environmental justifications for the full redevelopment. Retention of existing structures was found unfeasible due to space constraints, structural limitations, and future adaptability concerns. However, key materials such as concrete, metals, glazing, and timber are targeted for reuse or recycling, with an overall demolition waste diversion target of 95%.
- 06.24.15** The statement sets measurable targets for circular performance: 95% diversion from landfill for demolition, excavation, and construction waste; 50% diversion for municipal waste (increasing to 65% by 2030); and a minimum of 20% of materials by value to be from recycled or reused content. These align with GLA and BREEAM expectations. Implementation is supported by a sustainable procurement plan, operational waste strategy, and commitments to using Environmental Product Declaration (EPD) certified products. Flexibility in design, modular systems, and disassembly planning are also embedded to support whole-life carbon reductions. End-of-life strategies include recoverable façades, recyclable services, and durable material specifications. Compliance with policy is demonstrated throughout the report via systematic integration of GLA guidance, London Plan policy SI 7, and relevant best practice methodologies.

#### Whole Life Carbon

- 06.24.16** The LR20 Whole Life Carbon Assessment covers life cycle stages The proposed development is estimated to have a total GWP of 40,592,006 kgCO<sub>2</sub>eq (excl. B6-B7), resulting in a carbon intensity of 884 kgCO<sub>2</sub>eq/m<sup>2</sup>,

across its entire life cycle (A1-A5, B4, B6, and C1-C4). Majority of the carbon emissions result from modules A1-A3 (24,971,367 kgCO<sub>2</sub>eq).

Supporting Information

**06.24.17** Please see the following documents submitted in support of this planning application for further details:

- / LR18 Sustainability Statement (IN2)
- / LR19 Circular Economy Statement (IN2)
- / LR20 Whole Life Carbon Assessment (IN2)

## 06.25 FLOODING

### Planning Policy

- 06.25.1** London Plan Policy (SI 12 Flood risk management) requires development proposals to minimize and mitigate flood risk, address residual risk, and, where possible, create space for water by setting developments back from watercourses. Proposals should support the Thames Estuary 2100 Plan, ensure utility services remain operational under flood conditions and design buildings for quick recovery post-flood. Additionally, proposals near flood defences must protect and provide access for maintenance and upgrades, and incorporate natural flood management methods to enhance flood storage, recreational areas, and habitats.
- 06.25.2** RBKC Policy GB11 (Flood Risk) aims to ensure that development within the borough is appropriately located and designed in relation to flood risk. It requires that proposals demonstrate no increased risk of flooding elsewhere, reduce surface water runoff where possible, and incorporate flood resilience and mitigation measures suitable to the Site. Development should be informed by a site-specific flood risk assessment where necessary and should align with the borough's Strategic Flood Risk Assessment and Surface Water Management Plan.
- 06.25.3** The supporting text of Policy SA6 (Lots Road South) states that:
- / The Site lies within Flood Zones 2 and 3. An Exception Constraints test and a Flood Risk Assessment should be submitted to support any future planning application. The assessments should take into account the new climate change allowances and requirements, especially for surface water flooding. New development needs to address surface water to reduce the peak flow into the combined sewer network such that surface water discharge into the network is restricted to be in line with the requirements of Policy GB12.*
  - / The submitted Flood Risk Assessment will also need to demonstrate that any tidal flood defences along the Chelsea Creek can be raised in line with the TE2100 plan as required by Policy GB11 of this Local Plan and Policy SI 12 of the London Plan, and that the design life of the flood defence is commensurate to the lifetime of the development. A 16-metre buffer should be provided from the outer edge of these flood defences (including any buried elements such as any tie rods or anchor blocks).*

- 06.25.4** LBHF Policy CC3 (Minimising Flood Risk and Reducing Water Use) seeks to ensure that new development in the borough reduces flood risk and promotes water efficiency. Developments in flood risk areas must demonstrate safety for users without increasing flood risk elsewhere, incorporating flood resistance and resilience measures.

### Flood Risk

- 06.25.5** The application site spans multiple flood zones. The western portion is in Flood Zone 1 (low probability of flooding), while parts of the eastern side fall within Flood Zone 2 (medium probability), and a small area in the south lies in Flood Zone 3 (high probability). The principal flood risks are from the tidal River Thames and

Chelsea Creek, with minor surface water flooding risks identified in the north-eastern quadrant. The Site is currently protected by existing flood defences designed to withstand a 1 in 1000-year tidal event

**06.25.6** The proposed enhancement of the Chelsea Creek flood defence wall will raise the crest level to 6.4m AOD, meeting TE2100 2100-level requirements, with a design life of 100–120 years. A sequential approach has been taken in order to minimise future flood risk by locating the majority of development in areas of lowest flood risk, with all built development set outside of Flood Zone 3. Finished floor levels are set above extreme modelled flood levels, and safe access and egress is maintained under all breach scenarios. Residual risk is mitigated through a combination of resilient design measures and emergency planning, in accordance with the London Plan's requirement for buildings to be designed for quick recovery post-flood.

**06.25.7** The LR31 Flood Risk and SUDS Assessment confirms that the development will be safe throughout its lifetime without increasing flood risk elsewhere, and that resilience and mitigation measures have been incorporated to ensure that buildings can withstand and recover from extreme flood events. The SuDS and compliance with the flood risk management plan will be conditioned.

#### Exception Test

**06.25.8** In accordance with Policy SA6 of the RBKC Local Plan the application is required to provide a flood risk exception test to accompany the submitted LR31 Flood Risk and SUDS Assessment. It can be demonstrated that both elements of the Exception Test are satisfied.

##### *1. Wider Sustainability Benefits (Part 1 of the Exception Test)*

**06.25.9** The redevelopment of Lots Road South will deliver significant sustainability benefits to the local community. It comprises a high-density, mixed-use scheme providing much-needed new homes including affordable extra care and general needs housing in an accessible, well-connected urban location. The scheme also delivers community facilities, flexible commercial uses including affordable commercial space, education and cultural space, and enhancements to the public realm and biodiversity through intertidal landscaping along Chelsea Creek. These elements support inclusive regeneration of a long under-utilised site, in line with RBKC's Local Plan vision and spatial strategy. The Site allocation SA6 confirms the strategic importance of the Site in meeting housing and placemaking objectives, and no reasonably available alternative sites at lower flood risk have been identified when the Site was allocated by RBKC, satisfying the Sequential Test.

##### *2. Safe and Sustainable Development (Part 2 of the Exception Test):*

**06.25.10** The accompanying FRA demonstrates that the development will be safe for its lifetime, without increasing flood risk elsewhere, and includes measures to manage and mitigate residual risk:

- / Built development is focused in areas of lowest flood risk (Flood Zone 1), with only minor areas in Zones 2 and 3.
- / Finished floor levels will be set at 6.5m AOD150mm above the 2100 design tidal flood level of 6.35m AODensuring resilience to future climate change.

- / The existing flood defences along Chelsea Creek will be improved and raised to 6.4m AOD in line with the Thames Estuary 2100 (TE2100) Plan. A 16-metre buffer from the outer edge of the flood defences, including buried elements, has been secured to safeguard future upgrades and maintenance.
- / Surface water discharge will be unrestricted into Chelsea Creek, with runoff managed on site using a comprehensive Sustainable Drainage Strategy including green roofs, permeable paving, tree pits, rain gardens, and an attenuation tank. These measures accommodate a 1 in 100 year storm event with a 40% climate change allowance, and are consistent with RBKC Policy GB12 and national drainage hierarchy principles.
- / The Site is not within a Critical Drainage Area, and risk from surface water, groundwater, sewers, and infrastructure failure is low.
- / Safe pedestrian and vehicular access and egress is maintained during extreme flood events.

**06.25.11** The Application Scheme therefore demonstrable sustainability benefits and integrates robust flood risk mitigation measures that ensure the scheme is safe and does not exacerbate flood risk. The requirements of the Exception Test set out in national guidance and RBKC Policy SA6 are fully met.

#### Development Setback

**06.25.12** In response to the Thames Estuary 2100 Plan and RBKC Policy GB11 (Flood Risk) requirements for a 16m setback for new development from Thames flood defences, the Applicant has consulted with the Environment Agency and drainage officers from both RBKC and LBHF. The Environment Agencies 21st May 2025 written feedback confirmed that it is possible that a setback of less than 16m could be accepted at the Site:

*'If the full 16m cannot be delivered, we would expect to see further justification as to why this is the case, and expect provision of as much set back as possible. For any set back less than 16m we would expect to see evidence that it would not harm the flood defences, that access can still be provided for maintenance and repair and that flood risk will not be increased elsewhere'.*

- 06.25.13** The proposals incorporate a setback zone of 6.3 metres, with pedestrian access, landscaping, space for maintenance and intertidal terracing. These measures, alongside detailed technical assessments, ensure the creek works support the wider objectives for flood protection, biodiversity, access, and long-term resilience.
- 06.25.14** Comprehensive details of all landscaping elements, including tree planting, street furniture, and any other fixed objects, have been provided to demonstrate that these features will not impede access. Please see the landscape section of the planning statement and LR12 Landscape Statement for full details of the landscaping strategy and how this relates to Chelsea Creek.

## Supporting Information

**06.25.15** Please see the following documents submitted in support of this planning application for further details:

- / LR12 Landscape Statement (BDP)
- / LR26 Transport Assessment (Stantec)
- / LR31 Flood Risk and SUDS Assessment (Stantec)

## 06.26 DRAINAGE

### Planning Policy

- 06.26.1** London Plan Policy (SI 13 Sustainable drainage) requires that developments aim to achieve greenfield run-off rates and manage surface water run-off as close to its source as possible. This should be done following the drainage hierarchy that prioritizes the use of green infrastructure (e.g., rainwater harvesting, green roofs, and rain gardens) over grey infrastructure (e.g., conventional drainage systems). Proposals should also resist impermeable surfaces unless unavoidable and design drainage to promote multiple benefits such as improved water quality, increased biodiversity, and enhanced urban greening.
- 06.26.2** RBKC Policy GB11 (Flood Risk) places particular emphasis on sustainable drainage systems (SuDS), the use of permeable materials, and the preservation of existing flood pathways and storage areas.
- 06.26.3** RBKC Policy GB12 (Sustainable Drainage) requires developments to incorporate sustainable drainage systems (SuDS) that manage surface water runoff as close to its source as possible, reducing flood risk and improving water quality. Proposals must follow the drainage hierarchy, prioritizing infiltration and above-ground solutions. SuDS should be designed to deliver multiple benefits, including biodiversity and amenity value, and be maintained effectively over the long term. Applicants must provide a drainage strategy demonstrating compliance.
- 06.26.4** LBHF Policy CC3 (Minimising Flood Risk and Reducing Water Use) requires proposals to follow the drainage hierarchy and incorporate Sustainable Drainage Systems (SuDS) where feasible, prioritising green over grey infrastructure.
- 06.26.5** LBHF Policy CC4 (Minimising Surface Water Run-Off with Sustainable Drainage Systems) requires all development proposals to manage surface water run-off through the use of Sustainable Drainage Systems (SuDS) to reduce flood risk and protect water quality. Developments must achieve greenfield run-off rates and volumes where feasible, and incorporate a SuDS strategy as part of their design. The policy prioritises above-ground and natural drainage solutions, including permeable surfaces, green roofs, swales, and rain gardens. Applicants must demonstrate that SuDS are integrated into the scheme and maintained for the lifetime of the development. Proposals in Critical Drainage Areas or Flood Zones 2 and 3 must provide site-specific flood risk assessments and detailed drainage strategies .
- 06.26.6** LBHF Policy CC5 (Water Quality) seeks to protect and improve the quality of water bodies in the borough, supporting the objectives of the Thames River Basin Management Plan and the Water Framework Directive. The policy requires development to demonstrate that it will not harm the quality of surface or groundwater and promotes the use of sustainable drainage systems (SuDS) to manage runoff. It also encourages remediation of contaminated land, minimisation of pollution risk, and maintenance or enhancement of water quality, particularly in areas near watercourses or within groundwater source protection zones .

### Application Scheme

- 06.26.7** The proposed drainage strategy for the Application Scheme prioritises the use of Sustainable Drainage Systems (SuDS) in line with policy. The surface water management approach is based on discharging runoff into the adjacent tidal Chelsea Creek, which is feasible due to the Site's proximity and the creek's tidal nature. The discharge is proposed to be unrestricted, justified by the receiving waterbody's tidal characteristics. Infiltration is not viable due to the underlying impermeable London Clay Formation. SuDS elements proposed include green roofs, permeable and porous paving, tree pits, and rain gardens. A below-ground attenuation tank is also incorporated to provide temporary storage during high tide conditions when outfalls may be submerged.
- 06.26.8** The design follows the drainage hierarchy, aiming to manage runoff close to its source while achieving greenfield runoff rates where feasible. While full infiltration is not possible, SuDS features are integrated throughout the Site to reduce runoff volumes and provide water quality treatment. The system is designed to accommodate rainfall events up to the 1 in 100-year storm with a 40% climate change allowance, avoiding above-ground surcharging during such events and providing exceedance routes for exceptional rainfall.
- 06.26.9** Maintenance arrangements for the SuDS features are set out to ensure effective long-term operation. The approach avoids the use of combined sewers and impermeable surfacing, and supports water quality objectives.

### Supporting Information

- 06.26.10** Please see the following documents submitted in support of this planning application for further details:

/ LR31 Flood Risk and SUDS Assessment (Stantec)

## 06.27 GROUND CONDITIONS

### Planning Policy

- 06.27.1** RBKC Policy GB18 (Contaminated Land) requires a preliminary risk assessment of contaminated land at the planning application stage. Where a satisfactory preliminary risk assessment identifies it is necessary, an intrusive site investigation and quantitative risk assessment are also required, in some cases at the planning application stage.
- 06.27.2** LBHF Policy CC9 (Contaminated Land), similar to above, requires an applicant to carry out a site assessment and submit a report of the findings in order to establish the nature and extent of any contamination.

### Application Scheme

- 06.27.3** A Phase 1 and 2 Ground Contamination Assessment has been undertaken by Stantec and accompanies this application. The objective of the report is to identify the likely ground conditions at the Site and immediately surrounding land and assess whether there are any significant land contamination or ground stability risks associated with the ground conditions that may require remediation or mitigation.
- 06.27.4** The results of the preliminary land contamination risk assessment indicate that the potential risk to sensitive receptors with the expected remediation/mitigation measures in place is, in general, Very Low. The exceptions relate to the risk to site workers during the proposed construction works for which the potential risk is assessed, at worst, to be Low. On this basis, any potential contaminants and hazardous ground gases and vapours do not by themselves represent an unacceptable risk to the human health, controlled waters or ecology associated with the proposed redevelopment of the Site as currently proposed.
- 06.27.5** From consideration of the assessed geoenvironmental risks Stantec concludes that there is no reason that the condition of the Site would be deemed incompatible with the intended use of the Site in accordance with relevant policy.

### Supporting Information

- 06.27.6** Please see the following documents submitted in support of this planning application for further details:

/ LR35 Ground Contamination Report (Stantec)

## 06.28 LANDSCAPE AND PUBLIC REALM

### Planning Policy

- 06.28.1** London Plan Policy G4 (Open space) requires development proposals where possible to create areas of publicly accessible open space, particularly in areas of deficiency.
- 06.28.2** London Plan Policy D8 encourages development proposals to encourage and explore opportunities to create new public realm where appropriate and ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.
- 06.28.3** RBKC Policy GB15 (Parks, Gardens and Open Spaces) Major development proposals will be required to provide new public open space on-site. Where it can be robustly demonstrated that on-site provision is not feasible or appropriate, a financial contribution will be required to enhance existing public open space or provision of new public open space.
- 06.28.4** LBHF Policy OS1 (Parks and Open Spaces) states that the Council will protect, enhance and increase provision of parks, open spaces and biodiversity in the borough.
- 06.28.5** LBHF Policy OS2 (Access to Parks and Open Spaces) seeks to reduce open space deficiency and will protect and enhance the quality of, and access to, existing open space.

### Landscape Proposals

- 06.28.6** A detailed landscape scheme has been developed by BDP for the Site with the approach being to:
- / Define a public realm character distinctive to Lots Road
  - / Create a green and playful heart to the scheme
  - / Maximise the creek edge
  - / Promote and active frontage to Lots Road
  - / Define a role to the western edge
  - / Enhance the relationship to Heatherley School of Fine Art
- 06.28.7** The landscape proposals for Lots Road South have been shaped by a strong landscape-led approach that integrates public realm and green infrastructure as a core element of the development. The design has been informed by early collaboration with landscape architects and engagement with local stakeholders, planning authorities, and design review panels. The strategy prioritises pedestrian experience, ecological enhancement, and the creation of varied and distinctive open spaces that respond to the Site's urban context and historic setting.

- 06.28.8** The public realm is structured around a series of connected, high-quality open spaces. Along Lots Road, the footway is widened and planted with retained and new trees to create a more generous and active frontage. This zone is designed to improve pedestrian comfort and reinforce the street's role as a key route, while integrating entrances and active uses at ground floor level. At the junction of Chelsea Harbour Drive, a prominent area of public realm has been introduced to form a new point of arrival into the Site, enhanced with planting, seating and clear sightlines.
- 06.28.9** Central to the scheme is a two-level linear garden between Blocks A and E, and Blocks B,C and D. The lower level forms a publicly accessible green space, designed as a new community square, with pathways, planting and seating that connect key pedestrian desire lines. Above, the first-floor level contains a communal residential garden incorporating planting, private terraces and shared amenity spaces for all residents as well as a dedicated space for Extra Care residents. The two levels are carefully differentiated through changes in height, planting boundaries and surface treatment, providing a clear delineation between public and private uses while maintaining visual continuity and openness.
- 06.28.10** Chelsea Creek forms the southern boundary of the Site and is a key asset in the landscape vision. Proposals include a new retaining wall, the creation of a waterside promenade, and the introduction of intertidal planting to enhance biodiversity. The materials and furniture used in this area reference the Site's industrial heritage, and the space is designed to support spill-out from ground floor uses, creating an active, south-facing edge that is both ecologically rich and publicly inviting.
- 06.28.11** The western edge of the Site is also designed as a 'pedestrian first' space, treated to the same high-quality design standards as the rest of the scheme but with a greater proportion of hard landscaping materials. It provides a shared surface paving treatment so that the servicing and delivery functions outlined earlier in this report can take place, as well as safeguarding emergency access routes. This area also provides breathing space to the adjoining rail-side green corridor, contributing to site permeability and protecting biodiversity.
- 06.28.12** At the northern boundary, the Arts Yard provides a shared courtyard space with unified paving, planting and lighting, strengthening the relationship with the Heatherley School of Fine Art and offering an enhanced setting for both the school and the new development

#### Open Space Quantum

- 06.28.13** The total area of open, private and shared space within the Site is 4,473sqm, which is broken down as follows:
- / Private amenity space: dedicated to Extra Care on Podium: 152sqm
  - / Private amenity space: Private Terraces: 115sqm
  - / Private amenity space: Rest of podium: 456sqm
  - / Improved land in Chelsea Creek: 463sqm
  - / Dedicated ecology area: 98sqm
  - / Block A cycle/refuse access: 61sqm
  - / Improved Highway Land: 306sqm

/ Improved Heatherley Art School open space: 280sqm

Supporting Information

**06.28.14** Please see the following documents submitted in support of this planning application for further details:

/ LR10 Proposed Landscape plans (BDP)

/ LR12 Landscape Statement (BDP)

## 06.29 PLAY SPACE

### Planning Policy

- 06.29.1** London Plan Policy S4 (Play and informal recreation) requires development proposals to enhance play opportunities and independent mobility for children, ensuring residential developments provide at least 10 square meters of good-quality, accessible playspace per child. Playspace should be stimulating, safe, integrated into the neighbourhood, incorporate greenery, be under passive surveillance, and not segregated by tenure.
- 06.29.2** RBKC Policy GB15 (Parks, Gardens and Open Spaces) states that major developments that include residential floorspace will be required to provide on-site external play space in accordance with London Plan Policy S4.
- 06.29.3** LBHF Policy OS3 (Playspace for Children and Young People) in new residential development that provides family accommodation; accessible and inclusive, safe and secure communal playspace will be required on site that is well designed and located and caters for the different needs of all children, including children in younger age groups, older children, teenagers and disabled children.

### Play Areas Summary

- 06.29.4** Based on the Greater London Authority's yield calculator for play space provision, the phase development will have 88.1 children, this results in a play requirement of 798.8 sqm for the Application Scheme.
- 06.29.5** This is broken down into areas targeted for each age group as follows:

Ages 0-4: 359sqm

Ages 5-11: 268sqm

Ages 12-15: 113sqm

Ages 16-17: 59sqm

**Total: 798.8sqm**

- 06.29.6** Total proposed play: 289 sqm. This means 509.8 sqm of play space will need to be provided off site

### Play Design Proposals

- 06.29.7** The play space strategy for Lots Road South focuses on delivering high-quality, integrated play opportunities for young children within a safe and well-overlooked environment. The design prioritises doorstep play for children aged 0–4 years, embedding it into the wider landscape framework rather than creating isolated or overly prescriptive areas. Play is incorporated into both the private and communal open spaces, enhancing their functionality and encouraging informal social interaction among residents.

**06.29.8** A total of 289 square metres of dedicated play space is provided within the scheme. This is concentrated in the first-floor communal residential garden, a secure area designed exclusively for residents and overlooked by surrounding homes. The play provision takes the form of a landscaped environment with structured equipment and informal elements that support creative and physical play. Features are integrated within soft planting and seating zones, ensuring that the space remains attractive and usable by a range of age groups without compromising residential amenity.

**06.29.9** Some additional incidental play opportunities are also embedded within the publicly accessible ground floor central garden, which is a pedestrian-priority zone. These informal features support the overall ambition for a family-friendly, inclusive development. However, given the spatial constraints of the Site and the focus on dense urban housing, the scheme does not meet the full quantitative GLA play space requirement across all age groups. The shortfall of 509.8 square metres will be addressed through a financial contribution secured via a Section 106 agreement, enabling off-site provision in local public open spaces. This approach aligns with feedback from local engagement, which favours concentrated, well-maintained public play areas over dispersed provision within private developments.

#### Supporting Information

**06.29.10** Please see the following documents submitted in support of this planning application for further details:

- / LR10 Proposed Landscape plans (BDP)
- / LR12 Landscape Statement (BDP)

## 06.30 ECOLOGY

### Planning Policy

- 06.30.1** London Plan Policy G1 (Green infrastructure) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- 06.30.2** London Plan Policy G5 (Urban greening) major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 06.30.3** London Plan Policy G6 (Biodiversity and access to nature) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 06.30.4** London Plan Policy G9 (Geodiversity) requires development proposals to make a positive contribution to the protection and enhancement of geodiversity.
- 06.30.5** LBHF Policy OS4 (Nature Conservation) proposals should enhance the nature conservation interest through initiatives such as new green infrastructure and habitats, tree planting and brown and green roofs and protect any significant interest on the Site and any nearby nature conservation area, appropriate to the scale and nature of the development.
- 06.30.6** Under LBHF Policy OS5 (Greening the Borough) the Council seeks to enhance biodiversity and green infrastructure including through maximising the provision of gardens, garden space and soft landscaping, seeking green or brown roofs and other planting as part of new development and seeking retention of existing trees and provision of new trees on development sites.

### Current Biodiversity

- 06.30.7** The application site currently supports a limited range of biodiversity, reflecting its predominantly urban and developed context. Habitats recorded on site include areas of hardstanding, buildings, ground-level planters, and introduced and mixed scrub. The mixed scrub, located primarily along site boundaries, provides some potential for supporting fauna, particularly birds and invertebrates. Ground-level planters and introduced shrub areas offer low ecological value, functioning mainly as ornamental landscaping with minimal structural diversity.
- 06.30.8** The current condition of the river is assessed as being in a poor to moderate state, with low habitat diversity, simplified channel morphology, and significant physical modifications affecting natural function. The riverbanks exhibit evidence of artificial reinforcement and encroachment, with riparian vegetation limited in structure and continuity. In-stream habitat is degraded, with uniform substrates and limited flow variation, leading to reduced

ecological potential. Water quality indicators and connectivity are also suboptimal, and the river fails to support a diverse or robust aquatic ecosystem under baseline conditions.

- 06.30.9** A number of protected and notable species were assessed during both the Preliminary Ecological Appraisal (PEA) and follow-up surveys. The Site has been assessed as having low potential for roosting bats, with no evidence of roosts detected during emergence surveys. However, occasional foraging and commuting activity by common bat species such as common pipistrelle (*Pipistrellus pipistrellus*) was recorded, mostly along vegetated boundaries and near the railway line.
- 06.30.10** Bird activity is present and includes species commonly associated with urban environments. Evidence of nesting potential was found in scrub and built structures, although no rare or notable bird species were identified. The Site also holds low potential for reptiles, otters, and water voles, with no records or habitat features supporting their likely presence. Invertebrate interest is limited by the small scale and low structural complexity of vegetated areas, though minor enhancements such as nectar sources or dead wood could increase this value.
- 06.30.11** Invasive species such as buddleia (*Buddleja davidii*) were identified on site, typical of urban brownfield habitats, and will require management. Overall, while current biodiversity is constrained by the Site's built character, some ecological value is provided by boundary vegetation and connectivity to nearby linear green infrastructure such as railway corridors.

#### Proposed Strategy

- 06.30.12** The proposed strategy to protect and enhance biodiversity focuses on avoiding harm to key ecological features, incorporating biodiversity net gain, and enhancing habitat quality across the Lots Road South site. A central measure is the application of the Statutory Biodiversity Metric, which assesses baseline conditions and models biodiversity uplift through habitat creation and enhancement. The strategy includes retention and enhancement of existing green infrastructure where possible, creation of new habitats with high distinctiveness, and implementation of features such as bat and bird boxes, green roofs, biodiverse planting schemes, and wildlife-friendly landscaping. Key mitigation measures involve sensitive lighting design to avoid disruption to bats and other nocturnal fauna, timing construction works to avoid bird nesting seasons, and removing invasive species. Ecological enhancements will target priority species and aim to provide multifunctional ecological networks.
- 06.30.13** At Chelsea Creek, the strategy aims to deliver measurable biodiversity improvements through riparian and in-watercourse habitat enhancements. The River Condition Assessment indicates the baseline condition is limited, with significant encroachment and low watercourse unit scores. In response, the proposal includes measures to improve riparian quality, reduce encroachment, and restore semi-natural features. Post-development, the watercourse condition is predicted to improve, contributing to a biodiversity net gain. Ecological function along Chelsea Creek will be supported through buffer planting, habitat connectivity improvements, and implementation of the Modular River Survey's recommendations. This approach aligns with policy requirements and supports regional green infrastructure objectives.

### Biodiversity Net Gain

- 06.30.14** The Biodiversity Net Gain Assessment for the Application Scheme identifies significant ecological improvements on-site through habitat creation. The baseline biodiversity values for the Site are 1.09 Habitat Units (HU) and 0.12 Watercourse Units (WU).
- 06.30.15** The post-development design proposals are predicted to deliver 2.84 HU. This is a net gain of equivalent to +159.50% for HU, thereby exceeding the mandatory 10% net gain threshold for habitats. Enhancements include creation of biodiverse green roofs, reedbeds, mixed scrub, and planting of 48 urban trees. Although the development retains all existing Watercourse Units, it does not achieve the required 10% uplift in this category due to constraints in improving the condition. As a result, a deficit of 0.012 WU must be addressed through off-site compensation.
- 06.30.16** The assessment confirms compliance with biodiversity net gain legislation and planning policy for terrestrial habitats, contingent upon implementation of a 30-year Habitat Management and Monitoring Plan (HMMP). The scheme does not trigger works to the watercourse itself, and potential on-site measures to meet the 10% WU target were deemed unfeasible due to space and access constraints. As such, off-site compensation will need to be pursued, ideally within the applicant's landholding, or alternatively via statutory credits. Qualitative ecological enhancements, such as bird and bat boxes and invertebrate habitats, are also recommended to support species of local importance. A Biodiversity Gain Plan (BGP) will be required post-permission to secure delivery.

### Supporting Information

- 06.30.17** Please see the following documents submitted in support of this planning application for further details:
- / LR33 Baseline River Condition Assessment (Greengage)
  - / LR45 Biodiversity Survey and Report (Greengage)
  - / LR46 Biodiversity Net Gain Assessment (Greengage)

## 06.31 TREES

### Planning Policy

- 06.31.1** London Plan Policy G7 (Trees and woodlands) states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system.
- 06.31.2** Under RBKC Policy GB16 (Trees) the Council will resist the loss of trees of value, based on amenity, historic or ecological value.

### Application Scheme

- 06.31.3** The arboricultural impact of the proposed development is minimal and well-managed. Only four low-quality (category C) trees are proposed for removal, alongside scrub and one stump, all of which are of limited amenity value and poor location. These removals are offset by the planting of 48 new trees, resulting in a net gain of 44 trees. The existing street trees, primarily field maples in good condition, will be retained and managed through sensitive pruning to maintain a sustainable relationship with the new buildings. An oak tree near the creek wall will be preserved through sensitive design. All retained trees will be protected with appropriate fencing and ground protection throughout demolition and construction, following BS 5837:2012 standards and arboricultural method statements.

The newly proposed landscaping scheme introduces a diverse mix of tree species selected for biodiversity value, seasonal interest, resilience, and long-term amenity contribution. The CAVAT value of the newly planted trees, even at year zero, significantly exceeds that of the removed trees, indicating a substantial arboricultural and ecosystem benefit. Specific methods are outlined for working within root protection areas, including air lance excavation and piling mat installation under supervision. Tree works, particularly to street trees, are to be coordinated with RBKC's tree team. Overall, the proposal demonstrates a positive arboricultural impact through careful retention, protection, and enhancement of the Site's green infrastructure.

### Supporting Information

- 06.31.4** Please see the following documents submitted in support of this planning application for further details:

/ LR43 Tree Survey and Arboricultural Impact Assessment (Sharon Hosegood Associates)

## **07. S106 HEADS OF TERMS AND COMMUNITY INFRASTRUCTURE LEVY**

### **07.1 DRAFT S106 HEADS OF TERMS**

#### **Employment**

##### Affordable Workspace

- 07.1.1** A detailed affordable workspace strategy will be developed and submitted.

##### Construction Skills and Training Contribution

- 07.1.2** Contribution to fund outreach, recruitment, initial training, pre-employment support, and ongoing skills development for local residents during the construction phase.

##### End-Use Employment and Training Contribution

- 07.1.3** Contribution to fund local outreach, job brokerage, and skills training initiatives aimed at recruiting and developing the local workforce in line with the number of jobs created by the development

#### **Housing**

##### Affordable Housing

- 07.1.4** Provision to secure affordable housing in perpetuity at appropriate rent levels and viability review.

##### Accessible Homes

- 07.1.5** Secure the provision of wheelchair accessible homes.

#### **Highways and Transport**

##### Travel Plan Monitoring Fee

- 07.1.6** Monitoring fee is required to cover the cost of monitoring the travel plan, approved under the conditions.

##### Parking Permits

- 07.1.7** Obligation to ensure future residents of the development are restricted from obtaining on-street parking permits.

## **Sustainability**

### Energy and Sustainability

- 07.1.8** Zero-carbon target can be achieved through a cash in lieu contribution to the borough's carbon offset fund. A carbon offset payment of £137,270 addresses residual emissions.

### Energy Performance Monitoring

- 07.1.9** Monitor of energy performance and report on it through an online monitoring portal.

## **Open Space and Ecology**

### Art and Culture

- 07.1.10** On-site contribution to delivering new arts and culture in line with RBKC's Culture Plan 2020–2021.

### Tree and Planter Maintenance

- 07.1.11** Financial contribution for the ongoing maintenance of planting and landscape within the public realm for five years.

### Biodiversity Net Gain

- 07.1.12** Contribution TBC depending on final BNG calculations. May not be required. Some LPAs have required BNG monitoring fees.

### Play

- 07.1.13** A financial payment via the S106 Agreement, to contribute towards the delivery of new/improved play space, as part of a local area Public Realm Improvements strategy which the Applicant understands RBKC is developing in consultation with the community.

## **S106 Monitoring and Legal Fees**

### Legal Costs

- 07.1.14** Payment of each authorities' reasonable costs in the preparation of the legal agreement.

### S106 Monitoring

- 07.1.15** Payment of section 106 monitoring fee upon completion of S106 agreement.

## 08. SUMMARY AND PLANNING BALANCE

### 08.1 APPLICATION SCHEME

- 08.1.1** The Application Scheme is for a detailed planning application for the redevelopment of a key brownfield site allocated under Site Allocation SA6 in the RBKC Local Plan. The scheme directly aligns with the strategic intent of SA6, delivering a high-quality, employment-led, mixed-use development that integrates new housing, flexible employment floorspace, a community facility, and significant public realm enhancements. It replaces fragmented, low-grade existing uses with a coherent, policy-compliant proposal that brings forward a sustainable and inclusive new neighbourhood.
- 08.1.2** The application has been informed by extensive consultation with RBKC, LBHF, the GLA, and the local community. Public engagement shaped design evolution, influencing building heights, housing mix, public realm features, and community uses. The Site's redevelopment also supports national and London-wide policy priorities to intensify brownfield land use, deliver genuinely affordable housing, and foster sustainable economic growth.
- 08.1.3** The application proposes 274 homes, of which 118 are affordable (comprising 65 extra care and 53 general needs units), all at social rent levels, and all designed to be tenure blind. The affordable housing is 44.5% affordable housing by habitable room (delivered as 100% social rent, providing the most affordable tenure of homes). The offer meets identified borough needs and compares favourably with a 50% affordable housing offer (with a policy compliant tenure mix, that would include intermediate homes).
- 08.1.4** The scheme also includes 2,038 sqm of non-residential floorspace delivering affordable workspace, flexible commercial units, and a community centre, which activate the ground floor frontages fulfilling SA6's emphasis on a regenerative, employment-led scheme and supporting the area's creative and SME economy. While the application departs from the exact employment floorspace quantum in SA6, it provides a justified and market-responsive employment offer, backed by commercial evidence and shaped by end-user demand. The application has also demonstrated that a scheme including 4,000 sqm of commercial space at the expense of 36 homes is not viable.
- 08.1.5** Sustainability is embedded throughout the proposal. The scheme achieves an 81% carbon reduction vs the GLA's 35% target and outperforms the GLA's target benchmarks for whole-life carbon. A high quality, integrated landscape-led design across the Site, including a linear park with the new community square, creekside promenade, upper-level communal gardens and green roofs result in a 0.4 Urban Greening Factor score. It promotes climate resilience through the addition of 48 new trees, sustainable drainage, biodiversity net gain, and other green infrastructure. A new creek wall and intertidal landscaping establish a robust flood defence to 6.40m AOD with a 100-year design life, while also creating habitat and improving ecological connectivity along Chelsea Creek.
- 08.1.6** The development's massing, layout, and architectural language are shaped by SA6's design principles. Taller elements are set away from Lots Road, and the built form incorporates varied building heights and courtyard

breaks to protect daylight and views, including to the adjacent Heatherley School of Fine Art. Active ground floor frontages and a new public square provide a welcoming and accessible public realm. The Site is car-free apart from eight accessible spaces and 382 long-stay cycle spaces in secured stores for residential and 19 long stay cycle places in the commercial units. 22 short-stay cycle parking spaces have been agreed with the LPA's to be provided in the landscape. This promotes active travel and reduce car dependency.

**08.1.7** In conclusion, the Lots Road South scheme represents a comprehensive and policy-compliant response to Site Allocation SA6. The Site is not subject to any allocation by LBHF and is 'white land' in the local plan map. It optimises an underused brownfield site to deliver much-needed housing, modern employment space, and sustainable placemaking, while embedding long-term climate resilience, biodiversity gain, and inclusive community infrastructure.

## **08.2 PLANNING BALANCE**

**08.2.1** The following section sets out the positive contributions the Application Scheme provides and demonstrates net public benefit.

### Underutilised brownfield site

**08.2.2** The redevelopment of the underutilised brownfield site at Lots Road South brings substantial benefits by transforming a fragmented and low-intensity land parcel into a high-density, mixed-use development that optimises land use in accordance with local and strategic planning policy. The Site is allocated under RBKC Policy SA6 and is well located for intensification.

**08.2.3** The scheme applies a design-led approach to high-density housing, integrating social rent extra care and social rent and open market general needs homes into a mixed-use development that aligns with policy objectives for housing delivery, social inclusion, and sustainable land use intensification.

**08.2.4** This should be afforded **very substantial weight** given the Government's stated intentions to prioritise the delivery of housing on brownfield land and the NPPF states that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs.

### Provision of New Homes

**08.2.5** The proposals will deliver 274 new homes, directly responding to the strategic housing priorities set out in national, regional, and local planning policy. The proposals contribute meaningfully to both borough's housing supply targets under the London Plan and the Government's Plan for Change, which prioritises brownfield redevelopment.

**08.2.6** RBKC is subject to a presumption in favour of sustainable development, and there is acute pressure to boost housing delivery across London. The latest Government-set housing target for London stands at 88,000 homes per annum. Against this, the current annual housing output across the capital has fallen to approximately 35,000 homes, with evidence indicating a declining trend.

- 08.2.7** This should be afforded **very substantial weight** given that the proposed housing delivery directly addresses acute local and strategic housing need identified by the Government, GLA, RBKC and LBHF.

#### Affordable Housing

- 08.2.8** The development provides 118 affordable homes, comprising 65 extra care and 53 general needs units, all offered at social rent levels. These are fully integrated and tenure-blind, ensuring no visual or material distinction from market housing. This provision supports long-term community stability across both RBKC and LBHF, addressing local housing need with a range of typologies suited to diverse households.
- 08.2.9** This level of genuinely affordable housing provision should be afforded **very substantial weight** in the planning balance.

#### Extra Care Homes

- 08.2.10** The scheme delivers 65 extra care homes within a dedicated block, all at social rent and prioritised for RBKC residents. These are fully self-contained, accessible units designed for older people needing support. The layout includes communal lounges, outdoor terraces, and proximity to the new community centre, promoting independence, social interaction, and access to services.
- 08.2.11** Given that the extra care affordable homes are social rent, address identified need and fully address Policy SA6, this should be afforded **substantial weight** in the planning balance.

#### Commercial Space

- 08.2.12** The scheme provides 2,038 sqm of flexible non-residential space including open market and affordable commercial space, a community centre, and a ceramics studio/art gallery. This mix supports the creative and design industries clustered in the area and with 684.3 sqm of affordable workspace to be leased to RBKC, helps maintain the Lots Road Employment Zone's economic and cultural role.
- 08.2.13** While the quantum of commercial floorspace is lower than the 4,000 sqm figure in SA6, it forms a prominent part of a balanced and deliverable mixed-use scheme that prioritises employment-led development within a constrained urban context. As detailed in the LR15 Commercial Report submitted with the application, the proposed quantum and configuration of commercial space reflects current and future occupier demand in the Lots Road Employment Zone. The new provision represents a qualitative and quantitative uplift in commercial space, supporting long-term economic resilience and creative sector growth. The mix of unit sizes, active frontage design, and flexible/adaptable internal layouts ensure the space is marketable to a range of users, while the inclusion of a significant proportion as affordable commercial space meets identified local needs.
- 08.2.14** Given the focus on high quality workspace appropriate for the employment zone, this should be afforded **neutral weight** despite the shortfall in overall quantum.

### Creek Wall

- 08.2.15** The proposal includes a new flood defence wall along Chelsea Creek, achieving a 6.40m AOD defence line with a 100-year design life. Works include landscaped embankments, intertidal terraces, and a setback zone for pedestrian access and habitat creation. These interventions ensure long-term flood resilience, biodiversity enhancement, and public access to the Creek edge.
- 08.2.16** These improvements should be afforded **significant** planning weight given the current condition of the creek wall and the improvements proposed to flood defences.

### Sustainability

- 08.2.17** The development incorporates a sustainability-led design, achieving an Urban Greening Factor of 0.4 and meeting (in some cases exceeding) targets on carbon reduction, circular economy, and overheating. Biodiverse roofs, 48 new trees, and sustainable urban drainage systems support climate resilience. The scheme delivers measurable Biodiversity Net Gain through the integration of intertidal habitats, biodiverse roofs, and native planting that enhance ecological value across the site. The design aligns with the energy hierarchy providing well insulated energy efficient homes, that seek to minimise energy costs for residents, and includes sustainability statements and whole-life carbon assessments.
- 08.2.18** These improvements should be afforded **significant** planning weight.

### Heights

- 08.2.19** The proposed development ranges from five to thirteen storeys, with taller elements located towards the western and southern edges of the site, away from Lots Road and sensitive heritage assets. This height strategy directly responds to the design principles of RBKC Site Allocation SA6 and the Lots Road South Design Brief SPD, which require variation in scale and positioning of taller elements to mitigate visual and heritage impacts.
- 08.2.20** The height and massing have been carefully developed through extensive design iterations and pre-application consultation with RBKC, LBHF, and the GLA. The approach ensures compatibility with the varied townscape context, stepping down towards the Lots Village Conservation Area while addressing the taller built form of the adjacent Imperial Gasworks site. The height is further justified by the site's allocation for high-density redevelopment and the objective to optimise brownfield land in line with London Plan Policy D3.
- 08.2.21** Given this policy alignment and the sensitive townscape response, the proposed height carries **moderate** weight in the planning balance.

### Public Realm and Communal Open Space

- 08.2.22** A new high-quality public realm transforms the fenced-off site into a permeable, landscaped environment. Key features include a creekside promenade, a central public square, widened pavements on Lots Road, and a

linear garden. New and improved public and communal open spaces total 3,736 sqm, prioritising pedestrian use, connectivity, and placemaking, and enhancing the urban setting.

- 08.2.23** These improvements should be afforded **substantial** planning weight given that the site currently contributes nothing in terms of public realm.

#### Play Space

- 08.2.24** 229 sqm of play space is provided for children aged 0–4, integrated within the communal gardens and public realm. The scheme includes an off-site contribution to address the shortfall in provision for older age groups, ensuring a comprehensive play strategy that supports families within the development.

- 08.2.25** This provision should be granted **moderate** planning weight.

#### Accessibility

- 08.2.26** The scheme is fully accessible, with all homes meeting Part M requirements. The extra care block incorporates dementia-friendly design principles. Step-free access is provided throughout, including to amenity spaces, public realm, and community facilities. Eight accessible parking bays and dedicated lift access support inclusive design for all users.

- 08.2.27** This provision should be granted **significant** planning weight.

#### Car Free

- 08.2.28** The development is car-free, reflecting strong local transport links and sustainability goals. Only eight accessible parking spaces are provided, reducing reliance on private vehicles. This supports active travel, improves air quality, and reduces congestion on Lots Road.

- 08.2.29** This provision should be granted **moderate** planning weight.

#### Cycle Parking

- 08.2.30** Cycle parking is integral to the scheme, with 382 long-stay cycle spaces in secured stores for residential and 19 long stay cycle places in the commercial units. 22 short-stay cycle parking spaces have been agreed with the LPA's to be provided in the landscape, promoting healthy sustainable travel. Long-stay provision is located within secure, weather-protected facilities, while short-stay spaces are distributed within the public realm for visitors, promoting modal shift and healthy transport choices.

- 08.2.31** This provision should be granted **significant** planning weight.

#### Conclusion

- 08.2.32** Taken as a whole, the Application Scheme delivers a comprehensive and well-balanced response to the Site's allocation and policy objectives, unlocking a complex brownfield site to provide a substantial quantum of

genuinely affordable housing, enhanced employment space, and significant public realm, ecological, and sustainability benefits. The proposals accord with national, regional, and local planning policy, and the cumulative benefits of the development clearly outweigh any limited adverse impacts. The scheme represents sustainable development and the planning balance weighs decisively in favour of granting permission.

## 08.3 CONCLUSION

- 08.3.1** In conclusion, the Lots Road South development delivers a comprehensive and policy-compliant response to the strategic opportunity presented by this underutilised brownfield site. It aligns with the RBKC Site Allocation SA6 and the associated Lots Road South Design Brief SPD, as well as policies set out in the London Plan, RBKC New Local Plan Review, and the LBHF Local Plan. The scheme brings forward 274 new homes, of which 118 are affordable, including 65 specialist extra care units and 53 general needs homes, all at social rent. This represents a significant and high-quality contribution to local housing need, especially for vulnerable and lower-income residents, and supports borough-wide and London-wide housing targets.
- 08.3.2** The proposals further provide 2,038 sqm of non-residential floorspace, including affordable commercial space, commercial units suited to the creative industries, and a community centre. These uses reinforce the employment-led identity of the Lots Road Employment Zone and contribute to the economic vitality of the area. The layout, height, and massing have been carefully designed to respect the surrounding context, responding sensitively to adjacent conservation areas and neighbouring uses, while delivering a distinctive and legible townscape. A new creek wall, biodiversity enhancements, extensive landscaping, and public realm interventions significantly improve flood resilience, access, and ecological value along Chelsea Creek. The development is car-free (except for disabled parking), prioritises walking and cycling, and meets key sustainability objectives, including an Urban Greening Factor of 0.4. It optimises the use of previously developed land and represents a well-balanced, sustainable and deliverable scheme, consistent with the overarching aims of national, regional, and local planning policy.



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