

## **LOTS ROAD NEIGHBOURHOOD FORUM RESPONSE TO MOUNT ANVIL'S LOTS ROAD SOUTH PLANNING APPLICATION**

### **Introduction**

This submission is from the Lots Road Neighbourhood Forum, which was established three years ago. Its membership comprises residents and business owners of Chelsea Riverside who have experienced two significant developments in the area – the Chelsea Academy and the Lots Road Power Station development, almost continually for the past twenty years. This provides them with unique and practical experience in understanding the intricacies and problems that such major work inevitably creates, and hopefully, in anticipating these concerns in advance, allows both Mount Anvil and RBKC to prevent them from happening again with the proposed Lots Road South Development.

That said, Mount Anvil's planning application for the Lots Road Development fails in all major respects to meet the objective criteria set out in the recently adopted RBKC New Local Plan, where the Site Allocation (SA6) was the subject of significant local consultation, a separate Supplementary Planning Document, and full discussion and negotiation with the Planning Inspector. The key failings include the quantum of development, the proposed heights of the development and the amount of employment space delivered, which fail the tests of the development being employment-led and the agent of change principle.

While the Forum welcomes the provision of the extra care facility and the provision of new social rent housing, we believe that this alone is insufficient to address the harms caused by a development that is largely non-compliant with the New Local Plan adopted in July 2024. Moreover, the local community believes that funding for the extra care facility should be derived from the sale of the old Dovehouse Street site, as originally committed to, and not be borne by the Lots Road community through the large number of for-profit homes being proposed.

Despite the local community's long-held and consistent concerns regarding the heights and massing of the development, the reduction in employment space within the Employment Zone and the level of green space available, there remains a desire to engage constructively with Mount Anvil, RBKC and the current Planning Application. The Forum and its members, therefore, believe that some of the harm and non-compliance could be ameliorated by addressing the following issues:

- Tackling the 'canyonisation' of Lots Road by reducing building heights and widening the pavement space.
- Design issues, especially those concerning brick colours and balcony design
- Local traffic congestion and the circulation of traffic on the site
- Construction methods and the Construction Traffic Management Plan, building on our experience of the Power Station development, to avoid the worst outcomes during the construction phase
- The future operation of the community centre and affordable workspace

## Objections and Proposed Changes

Set out below are the Forum's views on each of these issues, along with specific proposals on how Mount Anvil and RBKC, in its role as both developer and planning authority, can address our concerns. We believe that these proposals are both actionable and largely cost-neutral, or in some cases, should reduce both costs and the environmental impact of the development. A summary of the specific proposals is provided in Annex 1.

### 1. Canyonisation

'Canyonisation' refers to the visual impact of placing tall buildings along a relatively narrow road, the visual restriction resembling the overwhelming feeling of a canyon - an impact that is exacerbated when these tall buildings are considerably larger than the surrounding architecture. The images prepared by Mount Anvil as part of the planning application give a misleading impression of the impact of their building heights on the streetscape. One example of this is the view they have prepared looking North up Lots Road from the Lots Road from Chelsea Harbour Drive (Fig. 1).



Fig.1 Mount Anvil's illustration of building heights looking North from Chelsea Harbour Drive.

With this image you may be tempted to think that Blocks D and E, are of a similar scale to the buildings on the opposite side of the road or the taller five-storey buildings that can be viewed further towards the King's Road (Westfield Close and 554 King's Road). To dispel this false impression, the Forum has therefore prepared a more accurate drawing to illustrate the adverse effect of the proposed building heights, which are substantially larger than both those opposite and the existing five-storey building on Lots Road (Fig. 2).

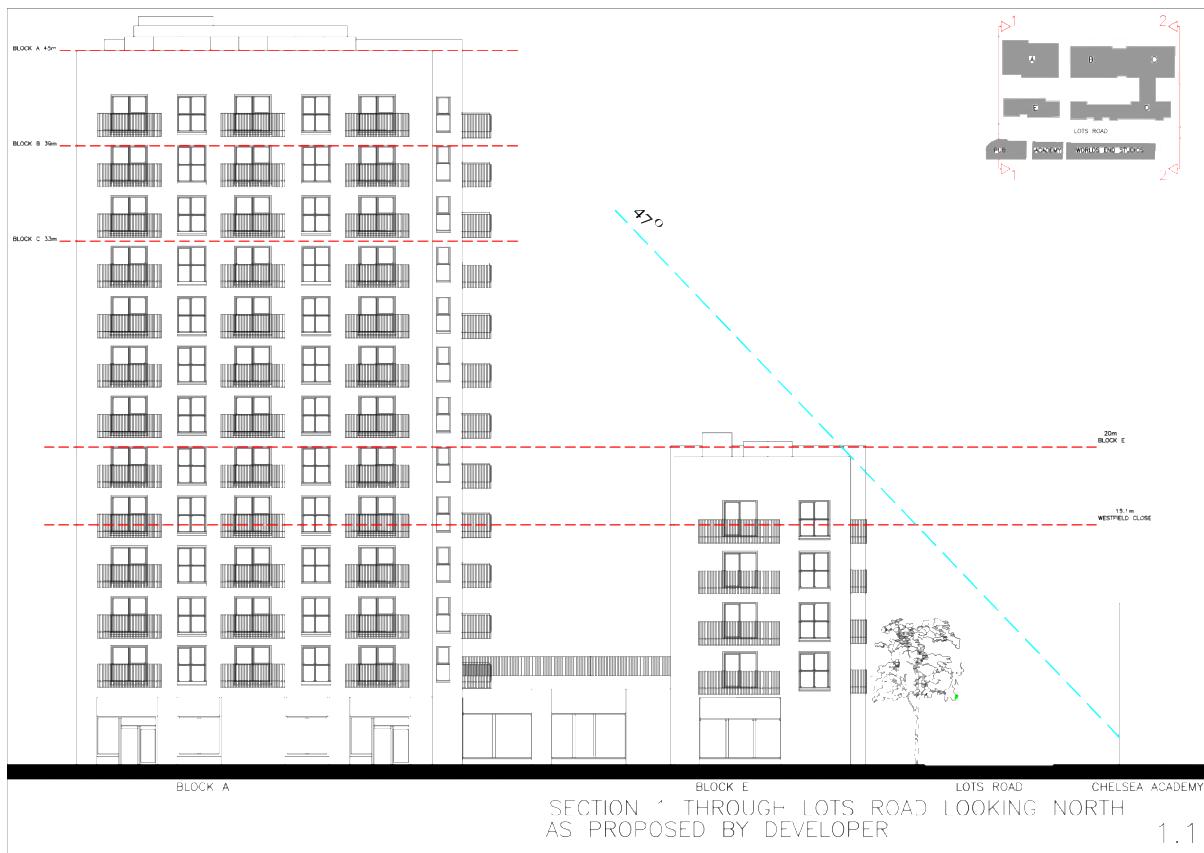


Fig. 2 The negative impact of Mount Anvil's proposed building heights looking North

### ***Building Heights***

Mount Anvil's proposals indicate that the heights of buildings fronting onto the Lots Road are:

#### **Block D**

Overall height 20.25m and 20.75m high  
 Ground storey flr/flr height 5.85m  
 Upper Floor storey heights 3.15m  
 Parapet Height 1.8m and 2.3m

#### **Block E**

Overall height 20m and 19.35m high  
 Ground storey flr/flr height 4.95m  
 Upper Floor storey heights 3.15m  
 Parapet Height 1.80m and 2.5m

The buildings at the rear (west) of the site are:

**Block A** 45m high  
**Block B** 39.3m high  
**Block C** 33.1m high

N.B. All dimensions are slightly approximate as they are 'measured' from the Planning Application drawings.

It can already be seen that Blocks D and E, while claiming to be five-storey buildings, are significantly higher than other five-storey buildings on Lots Road (Fig. 3), whose heights are:

#### **Westfield Close**

Overall height 14.95m high

Ground storey flr/flr height 3.35m

Upper Floor storey heights 2.675mm

Parapet Height 0.9m

#### **544 Kings Road**

Overall height 16.675m high

Ground storey flr/flr height 3.8m

Upper Floor storey heights 3.0m

Parapet Height 0.95m



544 KINGS ROAD AND WESTFIELD CLOSE

3.1

Fig. 3 Two existing five-storey buildings on Lots Road

While we acknowledge the effort made to locate the taller building within the development at the back of the site, adjacent to the railway embankment, the Community remains very concerned that the development on Lots Road would create a canyon effect. An impact that is exacerbated by the design's non-compliance with the Lots Road South design guidance, which specified there should be variations in roof design along Lots Road.

The site is immediately adjacent to and opposite the Lots Road Conservation Area. The proposals will result in a visual restriction, particularly between Block D and the 2-3 storey buildings opposite, which are in the Conservation Area (Fig. 4).

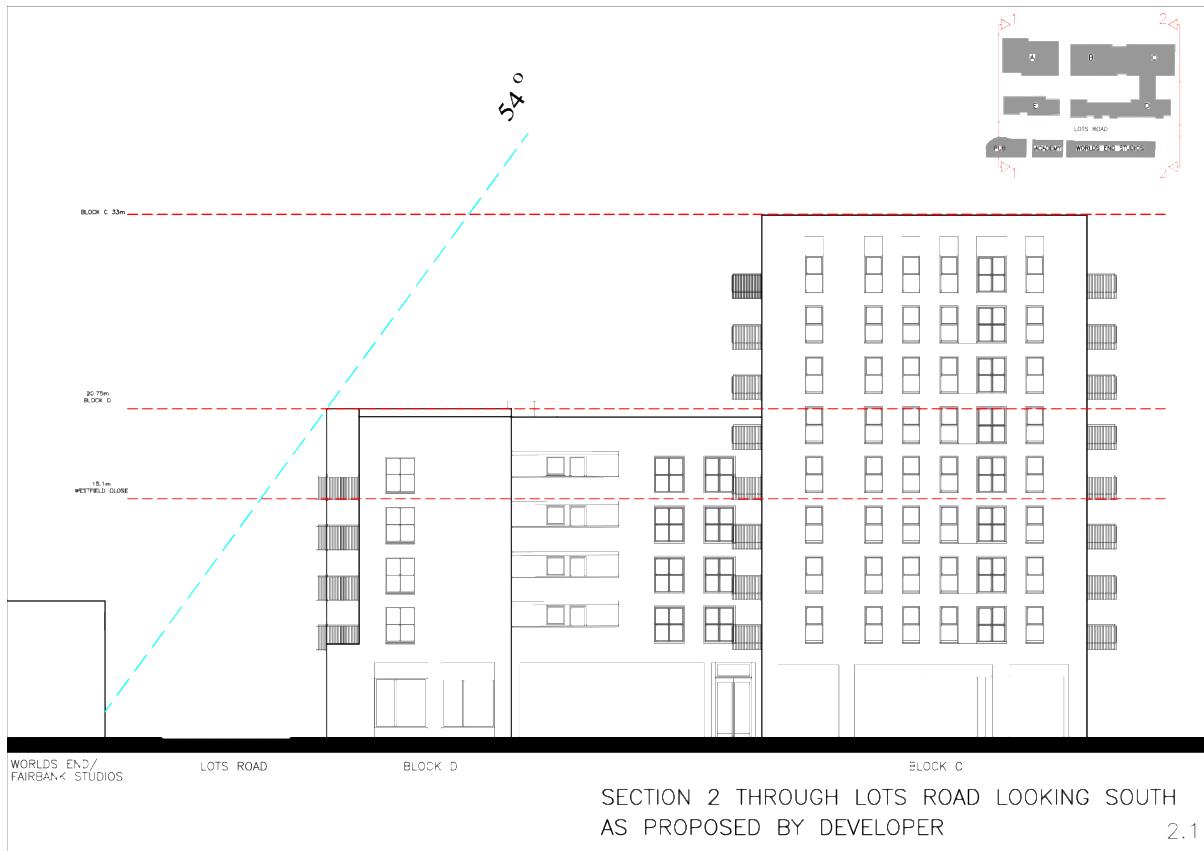


Fig. 4 The negative impact of Mount Anvil's proposed Block D looking South

The stated height of Blocks D & E is five storeys; however, with a 5.5m ground floor storey height and a rooftop parapet in excess of 1m high, they will appear and should be considered as six storeys. While Mount Anvil have argued that the parapet height is a safety measure on the rooftop, this could be achieved with a safety barrier placed further back on the roof away from the building edge, thus avoiding the need for the parapet height.

**Proposal 1.1** - The heights of Blocks E & D are effectively six storeys high. These heights should be reduced to five storeys in line with other buildings along Lots Road. The reduction in height can be achieved by some or all of the following measures:

- Reducing significantly the parapet heights. At the perimeter, the roof thickness may be increased away from the parapet to allow the introduction of additional insulation, green roofs, photovoltaic panels, etc.
- Safe roof access achieved with a fall arrest system and/or recessed guard railing/panels.
- Reducing the residential floor storey heights
- Reducing significantly the ground storey height

The new height should be approximately that of Westfield Close, resulting in a reduction of up to 5.8m across Blocks D and E.

The benefit of this reduction can be clearly in the drawing at Fig. 5. The height would be closer to the Westfield Close block in Lots Road, and the canyonisation of Lots Road, along with the negative effects this will have on the Conservation Area, will be partially ameliorated. This proposal should have both cost and environmental benefits, reducing the amount of construction materials needed.

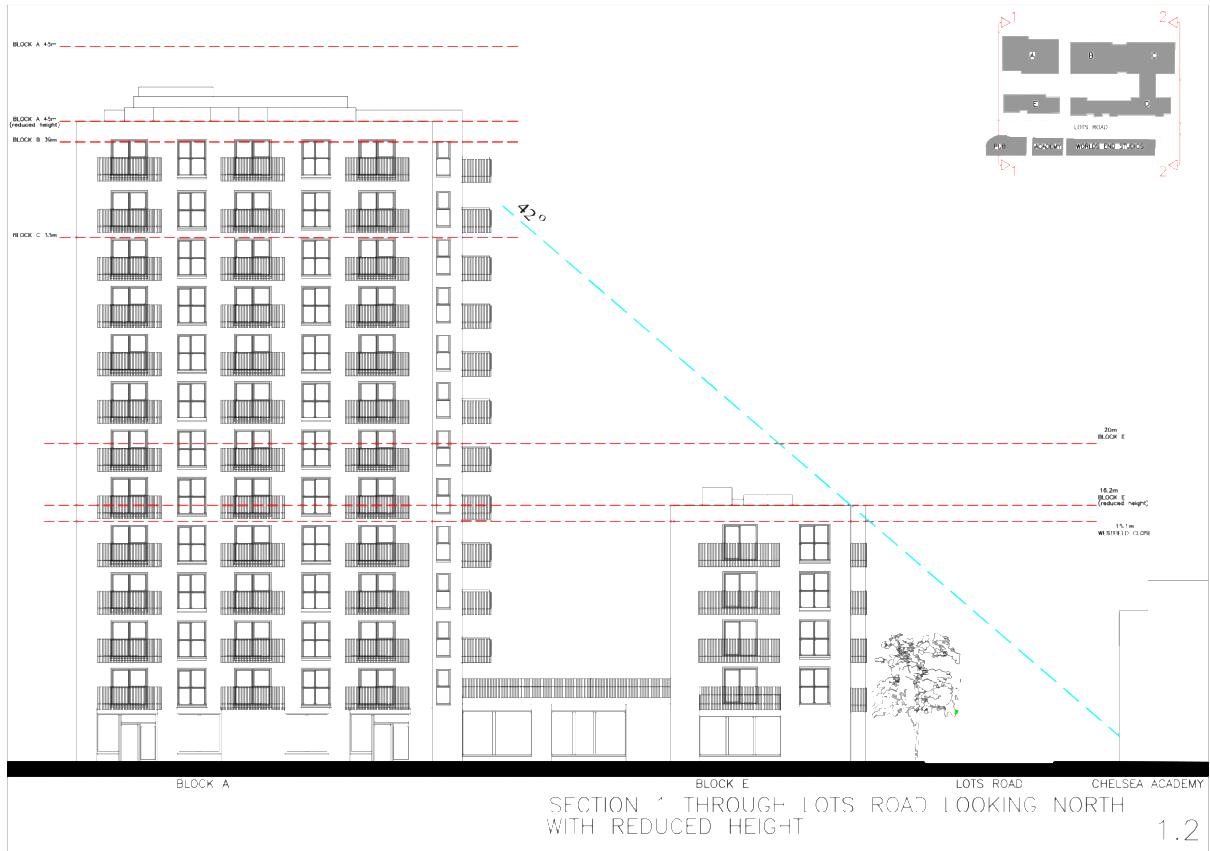


Fig. 5 Illustration of LRNF's proposed reduction in the heights of Blocks D and E

### ***Pavement width and streetscape***

At the northerly end of the site facing Lots Road, the prominent face of Block D is shown either on or very close to the existing pavement edge (see Fig. 4). Here, the pavement width is shown as 2.4m (this being only 0.25m more than the existing). The Green route, located on the west side of the site, adjacent to the railway line, has been abandoned, and access to the creek is limited due to the site's size. The proposed Lots Road façade is mostly continuous, and the larger part of the communal gardens is at first-floor level and private. The local community is determined that the streetscape amenity should be part of the local benefit.

***Proposal 1.2*** - Block D should be moved back from the pavement, so that the projecting bay has a pavement of 4.0m rather than 2.4m, as shown in Fig. 6. With this change, the line of trees in front of Block E can extend the full length of the development, which will soften the façade and humanise the street. The garden between D & B would then be of a similar width to that between E & A. If underground street services prevent continuous tree planting in front of Block D, the green line can be extended using other greening solutions, such as those recently used in Sloane Street. This proposal should be largely cost-neutral.

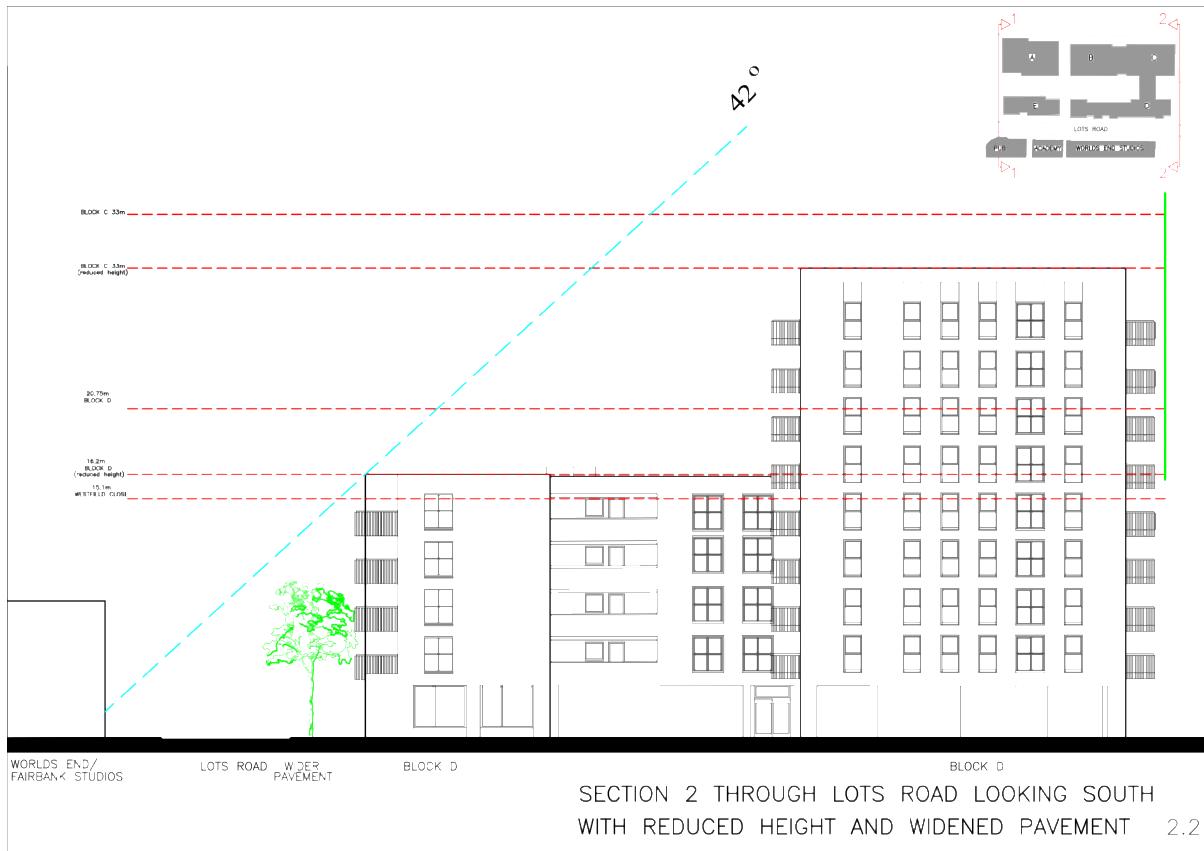


Fig. 6 Illustration of LRNF proposal to widen the pavement in front of Block D

## 2. Design issues, especially those concerning brick colours and balcony design

The Forum welcomes the efforts made to date to incorporate brick courses and architectural features that echo the late Victorian heritage of the Lots Village Conservation Area, as well as the more muted colour palette used in the latest illustrations. However, Forum members remain unhappy with many of the brick colours and balcony designs shown.

Given the experience of repeated changes and amendments during the course of the Power Station development, Forum members remain concerned that leaving issues such as the detailed choices of brick colours and the designs of the 200+ balconies to the post approval stage risks unacceptable final outcomes.

**Proposal 2** – Collaborate with the local community to finalise the materials to be used, and the final balcony designs should be progressed at a rapid pace and incorporated into the planning permission. Where this cannot be done, a detailed process should be established so that the community's views are fully reflected in all subsequent decisions. This proposal should be largely cost-neutral.

## 3. Local traffic congestion and the circulation of traffic on the site

Lots Road is already very congested, and this will only worsen when the Power Station site and Lots Road South are fully developed. The proposal shows deliveries, drop-offs, and

waste collection to be within the site. However, two loading bays are shown on Lots Road. These are likely to be the preferred option for delivery drivers rather than travelling through the site.

It is also understood that RBKC has offered to provide two disabled bays on Lots Road, rather than requiring the developer to provide the full quota of disabled facilities within the development. This is an unacceptable derogation from the developer's responsibility to fully provide disabled facilities, a bad planning precedent, and a further transfer of value from the Council tax-funded local authority to the developer.

***Proposal 3*** - As there is an on-site route for deliveries, drop-offs and waste collection, the proposed loading bays and disabled parking bays on Lots Road should be omitted. The provision of the entire disabled parking facility on site may incur a small associated cost. Still, in any case, it is a statutory requirement imposed on the developer and should not be borne by the local community.

#### **4. Construction methods, contamination and the Construction Traffic Management Plan (CMPT)**

Residents and businesses have been subject to significant development in the local area for over 20 years. They suffered greatly during the construction phase of the Chelsea Academy and the Power Station site, especially when both contractors and RBKC consistently ignored the CTMP.

##### ***Construction Methodology***

**Concrete & Piling** - It is noted that a concrete crusher will be retained on site. This will be noisy, dusty, and disruptive for the local community. Likewise, the new Creek wall should not be constructed using driven sheet piling that would also create an unacceptable level of noise for those who live and work close by. Concrete is to be delivered to the site rather than being batch mixed. This will require continuous deliveries on an already congested road, further complicated by the demands of not delivering during certain hours due to the proximity of the Chelsea Academy.

***Proposal 4.1*** - A concrete crusher should not be required on-site, and if needed, it should be located off-site. The Creek wall should not be constructed using driven sheet piling. All concrete should be mixed on-site, with the provision of a batching plant. This will significantly reduce the number of deliveries required. This should radically reduce transport movements and their associated financial and environmental costs.

##### ***Existing Contamination***

There is very little information available about the extent of the existing contaminated ground or the methods for addressing it. Forum members recall that an underground fire was caused by a previous scrap yard that poured battery acid into the ground and buried car tyres. The fire burned for several days, releasing caustic fumes that spread over the area and necessitated the evacuation of local buildings. Information on this incident should be available from the local authority or the fire service. More recently, residents have been impacted by the

decontamination works at the Kings Road Park site in Hammersmith & Fulham, highlighting the issue and the wide area impacted by remediation works.

***Proposal 4.2*** - The conclusion that there is little risk to the locality from the contaminated ground should be thoroughly examined before planning. The results of all investigations should be shared with the local community and dealt with transparently and thoroughly in the planning process. At this stage, it is impossible to estimate the cost impact, but this is a major omission and not an optional cost.

### ***Construction Traffic Management Plan (CMPT)***

At the appointment stage, the Council ran a competition to choose a developer partner. Mount Anvil made much of their ability to plan, manage, and control the construction of the development, not least because of their ability to act as both developer and contractor. It is therefore particularly disappointing that the Construction Traffic Management Plan (CTMP), as currently submitted, is generic and lacking in any substantive analysis or solutions. The local community have suffered from this process of poor retrospective CTMP conditions and management previously, and we believe the CMPT should not be left to be agreed after Planning Permission is granted.

***Proposal 4.3*** - A detailed CTMP should be developed and agreed upon as part of the initial Planning Application process, rather than being left to the post-planning permission phase. Any approved CTMP should ensure that there are strict procedures in place for monitoring and enforcement during construction. This should include the installation of CCTV and noise monitoring. Meaningful and persuasive penalties should be in place for any breach. Alongside the developer's dedicated liaison person, RBKC should nominate a dedicated/named enforcement officer with whom the community can work to ensure compliance. Additional costs cannot be estimated, as they will only be incurred if the developer fails to meet their commitments.

## **5. Operation of the community centre and affordable workspace**

Aside from the extra care facility and the social rent housing, where the benefits apply to all the residents of RBKC and H&FC, the two aspects of the development that should deliver specific benefits to local residents and businesses are the dedicated community centre and the affordable workspace. However, again coloured by the experience of the Power Station development, Forum members remain sceptical that these benefits will be delivered at the end of the project, or if these facilities exist, that they will be run in a way that provides the expected benefits. For example, will the community centre have the staff and management to deliver a viable and accessible space for community groups? Further, what local businesses are expected to use the affordable workspace, especially given that it is currently designed as a space without any natural light?

***Proposal 5*** – RBKC officers should develop detailed plans, in consultation with the local community, for the operation of the community centre and the affordable workplace. These should be in place before planning permission is granted. Developing proposals now will incur a small administrative cost, but it should ensure that RBKC receives value for money throughout the project's life.

## Annex 1

### **LOTS ROAD NEIGHBOURHOOD PROPOSALS TO AMELIORATE THE MOST HARMFUL ASPECT OF MOUNT ANVIL'S PROPOSALS FOR LOTS ROAD SOUTH**

***Proposal 1.1*** - The heights of Blocks E & D are effectively six storeys high. These heights should be reduced to five storeys in line with other buildings along Lots Road. The reduction in height can be achieved by some or all of the following measures:

- Reducing significantly the parapet heights. At the perimeter, the roof thickness may be increased away from the parapet to allow the introduction of additional insulation, green roofs, photovoltaic panels, etc.
- Safe roof access achieved with a fall arrest system and/or recessed guard railing/panels.
- Reducing the residential floor storey heights
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The new height should be approximately that of Westfield Close, resulting in a reduction of up to 5.8m across Blocks D and E. With these heights the canyonisation of Lots Road, along with the negative effects this will have on the Conservation Area, will be partially ameliorated. This proposal should have both cost and environmental benefits, reducing the amount of construction materials needed.

***Proposal 1.2*** - Block D should be moved back from the pavement, so that the projecting bay has a pavement of 4.0m rather than 2.4m. With this change, the line of trees in front of Block E can extend the full length of the development, which will soften the façade and humanise the street. The garden between D & B would then be of a similar width to that between E & A. If underground street services prevent planting in front of Block D, the green line can be extended using other greening solutions, such as those recently used in Sloane Street. This proposal should be largely cost-neutral.

***Proposal 2*** – Collaborate with the local community to finalise the materials to be used, and the final balcony designs should be progressed at a rapid pace and incorporated into the planning permission. Where this cannot be done, a detailed process should be established so that the community's views are fully reflected in all subsequent decisions. This proposal should be largely cost-neutral.

***Proposal 3*** - As there is an on-site route for deliveries, drop-offs and waste collection, the proposed loading bays and disabled parking bays on Lots Road should be omitted. The provision of the entirety of the disabled parking facilities on site may have a small associated cost, but in any case, it is a statutory requirement placed on the developer and should not be borne by the local community.

***Proposal 4.1*** - A concrete crusher should not be required on-site, and if needed, it should be located off-site. The Creek wall should not be constructed using driven sheet piling. All concrete should be mixed on-site, with the provision of a batching plant. This will significantly reduce the number of deliveries required. This should radically reduce transport movements and their associated financial and environmental costs.

***Proposal 4.2*** - The conclusion that there is little risk to the locality from the contaminated ground should be thoroughly examined before planning. The results of all investigations should be shared with the local community and dealt with transparently and thoroughly in the planning process. At this stage, it is impossible to estimate the cost impact, but this is a major omission and not an optional cost.

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***Proposal 5*** – RBKC officers should develop detailed plans, in consultation with the local community, for the operation of the community centre and the affordable workplace. These should be in place before planning permission is granted. Developing proposals now will incur a small administrative cost, but it should ensure that RBKC receives value for money throughout the project's life.

## **Annex 2**

### **Larger Format Drawings:**

Fig. 2 The negative impact of Mount Anvil's proposed building heights looking North

Fig. 4 The negative impact of Mount Anvil's proposed Block D looking South

Fig. 5 Illustration of LRNF's proposed reduction in the heights of Blocks D and E

Fig. 6 Illustration of LRNF proposal to widen the pavement in front of Block D

