

Planning and Place

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place

Amanda Reid



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Wandsworth Council
The Town Hall
Wandsworth High Street
SW18 2PU

Date: 21/11/2024
My Ref: OB/24/07225

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are OBJECTIONS to the proposal.

SCHEDULE

Development:

Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 28 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works (Revised application to building heights and also to include an increase in affordable housing to 50%).

Site Address:

The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ

RBKC Drawing Nos:

N/A

Applicant's Drawing Nos:

N/A

Application Dated:

31/10/2024

Application Completed:

21/11/2024

FULL REASON(S) ATTACHED AT APPENDIX 1.

REASON(S)

1. The proposed development by virtue of its siting, height, and form would result in a discordant, dominate, and oppressive building. The proposal would harm the special interest of the Thames and Cheyne Conservation Areas which are defined by the open character and special relationship with the river Thames. Further, the development would disrupt the established trajectory of height which increases only to the west of Battersea Bridge. The development would fail to comply with Local Plan Policies CD1, CD2, CLD3, CD4, CD5, CD8, CD15.

INFORMATIVES

1. Without prejudice to the objection to the proposed development listed above, the Royal Borough of Kensington and Chelsea would recommend any approval be accompanied by a condition for a final Construction Logistics Plan (CPS). The final CPS should include the following measures:
 - i. Contractors to be FORS gold accredited;
 - ii. Vehicles should be fitted with Protective Safe Systems (PSS); and
 - iii. Targets should be set for the use of low and no emissions construction vehicles.

Without the imposition of such a condition the Royal Borough of Kensington and Chelsea would lodge an objection on the basis of the impact to the borough from construction traffic during the course of the development phase.

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/281810. If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours sincerely,

Amanda Reid
Director of Planning and Place

Appendix 1

Summary report on application

1. The site and its surroundings

- 1.1 The application site referred to as 'One Battersea Bridge' [the site] is within Wandsworth Council's administrative boundaries. The site is located to the south of the Royal Borough of Kensington and Chelsea (RBKC), separated by the river Thames, and joined via the Battersea Bridge. The site is widely visible from Cheyne Walk and Chelsea Embankment due to its prominent position adjacent to the river and juncture with the Battersea Bridge.
- 1.2 The site currently houses a part five, part six storey 1980s office building with basement car park. The site is bounded by the Thames and the Thames footpath to the north, the Battersea Bridge Road to the west, Hester Road to the south, Thames Walk apartments to the immediate east, which separates the site from the Albion Riverside development.
- 1.3 The site is within Flood Zone 3 and adjacent to a Site of Nature Conservation Importance: River Thames and Tidal Tributaries. The Battersea Park Conservation Area is suited to the east of the site on south bank and the Westbridge Road Conservation Area to the southwest.
- 1.4 The site is within the setting of the northern bank of the Thames and as such RBKC. The Thames and Cheyne Conservation Areas extend to the north of the site and north-east/west of the Battersea Bridge respectively. Several listed buildings are located along Cheyne Walk which extends to the west of Battersea Bridge and Chelsea Embankment to the east of the bridge.
- 1.5 Those listed structures within the setting of the site include but are not limited to; the Battersea Bridge (Grade II), 91 – 94 Cheyne Walk (Grade II), 107 – 109 Cheyne Walk (Grade II), Chelsea Old Church (All Saints) (Grade I), Crosby Hall (Grade II*), and The Embankment from Battersea Bridge to the southwestern corner of the Royal Hospital Grounds (Grade II).

2. The proposal

- 2.1 This Borough is asked for its observations on amended plans for an application received by Wandsworth Council (ref. 2024/1322) which seeks planning permission for:

“Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 10 storey, part 28 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works (Revised application to building heights and also to include an increase in affordable housing to 50%)”.

- 2.2 The Royal Borough raised objection to previous proposals for application ref. 2024/1322, which sought planning permission for:

“Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 9 storey, part 33 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community uses (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works”.

2.3 Objection was raised based on the following matters:

1. “The proposed development by virtue of its siting, height, and form would result in a discordant, dominate, and oppressive building. The proposal would harm the special interest of the Thames and Cheyne Conservation Areas which are defined by the open character and special relationship with the river Thames. Further, the development would disrupt the established trajectory of height which increases only to the west of Battersea Bridge. The development would fail to comply with the aims of the National Planning Policy Framework, London Plan Policies D4, D8, D9 and Wandsworth Local Plan Policies LP1, LP3, and LP4.
2. The proposal has failed to adequately address the construction impact to the Royal Borough of Kensington and Chelsea road network, contrary to Local Plan Policy CT1.

2.4 Since the Royal Borough of Kensington and Chelsea lodged its objections on the 1 July 2024 the Council has adopted a new Local Plan 2024. The primary changes to the application focus on a reduced proposed height of 28 storeys plus ground and basement and an increased affordable housing provision of 50%.

2.5 The below assessment will focus only on the changes proposed regarding the amended height of the building and transport matters. For the details of the Royal Borough of Kensington and Chelsea’s previous comments please see the original objection lodged on the 1 July 2024 (Appendix 2).

3. Main relevant policies and strategies relevant to the decision

The development plan

3.1 The main planning considerations applying to the site and the associated policies are:

	Local Plan
Heritage Assets	CD3 – Heritage Assets; CD4 – Heritage Assets – Conservation Areas; CD5 – Heritage Assets – Listed Buildings.
General townscape	CD1 – Context and Character; CD2 – Design Quality, Character and Growth; CD8 – Tall Buildings; CD15 – Views.
Living conditions	CD9 – Living Conditions.
Transport	TR5 – Land Use and Transport; TR6 – Active Travel; TR8 – Car Parking; TR9 – Servicing.

These documents can be read online at:

Local Plan 2024:

4. Evaluation

4.1 The decisive issues are:

- i. Whether the proposals would have an acceptable impact on views into and out of the Royal Borough and on neighbouring conservation areas;
- ii. Whether the proposals would safeguard the setting of the listed building within the Royal Borough;
- iii. Whether the proposals would have an acceptable impact on transport within the Royal Borough.

Character and appearance and safeguarding the setting of the listed building

- 4.2 The proposed development would be located within the policy thresholds of the London Plan 2021, Wandsworth Local Plan, and the National Planning Policy Framework. The Royal Borough of Kensington and Chelsea [the borough] has previously objected to the development due to the impact to the special interest of the Thames and Cheyne Conservation Areas and the wider townscape due to the proposed height, siting, and form. For a full review of the boroughs previous comments please see Appendix 2.
- 4.3 The application has been subject to amendments which have reduced the overall height of the building from 33 to 29 storeys. Wandsworth Local Plan Policy LP4 defines tall buildings to be buildings which are seven storeys or over from the ground level to the top of the building. Criterion (B) of this policy identifies that proposals for tall buildings will only be appropriate in tall building zones where the development would not result in any adverse visual, functional, environmental and cumulative impacts.
- 4.4 The proposed development sits just outside of an identified tall building zone in accordance with Wandsworth Local Plan Policy LP4. The proposal therefore remains contrary to policy and exceeds the maximum height requirements. The tall building zone the site aligns with is identified as TB-B2-04, which outlines existing heights as 3– 18 storeys and stipulates appropriate height as between 7– 12 storeys. The development at 29 storeys would exceed appropriate building heights and is contrary to Wandsworth Council's Local Plan.
- 4.5 The overall height of the building is important from the perspective of the riverside environment, townscape, and associated conservation area settings. As previously set out the site is in a 'sandwich' of development between the Chelsea and Albert Bridges. The relative building heights in this clearly defined area are low with a maximum height of 11 storeys to the southern embankment (Wandsworth) and six to the northern (RBKC).
- 4.6 The importance of the low-rise nature of development to the northern and southern embankments in this location is to provide an open environment around the river frontage for pedestrians. Further, it provides visual relief to statistically important open spaces represented primarily by the Royal Hospital Gardens, Chelsea Embankment Gardens, and Battersea Park. The proposed height of 29 storeys would have a clear and distinct impact on the setting of these areas and would dominate the immediate skyline and river environment.
- 4.7 The dominance and oppressive character that would be introduced by a development of 29 storeys would be further emphasised by the glazed fabric of the proposed building. The

glazing results in a generic and monolithic appearance to the built form which contrast with the general character of the area which is both varied and reflective of the riverside.

- 4.8 As previously identified, the application site sits within the setting of the Royal Borough of Kensington and Chelsea and its associated heritage assets and townscape. The application site's location to the southern embankment of the River Thames would place the proposed development directly in the well valued riverside setting of RBKC, on the northern bank of the Thames. Great weight is applied to the riverside views' vistas, architecture, and special context.
- 4.9 The Royal Borough of Kensington and Chelsea's valued river frontage is located within both the Thames and Cheyne Conservation Areas, for which the Thames Conservation Area extends into the centre of the river adjoining the borough of Wandsworth. As previously identified, the prevailing character of both the northern and southern banks of the Thames in this location is open, verdant, with low rise development rising away from the river edges and to the east and west of the Battersea and Albert Bridges.
- 4.10 London Plan Policy HC1 (C) requires that development affecting the setting of heritage assets conserve their significance. Wandsworth Local Plan Policy LP3 requires development, preserve, and where possible, enhance the significance, appearance, character, function, and setting of any heritage asset and the historic environment.
- 4.11 RBKC Local Plan 2024 Policy CD3 (D) states that:
- “Any harm to, or loss of, the significance, of a designated heritage asset, including, to its setting, will require clear and convincing justification...”.
- 4.12 Criterion (E) of RBKC Local Plan Policy states that:
- “Where development is proposed in the setting of a designated heritage asset: ...
(2) Where the setting of the designated heritage asset makes a positive contribution to its significance, development which affects that setting will be permitted if it preserves or enhances the significance of the designated heritage asset”.
- 4.13 The reduction in height from 33 to 29 storeys would remain distinctly visible from both within and in the setting of the Cheyne and Thames Conservation Areas. The resulting impact due to the height, massing, and materiality would result harm to the setting of these heritage assets.
- 4.14 Specifically, the proposed developments height would rise above the parapet line of many of the Georgian residential buildings and to the grounds of the Royal Chelsea Hospital. Currently the skylines in these areas are relatively unimpeded by modern development. The proposed height, form, and use of glazing would sharply punctuate the skyline contrasting and disrupting the low-rise skyline which frame these areas that contain valued historic architecture.
- 4.15 The proposed development would continue to fail to preserve the setting of the Royal Borough of Kensington and Chelsea historic and valued townscape, river frontage, and associated conservation areas. The development would fail to comply with Local Plan 2024 Policies CD1, CD2, CD3, CD4, CD5, CD8, and CD15. The development would also depart from the policies of the London Plan 2021 and those of Wandsworth borough.

Transport

- 4.16 Previously the Royal Borough of Kensington and Chelsea [the borough] objected to the development in part due to the failure to address the construction traffic impact to the borough resulting from the proposed development.
- 4.17 The application site would be accessed from Battersea Bridge Road, which forms part of the Transport for London Road Network. Transport for London are therefore the responsible body for the Battersea Bridge Road. The application site is located within 130 meters from the borough boundary which is located at the mid-point of Battersea Bridge.
- 4.18 Local Plan 2024 Policy TR5 requires development to be in suitable areas where transport requirements can be met in a sustainable manner, which actively encourages travel by sustainable modes. Local Plan 2024 Policy TR9 criterion (B) states that development must provide sufficient on-site servicing space where feasible.
- 4.19 It is noted that vehicular access and servicing would occur to the rear of the proposed block away from Battersea Bridge Road as per the existing arrangement. As per the previous comments provided the Transport Officer has stated that there would be no material impact to the traffic operation to the borough once the development is in situ.
- 4.20 The associated Transport reports submitted with the application have set out the proposed construction programme for the development. During construction the inbound access route, to a proposed pit lane on Battersea Bridge Road, would pass through the borough. It is identified that up to 19 construction vehicles a day are expected to utilise the access.
- 4.21 The construction traffic route has not been specified. However, it is likely that vehicles routing towards the site would use the Earl's Court one way system and potentially the King's Road/Beaufort Street route and depart to the south (away from the borough). The Beaufort Street, Chelsea Embankment, Battersea Bridge Road, and Chylene Walk junction are sensitive in nature, regarding conflict between larger vehicles and vulnerable road users/pedestrians.
- 4.22 Details of a final Construction Logistics Plan (CLP) should be worked up pursuant to a Planning condition, for which the Royal Borough of Kensington should be engaged. Mitigation for construction traffic impacts to the borough would need to be set out within such a condition. These measures included in a final CLP should require:
- i) Contractors to be FORS gold accredited;
 - ii) Vehicles should be fitted with Protective Safe Systems (PSS); and
 - iii) Targets should be set for the use of low and no emissions construction vehicles.
- 4.23 Subject to the provision of the condition outlined above, the borough would withdraw its objections pertaining to construction traffic.

Issues and balancing

- 4.24 The proposed development would conflict with the policies of the Royal Borough of Kensington and Chelsea Local Plan 2024, London Plan 2021, and National Planning Policy Framework. The development would harm the setting of the Thames and Cheylene Conservation Areas, associated listed structures, and character and appearance of the area.
- 4.25 The proposed development would fail to comply with Local Plan 2024 policies CD1, CD2, CD3, CD4, CD5, CD8, and CD15.

5. Consultations carried out

5.1 No notifications have been carried out by this Borough.

5.2 1 letter was received objecting to the application, summarised as:

Comment	Response
<p>The objector is in agreement with the comments made by Historic England who state, "it would continue to cause harm to the Cheyne Conservation Area, the Royal Chelsea Hospital, Battersea Park, the Albert Bridge, and the Westbridge Road Conservation Area in our opinion". Thousands of Chelsea residents would be more affected by the proposed 28 storey eyesore than Wandsworth residents. The development would dwarf the bridges and Historic Chelsea Embankment. The plans are in conflict with Wandsworth's own Local Plan Policy LP4 which identifies the area as suitable for a building of no more than seven storeys. No exceptional circumstances which would justify the proposed height.</p>	<p>The proposed development would exceed the overall height restrictions stipulated by Wandsworth Local Plan. Further the development would result in harm to the heritage assets and townscape located within the Royal Borough of Kensington and Chelsea. The borough objects to the proposed development.</p>

6. Recommendation

6.1 Raise Objections.

Appendix 2

Planning and Place

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place

Amanda Reid



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

Wandsworth Council
The Town Hall
Wandsworth High Street
SW18 2PU

Date: 01/07/2024
My Ref: OB/24/03625

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are OBJECTIONS to the proposal.

SCHEDULE

Development:

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Site Address:

The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ

RBKC Drawing Nos:

OB/24/03029

Applicant's Drawing Nos:

N/A

Application Dated:

30/05/2024

Application Completed:

28/06/2024

FULL REASON(S) ATTACHED AT APPENDIX 1.

REASON(S)

2. The proposed development by virtue of its siting, height, and form would result in a discordant, dominate, and oppressive building. The proposal would harm the special interest of the Thames and Cheyne Conservation Areas which are defined by the open character and special relationship with the river Thames. Further, the development would disrupt the established trajectory of height which increases only to the west of Battersea Bridge. The development would fail to comply with Local Plan Policies CL1, CL2, CL3, CL11, CL12, and CR2.
3. The proposal has failed to adequately address the construction traffic impact to the Royal Borough of Kensington and Chelsea road network, contrary to Local Plan Policy CT1.

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/281810. If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours sincerely,

Amanda Reid
Director of Planning and Place

Summary report on application

1. The site and its surroundings

- 1.1 The application site referred to as 'One Battersea Bridge' [the site] is within Wandsworth Council's administrative boundaries. The site is located to the south of the Royal Borough of Kensington and Chelsea (RBKC), separated by the river Thames, and joined via the Battersea Bridge. The site is widely visible from Cheyne Walk and Chelsea Embankment due to its prominent position adjacent to the river and juncture with the Battersea Bridge.
- 1.2 The site currently houses a part five, part six storey 1980s office building with basement car park. The site is bounded by the Thames and the Thames footpath to the north, the Battersea Bridge Road to the west, Hester Road to the south, Thames Walk apartments to the immediate east, which separates the site from the Albion Riverside development.
- 1.3 The site is within Flood Zone 3 and adjacent to a Site of Nature Conservation Importance: River Thames and Tidal Tributaries. The Battersea Park Conservation Area is suited to the east of the site on south bank and the Westbridge Road Conservation Area to the southwest.
- 1.4 The site is within the setting of the northern bank of the Thames and as such RBKC. The Thames and Cheyne Conservation Areas extend to the north of the site and

north-east/west of the Battersea Bridge respectively. Several listed buildings are located along Cheyne Walk which extends to the west of Battersea Bridge and Chelsea Embankment to the east of the bridge.

- 1.5 Those listed structures within the setting of the site include but are not limited to; the Battersea Bridge (Grade II), 91 – 94 Cheyne Walk (Grade II), 107 – 109 Cheyne Walk (Grade II), Chelsea Old Church (All Saints) (Grade I), Crosby Hall (Grade II*), and The Embankment from Battersea Bridge to the southwestern corner of the Royal Hospital Grounds (Grade II).

2. The proposal

- 2.1 This Borough is asked for its observations on an application received by Wandsworth Council (ref.2024/1322) which seeks planning permission for:

“Comprehensive redevelopment of the site to include demolition of existing building and erection of a part 9 storey, part 33 storey building (plus ground floor and basement levels) comprising residential use (Class C3), office use (Class E), community use (Class F2), and a restaurant (Class E), with associated car parking, cycle parking, public realm, landscaping and other associated works”.

3. Main relevant policies and strategies relevant to the decision

The development plan

- 3.1 The main planning considerations applying to the site and the associated policies are:

	Local Plan	New Local Plan Review
Conservation Area	CL3 – Heritage Assets – Conservation Areas and Historic Spaces	CD3 – Heritage Assets – Conservation Areas
General townscape	CP3 – Quality CR2 – Three-Dimensional Street Form. CL1 – Context and Character. CL2 – Design Quality CL11 – Views CL12 – Building Heights	T2 – Three-dimensional Street Form CD1 – Context and Character CD2 – Design Quality, Character and Growth CD7 – Tall Buildings CD14 – Views

Listed building	CL4 – Heritage Assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology	CD4 – Designated Heritage Assets
Living conditions	CL5 – Living Conditions	CD8 – Living Conditions
Transport	CT1 – Improving alternatives to car use CR7 – Servicing	T5 – Land Use and Transport T6 – Active Travel T8 – Car Parking T9 – Servicing

These documents can be read online at:

Local Plan 2019:

<https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan>

- 3.2 The Council started a New Local Plan Review (“NLPR”) and consultation on Publication Policies (Regulation 19) closed on 22 December 2022. The Council submitted the NLPR for examination (Regulation 22) on 8 February 2023. Examination hearings were held in June and July 2023. The Council received a Post Hearings letter from the Inspector requesting the Council prepare a schedule of Main Modifications and the public consultation on these ended on 12 March 2024. The representations received are being considered by the Inspector. The final stage of the examination is for the Council to receive the Inspector’s report but there is no published date for this. The Council hopes to adopt the Plan in May/June 2024, but this depends on when we receive the Inspector’s report and may change.
- 3.3 The statutory starting point for determining this proposal remains the adopted policies in the development plan, including the RBKC Local Plan 2019, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, paragraph 47 of the National Planning Policy Framework, and paragraph 001 of the National Planning Practice Guidance on Plan-making. Paragraph 48 of the NPPF outlines the weight local authorities may give to relevant policies in emerging plans. The Council hopes to adopt the Plan in May/June 2024, but this depends on when we receive the Inspector’s report and may change. The emerging policies in the NLPR are a material consideration afforded moderate weight at this stage however, where specific emerging policies are of particular relevance to the assessment, individual weightings have been given and expressed.

4. Evaluation

4.1 The decisive issues are:

- i. Whether the proposals would have an acceptable impact on views into and out of the Royal Borough and on neighbouring conservation areas;
- ii Whether the proposals would safeguard the setting of the listed building within the Royal Borough;

- iii. Whether the proposals would have an acceptable impact on neighbouring living conditions of nearby residents in the Royal Borough; and
- iv. Whether the proposals would have an acceptable impact on transport within the Royal Borough.

Character and appearance and safeguarding the setting of the listed building

- 4.2 Local Plan Policy CL1 requires development to respect the existing context, character, and appearance of the area. Local Plan Policy CL2 seeks the highest architectural and urban design quality.
- 4.3 The site is located on the eastern juncture between Battersea Bridge Road and Battersea Bridge on the south bank of the river. The existing part six, part five storey building features a set back from the river Thames to accommodate the Thames path and sits in an area of development neatly sandwiched between the Albert and Battersea Bridges. The bridges act to visually confine built form from the perspective of the river and the associated road networks on both the northern and southern side of the river.
- 4.4 Local Plan Policy CL12 requires new buildings to respect the setting of the borough's valued townscapes and landscapes through appropriate building heights. Local Plan Policy CL11 requires all development to protect and enhance views, vistas, gaps and skyline that contribute to the character and quality of the area.
- 4.5 The application site's location places it within the setting of both the Thames and Cheyne Conservation Areas in a prominent riverside location. These conservation areas are located within RBKC and extend from the centre of the river, adjacent to Wandsworth, and to the north- east/west of the river embankment respectively.
- 4.6 Any building located on the site would form part of the setting of both conservation areas, listed structures of the bridges (Grade II) and the Chelsea Embankment (Grade II), and listed residential and community buildings. Local Plan Policy CL4 also requires the special and historic interest of listed buildings are preserved by new development.
- 4.7 Both conservation area appraisals note the important role the Thames plays in creating an open and special environment for the public, and the associated role the siting and design of the buildings and structures, contained therein, have to the overall character and appearance of the conservation areas.
- 4.8 The Thames Conservation Area Appraisal notes that:
 - 'There is an open character to the conservation area that comes from its position on the river. It also comes from the open character of the embankment structure that forms a barrier between the river and the houses of Chelsea, thus preventing built form appearing at the rivers edge'.
- 4.9 Cheyne Conservation Area Appraisal identifies that:

‘The river Thames has an important relationship with the area, offering views across it on both sides as well as from the bridges’.

- 4.10 The northern and southern banks of the river have clear and distinct relationship which encourage high quality public realm. The development to both the south and north address the river which forms the setting of these buildings. The Albert and Battersea Bridges focus this visual and physical relationship, which allows connection between not just the built form and the river, but also the connections between RBKC to the north and Wandsworth to the south. The prevailing character between these bridges is the sense of openness established by the many parks, gardens, low rise height, and setbacks from the river frontage.
- 4.11 To the east of the site, on south bank, the Battersea Park Conservation Area extends to the east of the Albert Bridge. The park establishes the beginning of low-density open development to this section of the river. The Thames Conservation Area encompasses RBKC’s entire southern boundary of the river Thames. The conservation area extends from the City of Westminster in the east, to the London Borough of Hammersmith and Fulham in the west and extends to the centre of the river and the boundary with the London Borough of Wandsworth.
- 4.12 The Thames Conservation Area appraisal identifies that:
- ‘To the southeastern boundary (of the conservation area) is the extensive riverside frontage of Battersea Park. The trees of the park mirror the riverside plane trees within the Thames Conservation Area, and this reinforces the prevailing character of the conservation area between Chelsea and Albert Bridges of a lush green river frontage’.
- 4.13 The trajectory of development clearly reflects the open, verdant, and low-rise development featured on both the north and southern banks of the river between Chelsea and Albert Bridges. While the riverside height of development rises between the Albert and Battersea Bridge, this is a gentle increase with the highest buildings extending up to six storeys within RBKC and 11 storeys to the southern side in Wandsworth. This gradual increase in height allows the setting of the Battersea Park Conservation Area to be preserved with no dominate structures encroaching on this uniquely open space. This sense of openness is also clearly reflected to the northern side of the river, within RBKC, by Chelsea Embankment Gardens and the Royal Hospital Gardens forming a strong visual relationship to both sides of the river.
- 4.14 The proposed introduction of a building totalling 33 storeys would represent a clear and distinct departure from the prevailing buildings heights along this section of the river. The introduction of a 33-storey building would dominate the surrounding built form and interrupt the low rise, open, and verdant character established on both the northern and southern sides of the river between the Chelsea, Albert, and Battersea Bridges. The height of the building and its associated width would form a prominent feature of the setting of both conservation areas which would be alien to the established character and special features which distinguish these areas.

- 4.15 Local Plan Policy CL3 criterion (a) requires development to preserve or enhance the character or appearance of the conservation area and protect the special architectural or historic interest of the area and its setting. The sharp juxtaposition in height, in a dominate location on the river frontage, would fail to preserve the identified characteristics of the associated conservation area including the sense of openness, gentle density, and high urban quality. The height and associated mass would detract from the setting of the associated conservation areas drawing focus from an area of relative relief from built form along the Thames riverbank extending through London.
- 4.16 The introduction of height along this section of the Thames can only be observed to the west of the Battersea bridge and the application site, which has a wider industrial character. The World's End Estate, within RBKC, and the Montevetro building within Wandsworth, are set away from the Battersea Bridge on its western side and stand between 20 – 21 storeys. These building establish the gateway to taller built form with an increased sense of density, bulk, and massing. These buildings in of themselves sit lower than the proposed 33 storey building which would interrupt the existing hierarchy of development along the river stretch between Chelsea and Battersea Bridges.
- 4.17 The overall height of the Worlds End Estate and the Montevetro building in association with the siting to the west of the Battersea bridge demonstrate the incongruous nature of the height proposed. The building would represent a departure from the established rhythm and trajectory of height and design along this section of the river Thames and would fail to comply with Local Plan (2019) policy CL12 and CL 11.
- 4.18 Local Plan Policy CR2 requires that where development would make significant change to the form of the existing streets. Criterion (b) requires that the ratio of building height to street width to give a coherent and comfortable scale to the street.
- 4.19 The width of Chealse Embankment and set back of its associated, and primarily residential, built form adds to the open character of the area. Similarly, or although different in regard to the existing massing and set back, the buildings to the southern side of the river accommodate the Thames path. This path way reflects the public realm on Chealse Embankment providing a high quality public realm adjacent to the river side resulting in a unique public environment.
- 4.20 The proposed introduction of a 33-storey building would clearly represent an overly assertive structure to this area of open public realm and fail to reflect the wider aims of Local Plan Policy CR2. The use of the area is unbound by administrative boundaries and the connection afforded by the bridges to the areas of open space creates a unique link between these public areas. The relationship these two walkways currently afford would be weakened by the introduction of a conspicuous and pronounced building in this environment/context.
- 4.21 The proposed development by virtue of its siting, height, and associated mass would harm the open character of the associated conservation areas. Further, the development would disrupt the established trajectory of height which increases only

to the west of Battersea Bridge. The development would fail to comply with Local Plan Policies CL1, CL2, CL3, CL11, CL12, and CR2 of the Local Plan 2019.

Living conditions

- 4.22 Local Plan Policy CL5 requires that development ensures good living conditions for occupants of new, existing, and neighbouring buildings. The development should consider the prevailing characteristics of the area, ensure good standards of daylight/sunlight, visual privacy, and ensure no harmful increase in enclosure. Development should also seek to ensure reasonable enjoyment of buildings, gardens and other spaces due to increased traffic, noise, disturbance etc.
- 4.23 The proposed development would be located to the southern side of the river Thames and as such separated from residential properties within RBKC by the river, Thames footpath, and Chelsea Embankment. Despite the visual overbearing nature of the development height, the separation would still allow adequate outlook, light, and privacy to those properties within RBKC.
- 4.24 Once in situ it is likely given the separation and use of the building that the development would ensure the enjoyment of residential dwellings would be maintained. No objection to the development on the grounds of impact to residential amenity within the bounds of RBKC administrative boundaries are raised in accordance with the remits of Local Plan Policy CL5. However, concerns as to the microclimate of the Thames Path and residential properties adjacent to the site are noted, due to the proposed height and mass, within Wandsworth.

Transport

- 4.25 Local Plan Policy CR7 requires servicing facilities to be well designed and built to accommodate the demands of a new development. Local Plan Policy CT1 states that the council will ensure that there are better alternatives to car use by making it easier and more attractive to walk, cycle, and use public transport and by managing traffic congestion and the supply of car parking.
- 4.26 The proposed development would accommodate a residential led (142 residential units), mixed use development including office, restaurant, and community uses. Battersea Bridge Road is part of the Transport for London Road Network for which Transport for London are the highway authority. The Battersea Bridge Road feeds into and out of RBKC via the Battersea Bridge.
- 4.27 The application site is located approximately 130 meters from the borough boundary at the mid-point of the bridge. The site has a PTAL score of 3. The proposal would include a total of 18 car parking spaces, 291 cycle spaces. The vehicular access and servicing would occur to the rear of the development as per the existing arrangement.
- 4.28 The proposed levels of vehicular and cycle parking would be consistent with the Local and London Plan in encouraging sustainable methods of transport. The site location in combination with the cycle parking, and limited vehicle parking provided is unlikely to result in a significant impact to RBKC's transport network once the development is in situ.

- 4.29 During the construction phase, the proposal indicates the inbound access route to a proposed pit lane on Battersea Bridge Road would pass through RBKC. This route would accommodate up to 19 construction vehicles a day. It is noted with concern that a construction traffic route is not specified. It is likely that vehicles routing towards the site would use the Earl's Court one way system and potentially the King's Road/Beaufort Street route. Vehicles would then likely depart southward away from RBKC.
- 4.30 Given the levels of vehicles which would utilise RBKC road network, to facilitate the construction phase, it is considered further details of the final Construction Logistics Plan should be provided. The proposal would utilise key transport routes within RBKC and the impact to the road network should be considered in full in consultation with RBKC.

Issues and balancing

- 4.31 The proposals would conflict with the policies in the development plan for the Royal Borough in terms of impact to the setting of the Thames and Cheyne Conservation Areas, associated listed structures, and the character and appearance of the area. The development has also failed to comprehensively address the Traffic Construction Impact of the development. The proposal would fail to comply with Local Plan Policies, CL1, CL2, CL3, CL4, CL11, CL12, CR2, CT1.

5. Consultations carried out

- 5.1 No notifications have been carried out by this Borough.

6. Recommendation

- 6.1 Raise Objections.