

HERITAGE STATEMENT OF COMMON GROUND (INCLUDING MATTERS NOT AGREED)

BETWEEN

THE APPELLANT, **PROMONTORIA BATTERSEA LIMITED**

AND

THE LONDON BOROUGH OF WANDSWORTH ('THE PARTIES')

IN RESPECT OF THE APPEAL AGAINST THE LONDON BOROUGH OF WANDSWORTH TO REFUSE PLANNING PERMISSION FOR THE DEVELOPMENT OF:

1 BATTERSEA BRIDGE, LONDON, SW11 2BZ

LOCAL PLANNING AUTHORITY REF: 2024/1322

DESCRIPTION OF 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”

APPELLANT

Promontoria Battersea Limited

LOCAL PLANNING AUTHORITY

The London Borough of Wandsworth ('LBW')

INTRODUCTION

1. The Parties agreed a Statement of Common Ground (“SoCG”).
2. In the Case Management Conference held on 26th January 2026 the Inspector requested a subject-specific Heritage Statement of Common Ground be prepared for exchange.
3. This Heritage Statement of Common Ground (“HSoCG”) is prepared further to that statement and seeks to narrow the issues between the parties to assist the Inspector.

AREAS OF AGREEMENT

4. The parties agree the relevant Development Plan Policies comprise:

London Plan (Adopted 2021)

- a. Policy D1 London’s Form, Character and Capacity for Growth
- b. Policy D3 Optimising Site Capacity through the Design-Led Approach
- c. Policy D4 Delivering Good Design
- d. Policy D9 Tall Buildings
- e. Policy HC1 Heritage Conservation and Growth

Wandsworth’s Local Plan (Adopted July 2023)

- a. Policy LP1 The Design-Led Approach
- b. Policy LP3 Historic Environment
- c. Policy LP4 Tall and Mid-rise Buildings

5. The parties agree the relevant NPPF Policies comprise:

National Planning Policy Framework (NPPF) 2024

Chapter 16 (Conserving and enhancing the historic environment)

6. The parties agree of relevance are the definitions of ‘setting’ as defined in the NPPF Glossary and PPG Summary, reproduced below:

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

THE APPROACH TO SETTING ASSESSMENT

7. The parties agree the following documents are relevant to the assessment of the effect of the Proposed Development on heritage assets (albeit the parties agree that this list is not exhaustive):
 - a. Historic England Good Practice Advice Note 2: Managing Significance in Decision-Taking in the Historic Environment, 2015.

- b. Historic England Good Practice Advice Note 3: The Setting of Heritage Assets, 2017.
 - c. Historic England Tall Buildings Historic England Advice Note 4, 2022.
 - d. The Parties will rely in evidence on the above documents which are accepted best practice. Mr Eley will also make refer to the Planning Practice Note: Heritage Impact Assessments and the setting of heritage assets (2nd Edition, 2026) published by the GLA.
8. The Parties will set out the heritage significance of the relevant heritage assets in their Proofs and the contribution of elements of setting to that significance.
9. The parties agree that an understanding of the heritage significance (and setting's contribution to that) of the relevant heritage assets can be assisted by the following documents:
- a. Relevant Historic England list entry descriptions for buildings identified as being harmed.
 - b. Relevant Historic England schedule entries for Registered Parks and Gardens
 - c. London Borough of Wandsworth, Westbridge Road Conservation Area Appraisal and Management Strategy, 2008
 - d. London Borough of Wandsworth, Battersea Park Conservation Area Appraisal and Management Strategy, 2014
 - e. London Borough of Wandsworth, Battersea Park: 10 Year Green Flag Management and Maintenance Plan, 2016
 - f. London Borough of Wandsworth, Three Sisters Conservation Area Appraisal & Management Strategy
 - g. Royal Borough of Kensington and Chelsea, Royal Hospital Conservation Area Appraisal, 2016.
 - h. Royal Borough of Kensington and Chelsea, Thames Conservation Area Appraisal, 2020.
 - i. Royal Borough of Kensington and Chelsea, Chelsea Park Carlyle Conservation Area Appraisal, 2016.
 - j. Royal Borough of Kensington and Chelsea, Cheyne Conservation Area Appraisal, 2017.
 - k. Royal Borough of Kensington and Chelsea, The Boltons Conservation Area Appraisal, 2015.
 - l. The HTVIA for planning submission prepared by the Appellant, March 2024
 - m. The Committee Report, paragraphs 2.22-2.55
10. The parties agree that setting is not an asset. The parties likewise agree that avoiding harm to the significance of a designated heritage asset is a matter of considerable importance and weight.
11. The relevant statutory provision for listed buildings comprises s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF (paragraph 212) in relation to other designated asses at issue (Conservation Areas and Registered Parks and Gardens).
12. The NPPF deems significance to derive not only from a heritage assets physical presence, but also from its setting. Setting is important for what it contributes to significance, or an appreciation of an asset's significance.
13. As proposed, the Parties agree that height and scale of the development will create a setting interaction with a number of heritage assets and the relevant ones are identified in the table which comprises pages 19 to 21 in the Council's Statement of Case and reproduced below.
14. Dr Miele's evidence will focus on the following assets:
- a. Church of St Mary, Battersea (Grade I)
 - b. Chelsea Royal Hospital (Grade I, Grade II RPG and Conservation Area)
 - c. Albert Bridge (Grade II*)

- d. Battersea Bridge (Grade II)
 - e. Battersea Park (Grade II* RPG)
 - f. Westbridge Road Conservation Area
 - g. Cheyne Conservation Area
15. Dr Miele will consider the other assets in summary reflecting the nature and extent of the potential impacts and taking a proportionate approach to assessment. These comprise:
- a. Chelsea Park / Carlyle Conservation Area
 - b. Hyde Park (Grade I RPG)
 - c. The Three Sisters Conservation Area.
16. Mr Eley's evidence will address those designated and non-designated heritage assets found to be harmed in the Officer's Report to Committee. It will assess significance, the relative contribution of elements of setting and the impacts on significance (including any cumulative impacts). It shall be proportionate to the asset's importance and no more than sufficient to understand the potential impacts on significance in accordance with the NPPF (paragraph 207).
17. The comparative positions of the parties in respect of whether there are any harms and the precise degree of any less than substantial harms is set out in the table. This table also includes Historic England's and the Greater London Authority's (GLA) assessment for completeness.
18. The table agrees shorter form summaries of significance. The Parties may expand on these in their respective Proofs of Evidence.

MAIN ASSETS UNDER CONSIDERATION							
ASSET	STATEMENT OF SIGNIFICANCE / HERITAGE VALUE AGREED BETWEEN THE PARTIES	VIEWS PROVIDED IN THE BHTVIA	CONSULTEE RESPONSE FROM HISTORIC ENGLAND (19.06.24)	GLA POSITION ON HARM	APPELLANT'S POSITION ON HARM	COUNCIL'S POSITION ON HARM	RULE 6 PARTY POSITION ON HARM
Westminster World Heritage Site	Not assessed within HTVIA – because there is agreed to be no impact on it.	Appendix 4 of HTVIA, non-verified view fig. 11.2, 11.3, 11.4, 11.13		No harm	No harm	No harm	No harm
Battersea Bridge, Grade II	The heritage value of Battersea Bridge is derives from its architectural interest as a large surviving and intact example of a cast iron arched bridge with Victorian decorative detailing. Its historic interest also contributes towards its high heritage value, as the bridge continues the historic provision access from Battersea to Chelsea that had been operative at this point of the Thames from at least 1550, first via ferry and then a wooden footbridge.	7, 10, 11, 16, 18, 19, 21	<i>Perhaps the most noticeable juxtaposition in scale illustrated in the BHTVIA would be from Cheyne Walk towards Battersea Bridge (Viewpoint 11) where the tall building would rise significantly above the riverfront townscape. As set out above, the significance of Battersea Bridge largely relates to Bazalgette's design and innovation, which would continue to be appreciated despite the imposing nature of the tall building. Taking this into account, as well as the low-lying positioning of the bridge, and its mixed townscape setting, we consider the harm caused to the listed bridge to be low, despite the significant visual impact.</i>	Less than substantial – low to middle.	No harm	Middle level of LTSH	Middle level of LTSH
Albert Bridge, Grade II*	The heritage value of Albert Bridge is comprised of its architectural merit, as an elegant bridge with Gothic embellishment including ornate eight-point star cast iron towers, built to an innovative design combining elements of suspension and cable-stayed bridge construction. It is noted within the Battersea Park Conservation Area Appraisal for being “an extremely delicate, attractive and original structure”. The original tollbooth structures, which stand either side of	4, 10, 12, 13, 16	<i>The Albert Bridge is more sensitive to development within its setting due the high architectural interest of its suspension and cable-stayed construction which can be appreciated in river views. In Viewpoint 4 (Cadogan Pier), the proposed tall building would visually distract from these</i>	Less than substantial – low to middle.	Low level of LTSH	Middle level of LTSH	Middle level of LTSH

	the road at each end of the bridge, also remain in good condition and add to the heritage value of the bridge. Albert Bridge also derives heritage value from its historical interest, primarily in providing a significant new accessway across the River Thames as part of major Victorian improvements to the city and framing Battersea Park, and Chelsea Embankment. The Park was created many years before the Embankments. The bridge and the Embankment are more or less contemporary projects.		<i>elements of significance by competing with the towers and diminishing its overall architectural elegance. We recognise that existing tall building developments along the Chelsea Embankment are visible, and that the architectural interest of the bridge is appreciated in the round. Nonetheless, we consider that some harm of a relatively low level would result on the basis of this assessment.</i>				
Hyde Park, Registered Park and Garden, Grade I and the Royal Parks Conservation Area	The significance of the Royal Parks includes Hyde Park, St James Park, Green Park, Buckingham Palace Gardens and Kensington Gardens. The Parks are a product of the picturesque landscape tradition of the mid 18th Century to mid 19th Century; are dominated by their lakes, wooded paths, avenues and informal planting.	Appendix 4 of HTVIA, non-verified view fig. 11.10, 11.11, 11.12	Not commented upon.	Less than substantial – very low.	No harm	Low level of LTSH	Low level of LTSH
Church of St Mary and churchyard wall and gates, listed Grade I	The church's heritage value is derived from its historic interest, both as it continues the tradition of Christian worship on this Site since 800a.d., having replaced the site of a previous Saxon church, and also for its associative value with important cultural figures such as William Blake, who was married here, and JMW Turner, who often painted views of the Thames from within the church. It also holds architectural interest as a representative example of Georgian Neoclassicism employed for church design. St Mary's Church was built at a time when Battersea village was a desirable country retreat from the busy city of London and had become the location for many merchants to establish their country houses.	18, 19	<i>The assessed views of the Battersea Square Conservation Area suggest that the proposed development would not be visually prominent from Battersea Square (Viewpoint 25). In Viewpoint 18 of St Mary's Church, views of the church and its riverside setting have been heavily compromised by post-war and more recent development. Despite this being the historic heart of Battersea, it appears unlikely that these proposals would cause harm to the conservation area or its component listed buildings.</i>	Less than substantial – low to middle.	No harm	Low level of LTSH	Middle level of LTSH
Royal Hospital Chelsea and associated buildings, listed Grade I and the	The CA is characterised by the two large complexes of the Royal Hospital and the Duke of York's headquarters and provides a 'welcoming break from the continual noise and bustle of the two	1, 2, 3, 12, 13, 23 c.670m from Site at	<i>Across the Thames, the tall building would be visible from the grounds of the Royal Chelsea Hospital, where the formal composition of both</i>	Less than substantial – low to middle.	No harm	Low level of LTSH	Low level of LTSH

<p>Chelsea Royal Hospital Conservation Area (RBKC) and the associated Chelsea Physic Garden, a Registered Park and Garden, Grade II</p>	<p>thoroughfares of the King's Road and Chelsea Embankment' (CAA).</p> <p>Beyond the two large building complexes of the Hospital and Duke of York's Headquarters the area is 'made up of more modest terraced housing and individual buildings that form attractive and characterful streets of Georgian and Victorian date'. The architecture of the area contributes strongly to the heritage value of the CA and varies in age and style, which reflects 18th and 19th changes in fashion. The majority of buildings are constructed from a limited palette of materials, predominantly London stock brick or stuccoed frontages, and therefore a sense of uniformity is maintained in the area despite variation in size, status and form of the buildings.</p> <p>The CA also includes a number of open green spaces which are important positive contributors to the area. This includes the Hospital Grounds, the grounds of the Duke of York Headquarters, the Chelsea Physic Garden and the verdant spaces in the centre of typical planned Georgian squares, such as Tedworth Square.</p> <p>The Hospital's very high heritage value is derived from its architectural value as an important example of the peak of British Baroque architecture in London and as the work of eminent architect Sir Christopher Wren. Historically, the Hospital derives heritage value as the first institution to provide for sick and injured soldiers, illustrating a shift in societal attitude towards veterans after the Restoration.</p>	<p>nearest point</p>	<p><i>Wren's hospital complex and its axial landscaping can be appreciated. Chelsea's historic townscape is visible from this location, but there is virtually no intrusion of modern development from the south grounds towards the hospital. The proposals, although seen at a distance in Viewpoints 1(Royal Hospital), 2 (Royal Hospital Road, wireline) and 23 (Royal Hospital 2, wireline), would undermine this well-preserved site of exceptional interest, and visually distract from the formality of its axial landscaping. We consider that some harm of a relatively low level would therefore be caused to both the Grade I listed Hospital and the Grade II RPG.</i></p>				
<p>Numbers 4, 5, 6 and 15 Cheyne Walk, Queens House, listed Grade II* and Swan House and Garden Corner, listed Grade II*</p>	<p>The heritage value of the receptor group derives from its architectural and historic interest. Architecturally the buildings hold interest as they are understood as a coherent area of townscape built at a similar time, yet within the individual properties there is variation on the architectural detailing. Some architectural interest is also derived from the work of a number of eminent Victorian architects on the later renovations and construction of a few properties, such as Richard Norman Shaw and</p>	<p>No views c.420m from Site at nearest point</p>	<p>Not commented upon.</p>	<p>Missing in assessment.</p>	<p>No harm</p>	<p>Low level of LTSH</p>	<p>Low to middle level of LTSH</p>

	<p>Voysey. They retain many original architectural features including Palladian windows, stucco detailing, brick corbelling and original sash windows across the properties.</p> <p>Historically, the receptor group is of interest as a central cluster of high status Georgian and Victorian development in the borough which lines the river and has an overall highly coherent character. The buildings stand as a cohesive example of 18th / 19th century genteel housing and present as good survivals of housing in Chelsea in this era.</p>						
<p>Battersea Park, Grade II* Registered Park and Garden and the associated Battersea Park Conservation Area and the listed buildings within the area</p>	<p>The CA focuses on the special character derived from the presence of Battersea Park, a purpose-built Victorian leisure park considered to be of ‘<i>outstanding landscape interest</i>’ as noted in the CAA document.</p> <p>The heritage value of the CA is derived from the relationship between the park, the surrounding urban development predominantly comprised of mansion blocks of which a number are locally listed, and the River Thames to the north, which creates an unusual and valuable riverside setting to the park.</p> <p>The main structural elements of that landscape survive in good condition. There have been some alterations made to this in the C20 through, for example, the introduction of paths, the Festival of Britain landscape and various modern structures including all weather pitches and track and field facilities.</p>	<p>4, 10, 12, 13, 14, 15, 16, 24</p> <p>c.350m from Site at nearest point</p>	<p><i>The Zone of Theoretic Visibility maps (ZTV, p35-37) indicate that the proposed development would likely be visible from much of Battersea Park. In the assessed views, the proposed tall building would be most prominent from Viewpoint 15 (Battersea Park West, wireline). From here, the proposed building would be seen above the tree canopy where other modern development is just visible to the left. Although this would be significant visual impact, this is not a particularly sensitive viewpoint in our opinion. However, in our pre-application advice, we recommended that an additional viewpoint should be added along the diagonal tree-lined axis directly in front of the timber shelter. From this location, the Victorian designed landscaping and enclosed treelined character of Battersea Park can be better appreciated.</i></p> <p><i>This assessment has not been prepared in the BHTVIA. However, having tested these</i></p>	<p>Less than substantial – low to middle.</p>	<p>No harm</p>	<p>Middle level of LTSH</p>	<p>Middle level of LTSH</p>

			<p><i>views using 3D modelling software, it is likely that the proposed tall building would rise above the tree canopy in views along the north-west diagonal axis. It is therefore likely that some low level of harm would result from these impacts due to the encroachment of the tall building on the well-preserved and enclosed Victorian character of the Grade II* RPG.</i></p>				
<p>Westbridge Road Conservation Area (LBW) and the Grade II listed buildings within the area</p>	<p>The Westbridge Road Conservation Area was first designated in September 1984 and focuses on the special Victorian character of the area, comprised of a compact townscape of good quality terraces, semi-detached villas and some early Victorian shops with original shopfronts. The group of buildings at the heart of this conservation area are some of the earliest surviving in Battersea, dating from the early Victorian period, and a significant amount of this first scheme of development in the area remains intact.</p> <p>The receptor's heritage value is derived from its as an enclave of Victorian development. This, combined with the CA's clearly delineated boundaries due to the presence of surrounding roads, clearly demonstrates the architectural and historic interest which supports the designation. to contextualise this rapid period of development in the local area.</p> <p>2-4 Westbridge Road is one of the earlier Victorian survivals, of 1845 - comprising a striking pair of Gothic Revival homes, some of the most distinctive in the Borough – with convincing Medieval Gothic detailing complete with traceried windows and gables containing figurative niches, and all faced in a knapped flint.</p>	<p>20, 21, 26</p> <p>c.115m from Site at nearest point</p>	<p><i>From the Westbridge Road Conservation Area the proposed tall building would be seen rising just behind the Victorian townscape (Viewpoint 20, wireline) and it is likely that it would appear above the historic roofscape on the approach towards Battersea. Bridge Road. We advised at pre-application stage that visual assessment would be helpful, for example from the far-side pavement across from the Grade II listed Nos 2-4 Westbridge Road. Although a view of the listed buildings has been included in the submission (p56, Fig 5.30), no further visual assessment has been provided. Nonetheless, it is likely that the tall building would erode an appreciation of the well preserved historic townscape in kinetic views along Westbridge Road by creating a visual distraction behind its roofline. We note that the tree canopy partially screens this roofline during summer months. Taking this into account, we</i></p>	<p>Less than substantial – low level.</p>	<p>No harm</p>	<p>Middle level of LTSH</p>	<p>Middle level of LTSH</p>

			<i>consider that the impact of the proposed tall building would cause a low level of harm to the conservation area and Grade II listed buildings.</i>				
Battersea Square Conservation Area (LBW)	The conservation area focuses on the discernible elements which historically comprised the original village of Battersea; in particular the Church of St Mary, Battersea Square, Old Battersea House and the Raven Public House. Also included in the conservation area are the later Victorian clusters of development which predominantly take the form of two and three storeyed terraces The CA derives much of its heritage value from its nature as a surviving historic enclave.	17, 18, 19, 25 c.485m from Site at nearest point	<i>The assessed views of the Battersea Square Conservation Area suggest that the proposed development would not be visually prominent from Battersea Square (Viewpoint 25). In Viewpoint 18 of St Mary's Church, views of the church and its riverside setting have been heavily compromised by post-war and more recent development. Despite this being the historic heart of Battersea, it appears unlikely that these proposals would cause harm to the conservation area or its component listed buildings.</i>	No harm	No harm	No harm	No harm
Cheyne Conservation Areas (RBKC) and the multiple listed buildings within the area including Chelsea Old Church, Grade I; Crosby Hall, Grade II*; Lindsey House, Grade II* and Grade II listed houses in Cheyne Walk, Danvers Street, Paultons Square and Ropers Garden	The CA's special interest lies in its architectural and historic interest focused on the presence of numerous highly graded buildings. The CAA states that <i>"the riverside setting [...] and the high quality Georgian houses that replaced them form an area of extremely high heritage value"</i> . The CA also covers a number of planned squares and terraces of Georgian development, such as Paultons Square which sits behind the embankment and which contains attractive, uniform stuccoed terraces built as part of a speculative development. The CA is notable for its social history, having been home to a number of writers and artists.	4, 5, 6,7, 8, 10, 12, 13, 19 c.260m from Site at nearest point	<i>Finally, in views from Paultons Square (Viewpoint 6, wireline) within the Cheyne Conservation Area, the proposed development would rise significantly above the parapet line of the Grade II listed Georgian terraces facing the square. Although the proposal would be partially screened by trees in this static view, it is very likely that the development would be visible against a clear sky from other locations within the square. This visual intrusion would erode the appreciation of this high-quality and formal Georgian townscape which is a key part of the conservation area's character. We therefore</i>	Less than substantial – low to middle.	No harm	Low level of LTSH	Low to middle level of LTSH

			<i>consider that harm of a relatively low level would be caused to the conservation area, and its Grade II terraced houses on Paultons Square for the same reason.</i>				
The Boltons Conservation Area (RBKC)	<p>The CA appraisal was adopted in 2015. It highlights <i>“two architectural set pieces: The Boltons and Redcliffe Square which both focus on churches at their centre”</i>, noting that the CA <i>“is fairly lushly planted with mature trees featuring quite strongly in some streets as well as the two ‘squares’”</i>.</p> <p>The Boltons lies in the northern part of the CA. It is surrounded by grade II listed, mid-19th century large stucco semidetached villas. The garden at the centre of the square is a Grade II listed registered park and garden The CAA summarises that the CA has <i>“an urban form that is highly legible and exhibits a hierarchy from luxurious spaciousness around the semi-detached villas, to the more space-conscious terraces, with the mews (having no gardens or pavements) representing the most tightly packed areas.”</i></p>	<p>8</p> <p>c.950m from Site at nearest point</p>	Not commented upon.	Less than substantial – low.	No harm	Low level of LTSH	Low level of LTSH
Chelsea Park/Carlyle Conservation Area (RBKC)	<p>The heritage value of the CA is noted within the CAA as principally comprising <i>‘groups of generally modest residential properties that form an oasis of pleasant family homes and studios between the bustle and activity of Fulham Road and King’s Road.’</i></p> <p>The building typology is a mix of mews, terrace, semi-detached and individually designed buildings which form the heritage value of the CA. The majority of the area is terraced, with instances of large footprint, detached buildings which predominately function as hospital accommodation. Of particular note is the Royal Brompton Hospital, Royal Marsden Hospital and Nurses Accommodation Block and the Church of St Andrew (Grade II). These are noted as <i>‘important historic buildings both in their own right and in relation to the historic and</i></p>	<p>5, 8</p> <p>c.1600m from Site at nearest point</p>	Not commented upon.	Less than substantial – low.	No harm	Low level of LTSH	Low level of LTSH

	<i>architectural character of the conservation area as a whole' (CAA).</i>						
Brompton Cemetery Conservation Area (RBKC) and the associated Brompton Cemetery, a Registered Park and Garden, Grade I and associated cemetery buildings, listed Grade II*	<p>The heritage value of Brompton Cemetery is derived from its historic interest in being one of the earliest modern cemeteries and part of the seven suburban cemeteries constructed in the first half of the 19th century around London.</p> <p>Architecturally, it derives heritage value as a monumental and formal design of a cemetery by renowned Victorian architect Benjamin Baud, who also designed the chapel and arcade at the centre of the cemetery.</p> <p>The effect of the cemetery is highlighted by the listing description as <i>“an exceptional ensemble of buildings within the landscape to evoke great architectural drama”</i>. The cemetery contains numerous listed and scheduled monuments, many in memory of important historical figures (HTVIA, paragraphs 5.117-5.118)</p>	<p>9</p> <p>c.1.2km from Site at nearest point</p>	Not commented upon.	No harm	No harm	No harm	No harm
Three Sisters Conservation Area (LBW)	<p>The conservation area focuses on a small enclave of planned housing spanning over 5 streets and dating from the 1860s and 1870s. Its heritage value is derived from the fact it is a distinct and unusual example of planned development in this period, with properties principally designed as semi-detached villas set back from the road with generous front gardens. Architecturally, the Victorian housing within the CA has a distinctive rhythm of hipped roofs and varied architectural detailing. The trees and greenery within the CA are also a positive contributor to its character.</p>	<p>No views</p> <p>c.530m from Site at nearest point</p>	Not commented upon.	Not possible to assess.	No harm	Low level of LTSH	Low level of LTSH
Thames Conservation Area (RBKC)	<p>The Thames Conservation Area spans the whole of the of the RBKC riparian frontage, its immediate embankments and gardens, and those relevant sections of Battersea, Albert and Chelsea Bridges. It incorporates the Chelsea Embankment, whose carriageway covers the Victorian sewers below, with its Victorian granite river walls, balustrades, iron lamp standards,</p>	<p>4, 10, 11, 12, 13, 18, 19</p> <p>c.150m from Site at nearest point</p>	Not commented upon.	Less than substantial – low to middle.	No harm	Middle level of LTSH	Middle level of LTSH

	<p>avenues of mature trees and informal gardens and nationally important figurative sculptures. Much of the intrinsic heritage value of the CA derived from the presence of marine infrastructure including Battersea, Albert and Chelsea bridges linking the CA directly with the southern riverside. The river itself is a focal point and has a relationship with Battersea Park.</p>						
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19. Mr Eley will also provide proportionate evidence on the following assets, one listed and the rest non-designated assets:
- a. Church of St Andrew (Grade II)
 - b. 10-14, 24-52 Westbridge Road.
 - c. 52-68 Battersea Bridge Road.
 - d. 11-35, 61-71 Battersea Church Road.
20. Dr Miele has assessed these heritage assets in his evidence on their attendant conservation areas.

PARTIES' POSITIONS REGARDING THE DEGREE OF HARM TO HERITAGE ASSETS

21. The parties agree that any harms to designated heritage assets would fall into the less than substantial category as defined by paragraph 212 of the NPPF.



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