

Proof of Evidence

Character and Appearance + Heritage

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

THE GLASSMILL, 1 BATTERSEA BRIDGE, LONDON, SW11 3BZ

LPA REF: 2024/1322

PINS REF: 6002127

February 2026

On behalf of

The London Borough of Wandsworth

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1.) Qualifications and Experience:

- 1.1 I am Ben Eley. I am a Chartered member of the Royal Town Planning Institute (MRTPI). I have an outstanding application to reinstate full membership of the Institute of Historic Building Conservation (IHBC) (originally obtained Full Membership in c.2013, but allowed to lapse). I have a first-class honours degree in Town Planning, specialising in urban design, and a Master of Science in Historic Conservation (with Merit) from the Universities of Newcastle and Oxford Brookes/Oxford, respectively. I've been interested in townscape character since my undergraduate dissertation on the topic was recommended for publication.
- 1.2 Since I have over 15 years of experience in the private and public sectors in London. This experience spans development management, conservation and urban design, both as decision-maker in the exercise of delegated authority, joint case officer and advisor. This relates to the full suite of development applications on sensitive land: including highly significant listed buildings (such as the London Custom House (Grade I) and Smithfield Central Markets (Grade II*)), registered landscapes, conservation areas, scheduled monuments, metropolitan open land and the Thames Policy Area. My project experience ranges from a new Museum of London and reserved matters in relation to the major Ram Brewery redevelopment in Wandsworth, to EIA development, including the world's longest public art commission on the Thames - the Illuminated River.
- 1.3 Of relevance, I have extensive experience pertaining to tall and very tall buildings from 8 years at the City of London Corporation, including at a senior level, as Interim Head of Design and Assistant Director (Design). In this role, I advised on some of London's tallest buildings including its (joint) tallest (1 Undershaft). I conceived and for a time led the development of the City of London's tall building strategy set to underpin its City Plan 2040. I am not opposed to the right tall building, in the right place.
- 1.4 In my present role as Senior Conservation and Urban Design Officer I coordinate the Design Review Panels of the London Boroughs of Wandsworth and Richmond upon Thames. These provide a comprehensive design review service for the most strategic

and/or sensitive development. I also carry a mixed caseload across what is London's longest riparian frontage.

- 1.5 I have been resident in SW11 for nearly a decade and understand its spatial qualities borne out of lived experience. I am also an elected member of the Outdoor Writers and Photographers Guild and a freelance writer with a focus on the outdoors and culture.

2.) Scope of and Approach to Main Evidence

Approach – Character & Heritage:

- 2.1 Main issue a), the effect of the proposal on the character and appearance of the area, is the focus on this Proof, as per the Council’s Reason for Refusal 1. That is, for completeness:

The proposal, by reason of its excessive height and scale, within an established local spatial character that is predominantly low-rise, while also being located within a low-rise policy zone, would represent an unacceptable and incongruous transformative change within the location that would significantly harm the spatial character of the same location. The significant harm identified has not been outweighed by material considerations that indicate otherwise. As such, the proposal is considered to be contrary to the NPPF 2024, Policy D9 (Tall buildings) of the London Plan 2021 and Policies PM9 (Riverside) and LP4 (Tall and Mid-rise Buildings) of the Wandsworth Local Plan 2023.

- 2.2 Main issue b.), the effect on the significance of heritage assets, is given separate consideration. Heritage matters are related to, but also have a separate dimension from, the impacts on spatial character. To reflect this, I address heritage impacts separately, tabulated for ease of reference, in Appendix 1 (Heritage Impacts Table). This impact assessment follows the common ground and established approach to assessing the impact on heritage significance via setting. The balancing of impacts on the significance of heritage assets and any public benefits is undertaken by the Council’s planning witness and, as such, does not form part of my evidence. I do however comment later in this proof on the Appellant’s asserted heritage benefits.

- 2.3 With respect to the relationship between impact on spatial character and the effect on heritage assets, an impact on heritage significance is not the same as the impact on the spatial character. The latter is a composite of aspects which make up local character,

identity and distinctiveness: inclusive of townscape and landscape. It incorporates a general or prevailing pattern of land and built form, including an areas morphology, compositions, visual relationships, hierarchy, skyline and sense of openness and enclosure. These factors find form in an urban grain, heights, forms, scales, expressions and an overall appearance. This is also influenced by how an area is occupied, its uses and activities which affect a sense of scale, texture and interest. This has basis and recognition in NPPF para 135 (c) (CD4.01) and the ten characteristics of the National Design Guide (2021) (CD4.03). The historic environment contributes to local spatial character, but that character it is not limited to it. Impacts on heritage significance are distinct. The architectural or historic value of a listed building or a conservation area is often more innate or intrinsic to its fabric and form. This is different to the extent it draws on wider setting relationships.

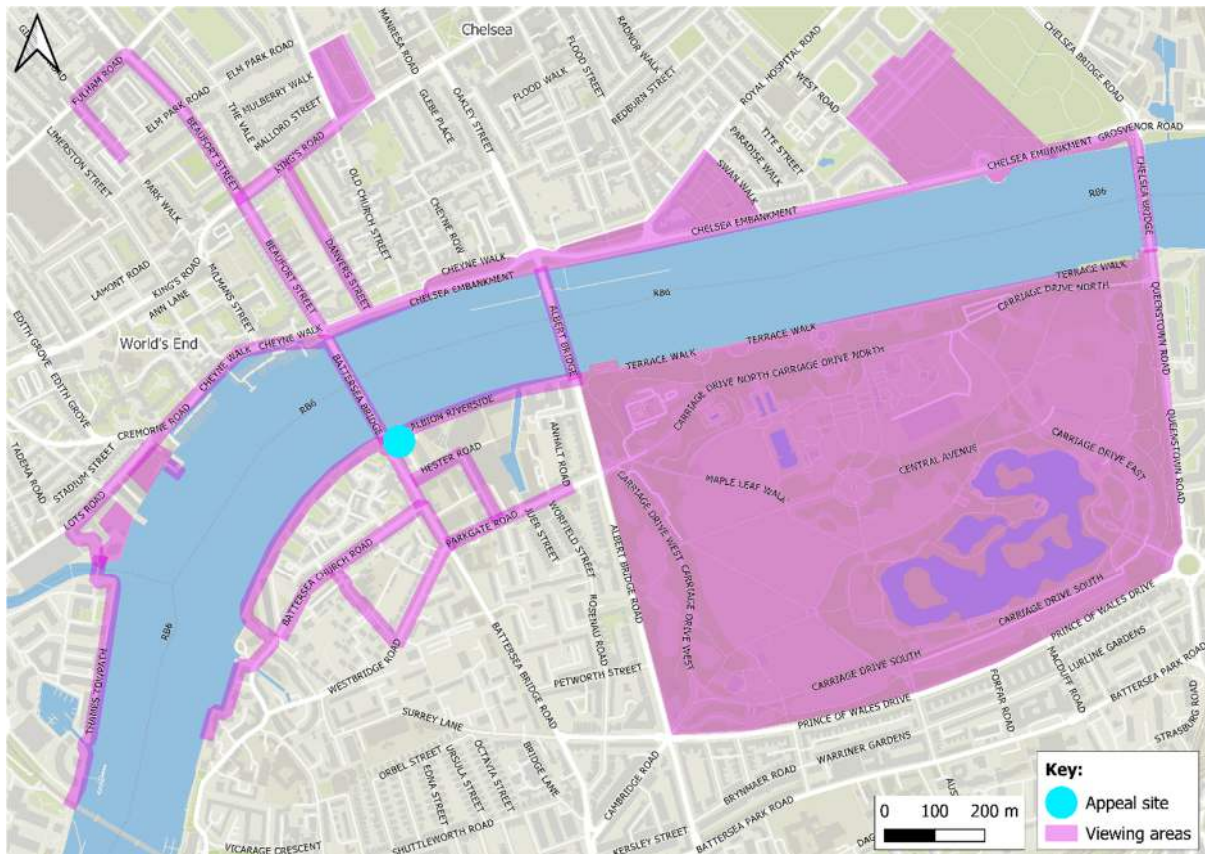
- 2.4 This difference the NPPF recognises, such as at paragraph 203, which seeks to ‘draw on the contribution made by the historic environment to the character of a place’. Historic England’s GPA 3 (The Setting of Heritage Assets) (CD4.13) is explicit: ‘setting is different from the concepts of curtilage, character and context’ (para 7).
- 2.5 In terms of heritage assets, individual assets can, in addition to their intrinsic significance, draw to an extent on elements of spatial character for significance. **Appendix 1** sets out the extent to which elements of setting contribute to significance on an asset-by-asset basis – which can, of course, vary. ‘Less than substantial’ harm to the significance of a heritage asset does not equate to a lower than substantial harm to an area’s spatial character. This is important foundational context to my Proof of Evidence.

Scope of Evidence:

- 2.6 My assessment adopts a geographical, sequential and kinetic approach to assessing the spatial character impacts. An area’s spatial character is inherently dynamic and unfolding and adjusts as the visual receptor moves through an area. This is foundational to the concept of townscape, but is also explicitly recognised, for example, in Historic England’s GPA 3 ‘The Setting of Heritage Assets’ (para 10) (CD4.13) in respect to how

heritage assets are experienced. I have selected the different ‘viewing areas’ as distinct experiences form discreet routes or places, often with distinctive (if often interrelated) characters. The broad viewing areas addressed in this evidence as indicated on map at Image 1.

Image 1: Viewing areas covered in evidence.



- 2.7 Some are more passive movement corridors, others a mix movement and more static leisure where, for example, the visual receptor is encouraged to slow down or stop, to scan and absorb a wider context. I consider this to be a rationale and robust approach to understand the full impact on the spatial character of the area.
- 2.8 The text of my proof, and in particular my assessment of the experience from the sequence of spatial areas should be read alongside **Appendix 2** (Impacts – Photographs), which can also inform a site visit (accompanied or otherwise). Appendix 2 also lists material information in terms of designations and guidance. For the purpose

of the assessment, the visual impacts are grouped. First, under the ‘river corridor’, comprising riparian views on and across the River Thames, its immediate edges and bridges. This broadly conforms with areas in the Thames Policy Area and covers the Battersea and Chelsea Reaches, as set out in the Thames Strategy – Kew to Chelsea (2002) (Image 11, CD5.37).

- 2.9 Second, the ‘landside townscape’; comprising the streets, public and quasi-public spaces set back from both sides of the River Thames. References under the different viewing areas to figures refer to those images in **Appendix 2**.
- 2.10 This analysis is underpinned by Development Plan Strategic Policies D9 of the London Plan 2021 (CD5.01) and LP4 of the Wandsworth Local Plan 2023 (CD5.02), and relevant design policies contained in the NPPF. It is rooted in consideration of the Wandsworth Urban Design Study (December 2021) (‘UDS’) (CD5.16). This is evidence base of the relatively recently adopted Local Plan and its plan and design-led approach to growth.
- 2.11 Multifarious heritage impacts can also be understood in the viewing areas followed in main evidence. As discussed, these are considered standalone as part of main issue b) at **Appendix 1**. In its tabulated form my assessment follows the now well-established procedural approach of prescribing i.) heritage significance ii.) elements of setting contributing to significance iii.) any cumulative impacts and finally, iv.) the heritage impacts. To assist the Inspector, an additional section on the scope of impacts, the areas where these assets can be experienced, is included for each heritage asset. The Appellant and LPA were not able to agree these in the heritage specific statement of common ground (‘HSoCG’). The photographs in Appendix 2, where relevant, refer to the heritage assets in the view, and any relevant aspects of the various Conservation Area Appraisals.
- 2.12 I include a shorter section in this main evidence summarising those heritage impacts. This addresses issues with the Appellant’s approach to assessing significance impacts via setting. It also addresses the Appellant’s claim to heritage benefits arising – a matter of difference between the parties which the Appellant wasn’t able to agree upon in the HSoCG.
- 2.13 Finally, this Proof also addresses the matter referred to as ‘architectural quality’, but which I frame as ‘design quality’ to be inclusive of public realm. Our view is founded

in policy and supplemented by the views of other relevant independent experts: the Wandsworth Design Review Panel ('WDRP') and the Greater London Authority ('GLA'). This main evidence is included in **Appendix 3** ('Design Quality Table').

- 2.14 The Proof concludes with an assessment of the scheme against policies D9, LP4 and the NPPF. This should be considered together within the evidence of my colleague Joanna Chambers, who addresses also policy compliance. Evidence relating to the wider planning matters and the overall planning balances is dealt with by Joanna Chambers in her evidence.
- 2.15 I did not advise on this project previously and I can confirm this evidence reflects my own professional judgment. I can confirm that artificial intelligence has not been used in the preparation of this evidence.
- 2.16 In referring to the 'Appeal Scheme' I refer to the common ground description of development. Reference to the 'Appeal Site' refers to the site edged in red on the Site Location Plan.

3.) Main Issue a) – Character and Appearance

Historical Background to Character and Appearance of the Area:

- 3.1 The character of the Chelsea–Battersea reach¹, between Chelsea Bridge and Battersea Rail Bridge as defined in the Thames Strategy, is the product of successive layers of rural, aristocratic, industrial and metropolitan improvement, all centred on and structured by the breadth and openness of the River Thames.
- 3.2 During the medieval up until 18th Century, Battersea was a small agrarian settlement on the southern fringe of London, clustered around its ancient parish church of St Mary by the River on the Surrey (south) side (Image 2). Chelsea, on the north (Middlesex) bank, was likewise a distinct riverside village but benefitted from closer proximity to power at Westminster. From the 16th century onwards, it became associated with aristocratic and courtly residences set within generous riverside grounds - known as a village of palaces. Sir Thomas More's house stood near the present Roper's Garden (Appendix 1), the site of an orchard part of his estate, and adjacent to Chelsea's ancient landmark All Saints (Chelsea Old Church, Grade I, Appendix 1). Of this earlier pattern of substantial riverside houses embedded in landscaped settings, one rare survivor is Lindsay House (Grade II*, Appendix 1).
- 3.3 Two enduring institutional anchors emerged in the later 17th century. The Chelsea Physic Garden, one of the oldest of its kind in England, was founded in 1673 (Grade I, Appendix 1), established a cultivated but open riverside edge of scientific and cultural importance. Shortly thereafter, the Royal Hospital Chelsea (founded 1682, designed by the renowned Sir Christopher Wren; Grade I and Registered Park and Garden, Appendix 1), a sanctuary for infirm army veterans, was constructed as a grand Baroque composition with a processional axis approach from the Thames. Its formal grounds and low-slung frontage are a landmark which recedes back to its historic, lush riverside setting, then still very much set-apart from the Capital.
- 3.4 The first Battersea Bridge (opened 1771) physically connected these contrasting settlements and drew artists and writers to the picturesque interplay of river, industry

¹ A river reach is usually a defined stretch of river with common characteristics.

and open land (Image 3). By the late 18th and early 19th centuries, Chelsea's riverside evolved into a sequence of elegant, higher order Georgian terraces and villas, the best of which, of c.1720, can be found along Cheyne Walk (Grade II*, Appendix 1). Their restrained height and decorum (3/4 storeys), set back from the river behind planting, established an a modest urbane but scale that still defines the north bank.

Image 2: Battersea and Chelsea villages at the dramatic meander of the River Thames, c.1750, still two separate villages. Note the landmark riparian churches defining the skyline.



3.5 Battersea's development lagged behind, constrained by its poor connections and marshy floodplain. 'Battersea Fields' remained largely pastoral and market garden into the early 19th century. The major transformation came in the Victorian period. Battersea Park (opened 1858; Grade II* Registered Park and Garden, Conservation Area, Appendix 1) was created on part of the former common land, deliberately positioned to exploit expansive views across the Thames toward the Royal Hospital and Chelsea. Its

open river promenade part of a wider strategy for metropolitan-scale enhancements to the Capital's premier natural asset.

- 3.6 This was a boon to Battersea's burgeoning working class population fuelled by the arrival of the railways from the 1840s. The riverside area transformed into mixed industrial and the former fields turned over to, in some instances, to set-piece examples of model gentle-density, close-knit 2-storey working class dwellings, such as the Latchmere and Shaftsbury Estates. But some of the oldest from the 1840s is nearest the Appeal Site, between the old village and the Battersea bridge, huddling close to the old industries, rubbing humble workers cottages up against well-healed stucco villas (see Westbridge Road Conservation Area, Appendix 1).

Image 3: J M W Turner, c.1797, the spatial qualities of this river reach were not lost on Turner. The new Battersea Bridge, fashionable Chelsea houses and the old landmark Church towers are now picturesquely juxtaposed with a creeping industry.



- 3.7 A little later the Metropolitan Board of Works under Sir Joseph Bazalgette undertook the construction of the Chelsea Embankment (1870s), formalising the river edge with a tree-lined promenade built above new interceptor sewers to match in grandeur and scale Battersea Park. This engineering and civic intervention created the tree avenues and informal gardens which define the skyline of the north bank. Albert Bridge (opened 1873; Grade II*, Appendix 1), designed by Rowland Mason Ordish and later strengthened under Bazalgette, provided a decorative and deft crossing that remains a focal riparian landmark in the upstream and downstream panoramas. The present Battersea Bridge (1890; Grade II, Appendix 1) replaced the earlier dilapidated (if picturesque) timber structure, completing the rhythmic sequence of Victorian crossings that frame this reach (Chelsea Bridge was re-built interwar).
- 3.8 By the late 19th century, this stretch of the Thames embodied a distinctive juxtaposition: fine townhouses and mansion blocks nestled in formal civic embankment and parkland, and a mixture of industry and modest housing on the other. The Albert Bridge Flour Mills (1880s) and Morgan's Crucible works established an industrial riverside presence on the south bank between Albert Bridge and old St Mary's (Images 4 & 5). Opposite Battersea Bridge, alongside the big chimneys of Morgan's Crucible, the young London Country Council built a riverside fire station in an in-house red brick manner, complete with observation tower and turret (Image 6).

Image 4: riverside industrial sites between Battersea Park and St Mary's Church, c.1916.



Image 5: Thames foreshore west of (old) Battersea Bridge, c.1870, St Mary's in the distance. Brunel's former sawmills prior to absorbing into the wider Morgan's Crucible site.



Image 6: Old LCC Fire Station (c.1910, dem. 1970s) was a landmark on Battersea Bridge.



- 3.9 Juxtaposing on the north side were some fine townhouses and mansion blocks represent some of the best of the later Victorian Queen Anne Revival in London, set in their verdant open riverside setting, embodying the styles later connection with ‘sweetness and light’ (see Swan House, or Garden Corner, Grade II*, Appendix 1). The result was not uniformity but a legible spatial order: horizontal embankments, controlled river-edge scale, open parkland, rustic if picturesque industry, framed landmark bridge crossing in relatively close sequence.
- 3.10 The painterly qualities of the river reach had long been recognised. Its open water, great sweep and intricate, tumbling low skyline under big skies, were framed by the old Battersea bridge (Image 7). James McNeil Whistler, who lived (like J M W Turner) at Cheyne Walk, sought to capture the atmosphere in his famous ‘nocturnes’, such as his ‘Blue and Gold – Old Battersea Bridge’ (c.1872-75). These were somewhat of an artistic sensation at the time.

Image 7: James McNeill Whistler, 1878, across the reach to Morgan’s Crucible and St Mary’s.



3.11 The 20th century saw significant change (Image 8). Post-war clearance removed much of Battersea's Victorian industrial fabric and earlier working-class housing, replacing it with housing estates of much greater scale and looser grain (including the Surrey Lane and Somerset Estates). Later riverside redevelopment, including Riverside Apartments (Foster Associates, 1986-90, 8 storeys) and Albion Riverside (also Fosters, 1999-2003), introduced some taller residential-led elements, albeit composed to respect the river scale. Both signalled a new mixed-use riverside living ethos, whilst Albion, at 11 storeys, was the fifth design for the site – the others having been dismissed as too tall and bulky in this sensitive setting.

Image 8: Dame Laura Knight, 1935, looking across Cheyne Walk to Battersea. The industrial river at Battersea at its zenith, prior to substantial redevelopment.



3.12 The total loss of the old Morgan's Crucible and the flourmills site is, by today's standards, regrettable, the former replaced (between Battersea Bridge and what is now Montevetro) by the more mundane than urbane cul-de-sac which took its name,

Morgan's Wharf, of a more suburban character in exchange for the riverside walk (Image 9). But next, despite initial proposals to retain and extend the old Battersea Flour Mills, the so-called 'glass mountain', the Montevetro Tower (1994-2000), was 'called-in' and approved by Secretary of State John Gummer, said to champion controversial and challenging riverside architecture (Image 10).

Image 9: Morgan Crucible Works (1910), Church Road (now Battersea Church Road), all demolished. Of this collection of mid-rise / tall built development all that survives of this industrial heyday are the workers cottages now surviving as part of the Westbridge Road Conservation Area.



3.13 More recent tall buildings, including the Chelsea Waterfront towers on the north bank, have intruded on the historic skyline. These schemes were contentious in terms of their impact on the Thames setting but were approved by the Secretary of State, against the Inspector's recommendation (ref: APP/K5600/A/04/1146268 &

APP/H5390/V/04/1148781). These taller towers have informed the more plan-led approach now embedded in the respective Local Plans of RBKC and LBW, on either side of the river, which emphasise repair, contextual height and protection of the open, verdant character of this reach, as I address in the next section.

- 3.14 The area around the Appeal Site, between Battersea and Albert Bridges, is now known as the Ransome's Walk Focal Point of Activity, continues to evolve in line with the Council's Local Plan and Urban Design Study (2021), which I will come to address. The Royal College of Art (RCA) joined acclaimed architects, Foster and Partners, and global fashion brand, Vivienne Woodward, in making a new home here - attracted to Battersea by its old industrial floorplates and potential to expand. Its first phase in 2009 was a painting studio, in part of an old factory shell, and later extended as a low to mid-rise contextual building with a 'saw-tooth' roof riffing on the skyline of old industrial Battersea. The evolution of the RCA meant that by 2022 the landmark Herzog & De Meuron Studio Building (c.6 storeys), and Rausing Research & Innovation Building (8 storeys) defined the evolving, prevailing low to mid-rise campus skyline. This growth is set to continue and in 2026 Vivienne Woodward demonstrated its commitment to this emerging creative ecosystem with a planning permission for the part re-use and modular extension of their site, layering old and new, playing on the fashion brand's tartan, plaid and patchwork (7- 10 storeys) (ref: 2025/0799). This is an area evolving in a graduated, organic manner, stepping down from the riverside.
- 3.15 Today, what remains most characteristic of the Chelsea–Battersea reach is the spatial breadth of the river, the generally open treelined embankments, the parkland opposite formal terraces, and the landmark sequence of Battersea, Albert and Chelsea Bridges. In general, especially on the south side, development is set back from the river edge, low to mid-rise, up to 5/6 storeys, despite clear post-war and more recent intrusions. It is still possible to understand the transition into central London beyond Chelsea Bridge.
- 3.16 The designated assets listed in Appendix 1 - including the Royal Hospital and its registered landscape, Chelsea Old Church, Chelsea Physic Garden, Albert Bridge, Battersea Park, Battersea Bridge, Cheyne Walk terraces and associated Conservation Areas - form the framework within which this character has evolved.
- 3.17 It is against that layered but legible evolution that the effects of the Appeal Scheme on spatial character and heritage setting is understood.

Image 10: old Battersea Flourmills prior to replacement by the Montevetro Tower in the 1970s.



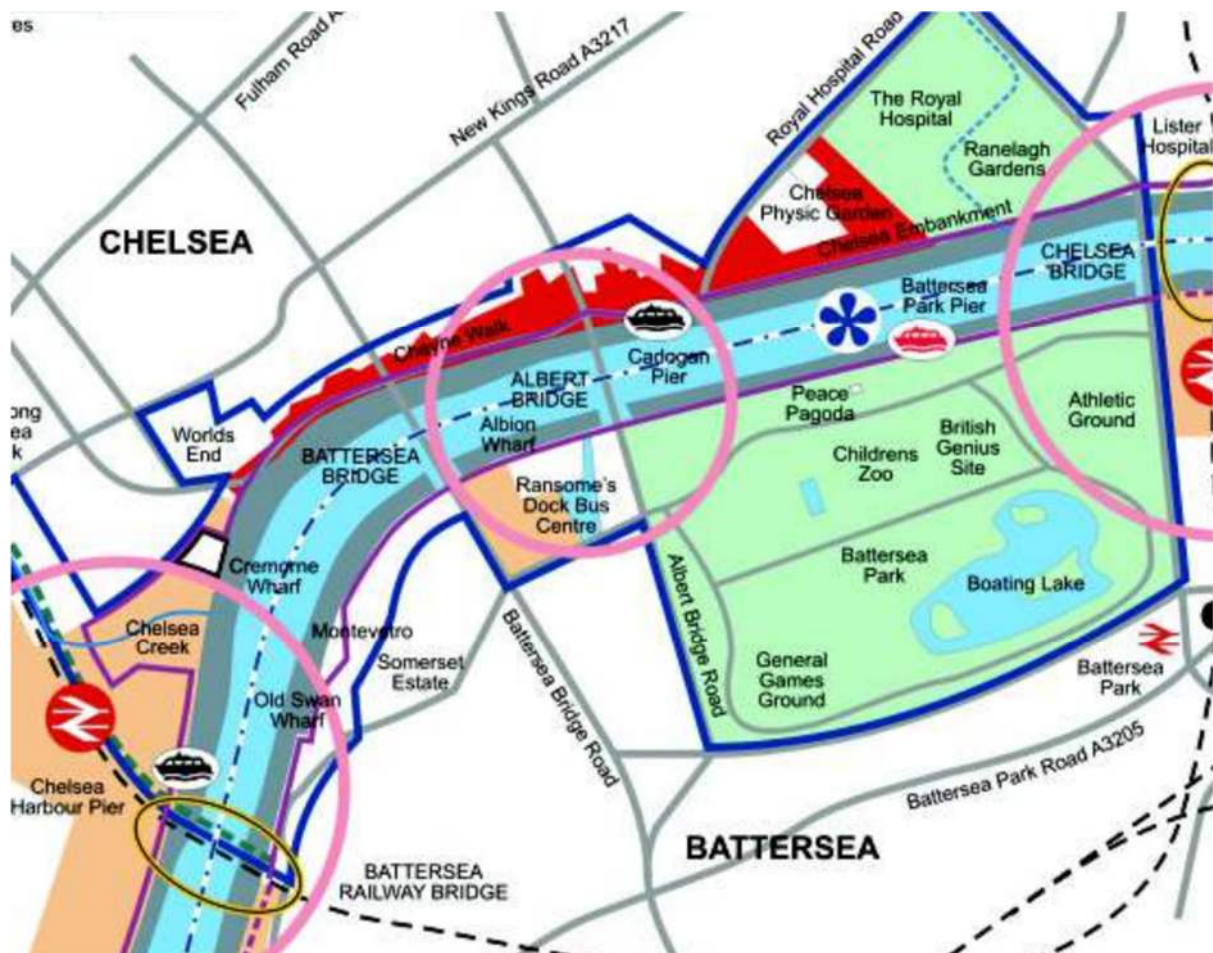
The Character Assessment Background - the River Corridor:

- 3.18 At present, the River corridor is defined, to a significant degree, by the controlled nature of the open and lush Chelsea Embankment, which includes a significant amount of formal / informal parkland and gardens set back from the formalised granite embankments and tree-avenue edges. This includes the Royal Hospital grounds, Battersea Park, the Chelsea Physic Garden, Chelsea Embankment Gardens and Cremorne Gardens. Development is, on the whole, on both sides, set back from the River edge, and generally between 3-6 storeys, with the particular outlier being Albion Wharf at 11 storeys. This allows for the broad horizontal plain of the river and its lower valley sides to remain pre-eminent and predominately open. It also frames and gives spatial reading of the landmark river crossings, namely Albert Bridge and Battersea Bridge, but also those historic local landmarks, including the Royal Hospital, Battersea Park, Chelsea Old Church and St Mary's Church. These are accentuated by a finer, textured grain, in particular on the north side. However, this spatial character has been eroded by later 20th and 21st Century developments, discussed below.
- 3.19 It should be noted that an attempt was made around the millennium to develop a strategy for the River Thames – The Thames Strategy – see Thames Strategy Kew to Chelsea (2002) (CD5.37). This recognised the outstanding nature of the Chelsea Battersea Reach of 'model townscape and landscape (4.85). It recognised that Chelsea Hospital and Battersea Park to be outstanding examples of their period which assist in creating 'a green gateway to the urban Westminster boundary' (ibid). It identified its many impressive views into and out of the riverside, in particular from the bridges. It identified Battersea Bridge as a 'focal and viewing point with opportunities for better riverside links at ends' – and also Albert Bridge as 'an outstanding example of an historic sustainable bridge framing all river views' (4.78). It found the overall impression of the Chelsea side as one of attractive historic buildings screened by nearly continuous trees and dispersed with landmarks such as the Royal Hospital and Chelsea Old Church, as an important reminder of the village origins of Chelsea. This has helped shape a focus on the character of the river reaches.

- 3.20 The Wandsworth UDS (CD5.16) informed the adopted Local Plan’s plan-led approach to tall buildings and growth; including along this part of the River. The site is in Character Area B2 (Battersea Riverside) (pages 60-63).
- 3.21 It identifies the interest in riparian views across the Thames into the Royal Borough of Kensington and Chelsea (RBKC), and up and down the River corridor more generally. This has informed the design-led approach to height and growth. My evidence also considers, as relevant, RBKC’s Character Study (2022) (CD5.24) at the end of this section. This also provided a character baseline assessment which underpinned the soundness of RBKC’s design-led approach to growth in its adopted Local Plan (2024).
- 3.22 The Appeal Scheme affects riparian views from and across the Thames, in particular on the Chelsea Reach and the Battersea Reach (Image 11). This is, to a greater or lesser extent, from both banks, its embankments, piers, the Thames Path National Trail and adjacent public (or semi-public) parks and gardens. The viewing area, as a whole, is of local, metropolitan, national and even international – the Thames embankment schemes up with some of the most significant metropolitan enhancements in Victorian Europe - interest as a piece of townscape and heritage. The area is all in the Thames Policy Area – a special policy area the London Plan requires all riparian boroughs designate – for the purpose of, amongst other things, protecting its special character.
- 3.23 As baseline, the UDS (CD5.16) and Character Study (CD5.24) are not silent on the issue of baseline cumulative harms to character and heritage. Under ‘Negative qualities’, the Wandsworth UDS (CD5.16) recognises that imposing landmark buildings, due to their massing, lack local distinctiveness in this traditionally low-lying edge of centre part of London’s premier natural asset, the River Thames. The Character Study (CD5.24) considers that new development on that south side of the River is ‘often poorly integrated, creating discordant juxtapositions between old and new development’ (pg 62). More specifically, it identified that: ‘The tower at 1 Waterfront Drive in the adjacent LB Hammersmith and Fulham which fronts onto the Thames is a significant departure in terms of height, grain and design to that found in the area (with the exception of the World’s End Estate) and will alter the skyline in this part of the borough’ (ibid). RBKC’s Building Height in the Royal Borough SPD (2010) (CD5.25) identified the World’ End Estate as having a dominant effect on its surroundings (2.10-11). It identifies, unlike in central London, that none of its tall building clusters ‘signal

a significant concentration of commercial activity’, nor ‘produce a distinctive or ‘signature’ skyline’ (2.12). It finds that ‘none of these clusters relate to its neighbours in terms of scale, height, pattern and character’ (para 2.14), stating that they: ‘affect the setting of listed buildings and views of historic skyline some distance away: when seen from conservation areas nearby or from the river prospect of Chelsea Embankment, the clusters appear out of place disrupting the urban pattern, scale, roofscape and building line of homogenous Georgian and Victorian residential quarters’ (2.14).

Image 11: Battersea and Chelsea Reach of the River Thames, as set out in the Thames Strategy – Kew to Chelsea (2002).





3.24 In common with the RBKC Character Study (CD5.24), the Wandsworth UDS (CD5.16) identifies incongruous taller elements as having fragmented the character of Character Area B2 (pg 62), creating awkward juxtapositions with surviving historic patterns of development. As a result, and given the diversity of architectural expression, it finds that B2 has - on the whole - an incoherent character. As such, the UDS (CD5.16) strategy is to ‘restore’ and ‘improve’, rather than ‘transform’ local character – aiming to add coherence and distinctiveness which enhances the character. To do so it seeks to, amongst others:

- Respect and restore historic elements;
- Preserve linear views along the River;
- Seek new development of distinctive character that creates remarkable landmarks.

3.25 The matter of landmark creation is met head-on in the ‘Design Quality’ section of this Proof. To be clear, what it doesn’t say is that means landmark height at any cost. In fact, it takes a cautious, qualified approach (pg 63). Critically, it requires new height address the area’s role as a visual backdrop to, and the setting of, River views from RBKC, of Battersea Park and of the areas historic character, more generally.

3.26 Based on this analysis, the UDS (CD5.16) resulted in the adoption of two tall building areas, TB-B2-04 and TB-B2-03 (Image 12), which adjoin and sit opposite the site,

respectively. It designated the Appeal Site as a mid-rise zone (MB-B2-02), to step down to Battersea Bridge and Battersea Bridge Road. Another MB-B2-03 seek to step down to Albert Bridge / Battersea Park on the opposite side (Image 13). A tall building is defined in Local Plan Policy LP4 Part A (CD5.02) as one which is 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower). However, importantly, the UDS (CD5.16) states that any additional height should give consideration of:

- i.) 'The cumulative impact on the River Thames';
- ii.) 'The setting of key heritage assets' ('such as Battersea Park Registered Park and Garden and the listed Battersea Bridge are protected').
- iii.) The relatively small scale and green character of the north bank, which should be positively responded to;
- iv.) That 'buildings should step down towards the approaches to the listed Battersea Bridge and Albert Bridge' (our emphasis) and that, in TB-B2-03;
- v.) Tall buildings should have 'regard to the small-scale character of the adjacent Westbridge Road Conservation Area'.

3.27 In testing the appropriate building heights for TB-B2-04, adjoining the Appeal Site, the UDS (CD5.16) treats Albion Riverside as a 'modern landmark' which evidence found sat positively on the River, due to its setback and relative scale. However, it excluded Albion Riverside from the tall building zone, it having reached its maximum height threshold which set the *maximum* height range for the tall buildings area (12 storeys – Local Plan, Appendix 2, pg 456). Fundamentally, the UDS concluded (at CD5.16, pg 239):

'The heights of buildings generally along the riverfront here are considered to be at capacity. Increases in height would risk adversely affecting the character of the River Thames including the north bank which is designated as a conservation area by the Royal Borough of Kensington and Chelsea. Taller development would also sit uncomfortably between the two listed bridges (Battersea, grade II and Albert, grade II) and would affect views from within Battersea Park Registered Park and Garden'.*

3.28 As discussed, the mid-rise zones either side of the tall building zone, including the Appeal Site and that adjacent to Albert Bridge, were allocated to step down to the historic bridgeheads.

3.29 It is worth noting that the ambition under tall building zone TB-B2-03, on the opposite side of Battersea Bridge Road from the Appeal Site, is also to step down to the closest edge approaching the Battersea bridgehead. The UDS (CD5.16, pg 237), states that development should:

- ‘Respond positively to and preserve views of the listed Battersea Bridge’.
- That a landmark building of up to 12 storeys should ‘allow appropriate stepping down towards Battersea Bridge (and Battersea Bridge Road), Battersea Square Conservation Area and Westbridge Road Conservation Area immediately to the south’.
- Development around a 12-storey landmark should ‘generally be lower than 10 storeys and should be carefully planned to avoid a canyoning effect along the River Thames which is already heavily developed in this part of London’.
- It is noted that Montevetro Tower detracts from the Character Area and should not create a precedent for development of such scale on the Riverside.

3.30 It is necessary to establish here that this is guidance, and, of course, all proposals will need to be assessed against the wider provisions of the Development Plan. It might be that, for other reasons, not least character and heritage, amongst others, that development won’t reach the *maximum* parameters of the tall or mid-rise zones. Indeed, a number of more recent schemes in the Ransome’s Dock Focal Point, do not. The justification of LP4 (para 14.30) is clear on this point:

‘The designation of an area as a tall building zone does not mean the area has capacity to host tall buildings within the appropriate range across the entire zone. Development proposals will need to relate appropriately to the specific context of the site, existing buildings in the locality and any other tall building proposals in the area, including schemes with an extant planning permission’.

3.31 In fact, the UDS (CD5.16), in addressing tall building capacity (pg 14), and acknowledging the potential of tall buildings on the riverfront, explicitly recognises its sensitivity to change:

‘However, the impact of riverside development goes well beyond the borough boundaries and therefore must continue to be carefully planned to protect the character

of both banks and the overall historic and cultural importance of the River Thames as a globally recognised characteristic of London’.

3.32 It goes on to state, at 4.5.2, that all tall building proposals would need to have particular regard to historically sensitive sites on the north bank and that the intent of the tall building zones is to help steer appropriate tall building development, including in the context of cumulative impacts.

Image 12: Tall Building Zones adjacent to and opposite Appeal Site.

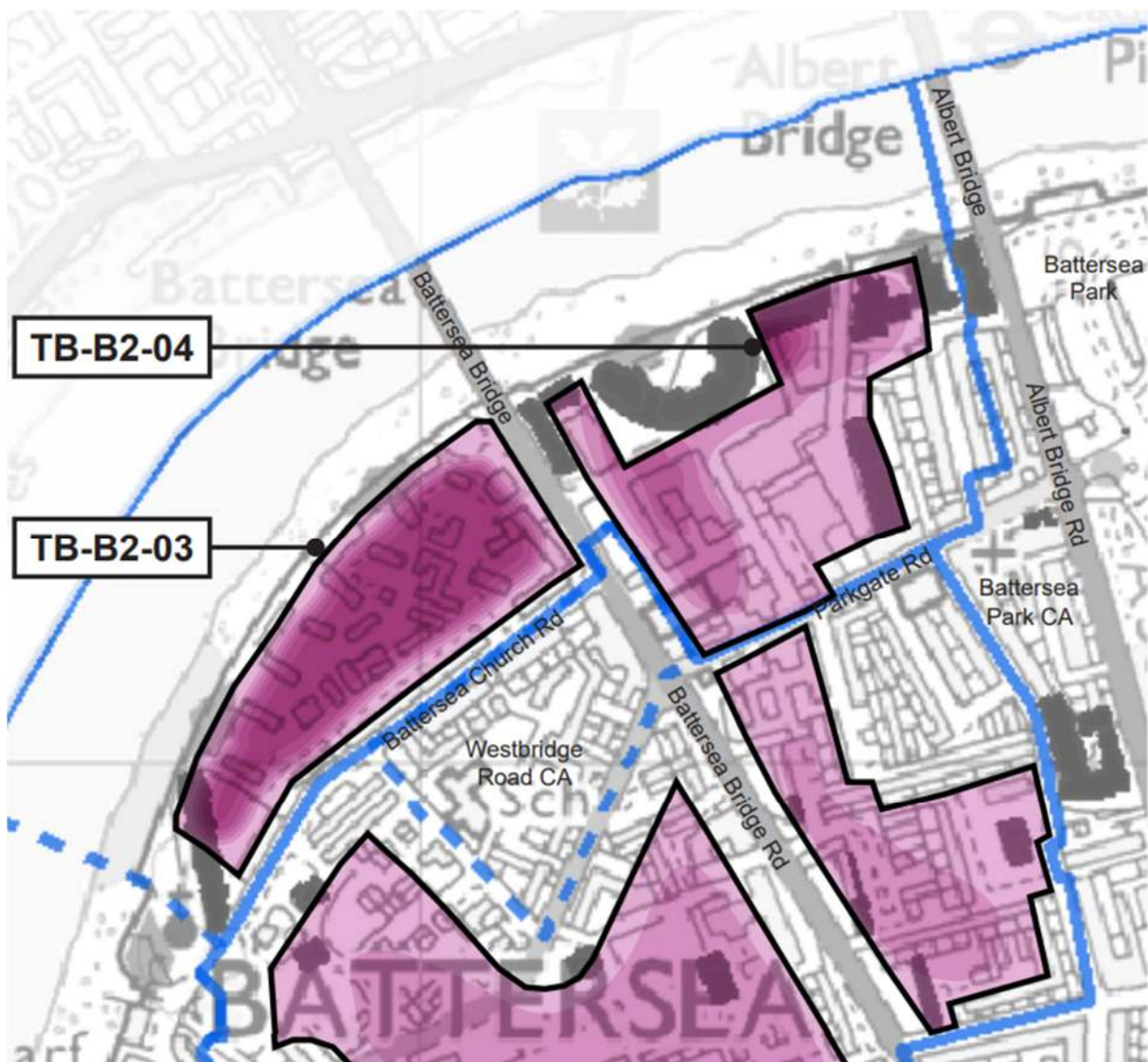


Image 13: the Appeal Site is in mid-rise zone MB-B2-02.



- 3.33 On the opposite bank, the Appeal Site is near and would affect three Character Area's identified in RBKC's Character Study which together comprise the Royal Borough's whole riparian frontage. These are B1 (Lots Village and Stanley), B4 (Cheyne) and B6 (Royal Hospital). The Character Study doesn't anticipate significant growth along this riparian frontage; indeed, the vast majority is conservation area and/or listed/registered, and identified as having a high sensitivity to change (Figure 217) with a lower end potential for growth (Figure 219). In fact, RBKC's Building Heights SPD (CD5.25), referred to in the Character Study, identifies the whole of the riparian frontage as highly sensitive to tall buildings, including the river as a buffer zone to conservation areas, and view corridors (Figure 7). It is noted that Character Areas B4 and B6, the majority of the riverfront, are not assessed in detail as, due to their high sensitivity, they are unlikely to be able to accommodate significant change over the Plan period.
- 3.34 This evidence base, which underpinned the up-to-date Local Plan's, and in the case of the UDS (CD5.16) the design-led growth strategy and LP4, is integral background to my main body of evidence on the spatial character impacts. Overall, it is clear from the RBKC Character Study (CD5.24) and associated planning policy and guidance, and the Wandsworth UDS (CD5.16), that the character of river corridor is sensitive to tall buildings further fragmenting and undermining character - that existing detractors are not used as precedent - and that the riverside has broadly reached its height limit, other than the Morgan's Wharf site, where there is an opportunity to repair character, in part lost historically, through additional height.
- 3.35 My evidence, in assessing impacts, will refer to the UDS (CD5.16) analysis underpinning the strategic approach to height. It will take impacts sequentially, focused on 'viewing areas' which incorporate long-range, mid-range and immediate townscape

visual impacts. It will build on those baseline cumulative harms identified which the Appeal Scheme, to a generally much greater degree, would compound.

- 3.36 Overall, the visual evidence to follow will demonstrate how the height and scale of the Appeal Scheme would harm the character of the river corridor in a manner predicted in the UDS (CD5.16) underpinning the Local Plan.

Late, Additional Evidence:

- 3.37 I refer to point 15 of the Inspector's post-CMC note:

15. The appellant will submit additional visualisations and provide an accompanying note to clarify the points it is taking on these additional visualisations by no later than 9 February 2026.

- 3.38 The additional visualisations were received at 1803hrs on Monday 9 February 2026 from Tom Green at DP9 and comprise:

- 1 x 360 animation video;
- 3 x illustrative CGIs;
- 27 x verified HTVIA views;
- 8 x animation kinetic sequences.

- 3.39 At no point, in the spirit of collaboration and saving inquiry time, did the Appellant reach out to the LPA to seek to agree the scope and nature of this new evidence. This extent of the additional evidence provided to us extends well beyond what was intimated in the Statement of Case and at the CMC and includes for example a range of animation sequences. Had the Council been informed as to the extent of the new evidence that the Appellant intended to introduce it would have taken a rather different position that it did at the CMC in respect of its admission. We would have been clearer as to the need to try and agree the scope and nature. It is with regret that we have to address this at this late stage.

- 3.40 The covering note accompanying the animated kinetic sequences did not, as should be standard, indicate an accepted professional industry standard methodology for their

production. As always, it is our position that views should be experienced on the ground and with the human eye. In doing so, it will be noticed that the view does not appear to reflect (or come close to) the human eye. In addition, what will become clear, is that there appear to be inaccuracies as to how the skyline and existing built form is modelled – and this can be confirmed on-site. Not least, for example, from the animated video from the Royal Hospital and the Chelsea Embankment where taller buildings are shown to breach treelines which the ground conditions (and, in one instance their own verified photography) confirms is either not the case or has been exaggerated. It suggests potential material cumulative schemes but does not confirm what these are and, if confirmed, which did not form part of the application submission determined. One such example we understand could be the Fulham Gasworks site in the LB of Hammersmith & Fulham. We have concerns about how this has been rendered in the new evidence. In addition to this, I have concerns about the accuracies and renderings in the animated sequences, not least:

- How it has reflected/rendered baseline public realm and architectural conditions, including vegetation, in an inaccurate manner which could mislead.
- That it includes public realm enhancements which are not in its gift, and which do not form part of the Appeal Scheme, namely those to the car parking area at the junction of Hester and Battersea Bridge Road. This is outside the Appellant's ownership. We contend this is inaccurate and misleading.
- That it has sought to selectively convey, the spatial implications of tall building zones TB-B2-03 and TB-B2-04. Its renders suggest a 'wall' of development hard up against the river and Battersea Bridge which runs contrary to the UDS (CD5.16) guidance I have set out.

Battersea Park environs:

3.41 This is a large and varied viewing area covering the whole of Battersea Park. The Appellant's Zone of Theoretical Visibility (ZTV) demonstrates the Appeal Scheme will be visible in views from within and across its extent. This will include its carriageways,

winding paths, recreational fields and embankment. This is given partial coverage in the views contained in the Built Heritage, Townscape and Visual Impact Assessment (BHTVIA, CD 1.02) which is supplemented in this assessment by important views between Figures 1-14 of Appendix 2.

- 3.42 Battersea Park is a very significant and sensitive in character terms. It has upmost importance as a landscape/townscape piece, with a high sensitivity to change. It is a premier local, Borough and London-wide natural asset and Grade II* registered historic park and garden. Its picturesque, meandering style, gardenesque elements, pre-eminent nature, sense of secluded enclosure, and openness, all make a substantial contribution to local character and distinctiveness.
- 3.43 It shares a group value with Chelsea Bridge (Grade II), Albert Bridge (Grade II*), the Royal Hospital (Grade I listed buildings, its associated registered landscape (Grade II) and Conservation Area), the Thames Conservation Area and the Cheyne Conservation Area. This is as part of a wider local Thames-scape which is of very high amenity value.
- 3.44 It is clear that the height and scale of the Appeal Scheme will further the encroachment of modern urbanising development above a integral treeline horizon. It would be a prominent intrusion detracting from the Park's pre-eminent secluded nature and the sense of being 'set apart' from the city.
- 3.45 In particular, this would be evident in broad open views across its open lawns, including the lake, fountains and meandering paths. This would exacerbate the intrusive influence of the Chelsea Waterfront West Tower which is, at least, further away and slenderer (Appendix 2, Figures 3-7). This is in addition to the intrusion, in particular, of the towers on the tower Battersea Gasholders site (101 Prince of Wales Drive), other post-war towers, and, albeit at distance, the Nine Elms / Vauxhall cluster. That visual intrusion would most likely be evident from the western side of the Park which is more intact and lower-scale, for example around Carriagedrive West and the central W-E avenue, including on main approaches (Figures 9-14). From the main northwestern entrance to the Park, for example, the proposal would rise above and detract from the visual integrity and authenticity of the historic environment enclosing the park (Figures 10-13).

- 3.46 That visual intrusion would be most sensitive from the Thames embankment of the Park. As seen in Figures 7-9, the harm caused by the intrusion of the Chelsea Waterfront Towers is evident now. The proposed height and scale of the Appeal Scheme would rise behind the landmark Peace Pagoda and diminish the prevailing mature treeline which defines the open river edge. This would become more apparent as one approaches Albert Bridge. These are highly sensitive and significant river prospects where the shared group value between the Park and the lower-scale, verdant Chelsea Embankment, the Royal Hospital, and the landmark presence of Albert Bridge. From here the Moravian Tower and World's End Estate towers are a distinct distracting visual influence – though these would be eclipsed by the dominant visual intrusion of the Appeal Scheme. This would impinge of the openness and prevailing scale of the River edge, detracting from its character.
- 3.47 It is recognised that these effects change with the seasons – and that greater visual intrusion would take place when trees and other vegetation is not in leaf. However, even when not in leaf, and the Appeal Scheme would erode the intricate skyline presence of mature and specimen tree boughs – this still dilutes the secluded nature and openness of the Park and undermines its historic group value relationships.
- 3.48 Overall, the visual impacts of the development as seen from within Battersea Park would cause harm to its character. This harm would compound that of baseline harms which have undermined its spatial character.
- 3.49 On top of the spatial character harms, heritage harms would occur to the Battersea Park Registered Landscape, Conservation Area and its listed buildings, the Thames Conservation Area, the Royal Hospital Conservation Area (and associated listed buildings and registered landscape), the Cheyne Conservation Area, Albert Bridge and those relevant listed buildings on Cheyne Walk / the Chelsea Embankment, which are dealt with in Appendix 1.

Chelsea Bridge, upstream:



- 3.50 This viewing area comprises a series of kinetic views when crossing the bridge from either S-N or N-S, with a particular impact on the views from the upstream side. The Appellant's ZTV demonstrates the Appeal Scheme would exert its visual influence across the whole area.
- 3.51 It is an unusually expansive and deep river prospect upstream the Chelsea Reach – a deep, open and straight corridor of the River Thames on the edge of central London. In fact, to the east, is the Central Activities Zone (CAZ) and the Battersea Nine Elms Opportunity Area, and the step up in scale and townscape contrast is pronounced. That the scale steps down upstream are part of reading London cultural topography. The viewing area is identified in the Thames Conservation Area Appraisal and in the RBKC Local Plan as Townscape View (T2) (CD5.19 / CD5.41).
- 3.52 The riparian townscape upstream from Chelsea Bridge is defined by its depth, openness and pre-eminence of its central object, the River Thames. The broad field-of-view

spans both sides of the River, edged by the formal Victorian embankments at Battersea Park and Chelsea. There is a general skyline balance and horizontality – the eye is lead along a largely unblemished mature treeline and the formal granite embankment to the distant meander of the river. The feathered treeline of the avenue of trees creates a distinctive skyline that is mostly unbreeched by built development which is set back from the open and verdant River edge. There is principal E-W axis focused on the next River crossing, Albert Bridge – a strategic local landmark. There is a secondary axis NW towards the processional river axis of the Royal Hospital and its formal grounds. Its openness allows symbolic landmarks in the spatial hierarchy to be appreciated along the river corridor – the Battersea Park Peace Pagoda, Albert Bridge and the Royal Hospital.

- 3.53 Its spatial qualities allow an appreciation of a transition out of central London and into its historic inner west and the Chelsea reach's deep lineage back to the time of Tudor rural retreat and later market gardens. It is one of the best places to the appreciate evolution of the Chelsea Reach as a fine piece of Thamescape, from the Royal Hospital to Victorian set-piece metropolitan improvements. It is of high spatial character value.
- 3.54 This baseline allows an appreciation for the rationale of the UDS (CD5.16), and the tall building zone adjoining the Appeal Site (TB-B2-04). This seeks buildings between 7-12 storeys (21-36m), so as to sit beneath (or around) the prevailing treelined river edge.
- 3.55 This and the kinetic visual impacts are evidenced at Figures 15-21 which is from the upstream side, travelling south to north. This assessment is assisted by View 12 in the BHTVIA. From the southern end, the proposed 29 storey tower's broad, bulky east elevation and flat top would rise as the most assertive vertical element from the Battersea Park treeline, dwarfing the landmark Peace Pagoda identified in the Thames Strategy as a focus point of the Park (4.77), whilst encroaching on the open River edge. The sheer height and scale will detract from the elegant landmark status of Albert Bridge. This situation would remain in views travelling north until, near the northern bridgehead, the tower, in association with other skyline towers, would further encroach on the landmark Albert Bridge. The subtler, lower-lying built form of the Cheyne and Royal Hospital Conservation Area, whose treeline is barely breached other than just by the landmark Chelsea Old Church, would be detracted from.

- 3.56 The treeline is not entirely unblemished – and the baseline of character harm is not neutral - but has been diminished by existing harms. The height of the 34 storey Chelsea Waterfront Towers West and East intrude above the prevailing skyline datum, more so than the King’s Tower (Chelsea Creek, SW6) behind. The World’s End Estate towers also diminish the primary axis and the landmark presence of Albert Bridge. However, these harms are mitigated by their distance, architectural symbiosis (group value), and in the case of Chelsea Waterfront, the slenderer forms up to a pointed ‘crown’ which steps back from the river edge. There would be no such synergy with the Appeal Scheme, whose broad width, closer to the observer, would be of a dominant height and scale which would become the most dominant feature of this view. It would undermine the group value which mitigates the impact of the towers behind. It would likely create a disjointed, and thus further detracting, group of tall building, which would in part coalesce.
- 3.57 The Appeal Scheme would further draw away from the pre-eminent River’s broad horizontal plane, as the most visually conspicuous vertical element. It would detract from the open river edge, and the prevailing integrity of the verdant enclosure of the river corridor; from Battersea Park, the Chelsea Embankment, and the landmark Albert Bridge which frames them. Its sheer height and scale would accentuate an unbalancing the river composition off its main axis, creating a new centre of gravity which draws away from the depth of the river reach towards what remains of an open horizon. It would detract from the secondary axis with the landmark Royal Hospital and its wider verdant riparian setting.
- 3.58 The tower, unlike the towers behind it at Chelsea Waterfront/Lots Road, would appear a more isolated intrusion, which would self-evidently not form a group with the other towers. As the observer moves through the view northbound, the combined effect would accentuate a ‘canyoning effect’ on the distant river corridor terminating the view. It would detract from the sense of stepping down from the topography of London; where there is a clear distinction between ‘here’, and the upstream ‘there’ forming the emerging Battersea / Nine Elms Opportunity Area. It is considered the affect on spatial character would be significant and adverse.
- 3.59 As addressed, the Appellant submitted late, new evidence which could affect this viewing area. This contained cumulative scheme implications which could be material

to the impacts from the bridge, and which would have further adverse impacts. As one moves north across the bridge what we understand is the consented towers on the Fulham Gasholder Site will further a wall effect of taller built development impinging on the River and the landmark presence of Albert Bridge. However, this effect would be much lesser than the nearer height and scale of the Appeal Scheme.

- 3.60 On top of the spatial character harms, heritage harms would occur to the Battersea Park, the Thames Conservation Area, the Royal Hospital Conservation Area (and associated listed buildings and registered landscape), the Cheyne Conservation Area, Albert Bridge and those relevant listed buildings on Cheyne Walk / the Chelsea Embankment are dealt with in Appendix 1.

The Royal Hospital and environs:

- 3.61 The environs of the Royal Hospital are of the highest townscape value and sensitivity to change. The Applicant's BHTVIA's ZTV shows an extensive theoretical visibility across Burton Court, Royal Hospital Road and the landscaped formal grounds south of the Royal Hospital complex towards the River. BHTVIA Views 2, 1 and 23 have been produced to supplement this assessment. It should be noted that, on the ground, those views do not seem to accurately correspond with the views map. Neither is there any proper consideration of views from Royal Hospital Road / Burton Court. The approximate location of View 1 in the BHTVIA corresponds with Panorama P3 (Royal Hospital) in the RBKC Local Plan 2024.
- 3.62 The formal river terrace axial vista opens out into a 360-degree panorama from the open main courtyard of Wren's baroque composition. This is enclosed and well-contained by the perimeter avenue of trees, including on the east side by those of Ranelagh Gardens, which were 18th Century pleasure gardens which reverted to the Royal Hospital in the early 19th Century. The focus of the view is on the granite obelisk and the southern river edge with filtered views through to Battersea Park giving a sense, other than for the historic chimneys of Battersea Power Station, of being in a wider natural landscape on the Thames, set apart from the city. This is particularly the case when the trees are in leaf. This is the setting of the iconic Chelsea Flower Show and is

a riparian townscape of the highest value for its integrity, coherence, distinctiveness and authenticity.

- 3.63 In broad views from the south terrace across Wren's main symmetrical composition the Appeal Scheme would rise in isolated fashion to breach and erode the skyline silhouette of the western range pediment and roofscape which otherwise steps down to a lower edge condition which allows the vast spatial hierarchy of this formal composition be understood. The height and scale of the Appeal Scheme, a strong vertical element on its broadside edge, would detract from the overall cohesion, integrity, composition and sense of being set apart as part of an open and verdant Thames-side setting.
- 3.64 There are some other taller buildings visible, but this is limited, and none would be as visually conspicuous as the Appeal Scheme in more sensitive views.
- 3.65 On top of this, heritage harms would occur to the Royal Hospital Conservation Area, its listed buildings (Grade I) and registered landscape (Grade II), which are dealt with in Appendix 1.

The Chelsea Embankment between Chelsea Bridge and Albert Bridge, including Chelsea Quay, the Chelsea Physic Garden, Cheyne Walk and Chelsea Embankment Gardens:

- 3.66 This viewing area comprises a long sequence of broad kinetic panoramic views of a riparian townscape spanning down and upstream, including towards the Appeal Scheme which would occupy a conspicuous position. The ZTV demonstrates the Appeal Scheme would exert its visual influence across the whole of the area, including a significant part of the Chelsea Physic Garden. However, the only view in the BHTVIA is View 4, up close to Albert Bridge. There is also a view (3) from inside Chelsea Physic Garden. This should be supplemented by Figures 22-37.
- 3.67 The Chelsea Embankment is a well-used movement corridor and place for leisure walking, replete with Victorian benches, beside the Thames between two primary river crossings: both gateways to Battersea Park (south side) and the King's Road / Victoria (north side). The low Thames edge draws the observers into deep riverine views up and downstream to the south side through the River corridor. There are moments of

pause in which the observer is invited to span panoramic views up and downstream, namely Chelsea Quay and Embankment Gardens.



3.68 This is a distinctive high-quality and, on the whole, coherent townscape. The character of the Chelsea Embankment is defined by its formally embanked edges with (sometimes double) avenues of trees creating a verdant and open river edge. An urbane scale is created by townhouses/mansion blocks of no more than 5/6 storeys, set back from the river edge. There are strong synergy with the embanked and verdant edge of Battersea Park. Significant gaps, namely the Royal Hospital Grounds, Chelsea Physic Garden and Chelsea Embankment Gardens, further the sense of lush openness and a continuous landscape-led setting of the river corridor. This creates a prevailing lower, human scale sense of enclosure and a consistent treelined skyline focuses on the river. The centre of gravity follows the river axis to its pre-eminent bridges, whose silhouettes are still in part read against open sky.

- 3.69 The incongruent height and mass of the Chelsea Waterfront towers, King's Tower and (to a lesser extent) the World's End Estate towers intrude on the open pre-eminence of the river, the landmark presence of Albert Bridge and its broadly consistent verdant enclosure. The approach through the viewing area gives clear demonstration as to the inherent logic of the UDS's Plan-led tall buildings approach (CD5.16).
- 3.70 On entering the Embankment from Chelsea Bridge, opposite the Royal Hospital, the Appeal Scheme would track beside the southern portal frame of Albert Bridge (from Figure 23). It would comprise a highly conspicuous feature to breach the prevailing skyline - of an excessive height and scale, rupturing the consistent verdant treeline datum formed by Battersea Park's embanked edge.
- 3.71 On approach to the Tite Street pedestrian zebra crossing, where there is an alignment with the Battersea Park Peace Pagoda, the site would start tracking directly behind the skyline silhouette of Albert Bridge until approaching the Physic Garden (from Figures 26/27-29). The broadside of the tower would rise in stark, harsh contrast as the landmark bridge begins to define the foreground. Once approaching the Chelsea Embankment Gardens, the more isolated Appeal Scheme, now in the near-distance, would be of such an imposing height and scale that it would overwhelm the foreground bridge and river setting, creating a stark, unavoidable gravitational pull. It would be hard-up against the River edge, eroding its openness, and the skyline presence of Albert Bridge. Once the Albert Bridge foregrounds the view (Figures 32-34); at which point the dominant height and scale of the Appeal Scheme would significantly impinge on the elegant sky silhouette of Albert Bridge, rupture a broadly consistent skyline and its harmonious scale relationship with the embankments. After dark, the Appeal Scheme's breaching of the 'spiders web' bridge structure, when lit and read against dark sky, would further erode its landmark presence (Figure 34).
- 3.72 It is worth noting, at least until approaching Tite Street, the proposal would be seen in tandem with the loose clustering of towers at Chelsea Waterfront/Lots Road. However, as discussed, the Appeal Scheme would not form a coherent or successful cluster identity. Indeed, the coherent pairing and slenderer profiles of the Chelsea Waterfront towers, which have an affinity with the King's Tower, step down to the River's edge.
- 3.73 This mitigates their intrusion on the skyline, especially when seen in context with the World's End Estate towers, encroaching on Albert Bridge. The Appeal Scheme's sheer

height and scale exacerbate the impact of the Chelsea Waterfront / Lots Road towers, undermining any slenderness, sense of cogent relationship and creating more of a bulky ‘wall effect’, further impinging on Albert Bridge and the River. From Tite St junction, the Appeal Scheme’s extensive frame would emerge into prominent view and tease away from the more distant cluster behind. Via motion parallax, as the more distant background intrusions recede, the Appeal Scheme would more demonstrably loom into the near-distance, detracting from Albert Bridge and the open pre-eminence of the River Thames.

- 3.74 In that same sequence, the logic of the UDS (CD5.16) guidance underpinning the Planned approach is clear. Albion Wharf is excluded from the TB-B2-04 tall building zone, having considered to represent the upper height threshold, whilst it seeks to step down to the mid-rise edges at the bridgeheads (MB-B2-02 / MB-B2-02). This approach would not break the Battersea Park’s treeline and consistent skyline datum, it assists the open edge of the River and recedes to the skyline presence of the landmark Albert Bridge. Once in the foreground of the Bridge the stepping down to the mid-rise edges is pronounced. This is consistent with the objectives of the UDS (CD5.16) to avoid further cumulative impact on the Thames, to respect the setting of key heritage assets and the smaller, greener character of the north bank.
- 3.75 The impact of the Appeal Scheme from Cheyne Walk / Chelsea Embankment Gardens on approach from Royal Hospital Road would be demonstrably apparent, in particular when the trees are not in leaf – as evident in Figures 35-37. From here, a similar impact can be observed as from the River edge – where the Appeal Scheme would rupture the prevailing skyline and detract from the open, verdant character of the Thames reach.
- 3.76 Chelsea Physic Garden is given discreet consideration as an enclosed and distinctive place, albeit opposite the open edge of the River. The Appellant’s ZTV suggests a comprehensive theoretical visibility, breaching the skyline of the enclosing historic environment. Whilst this place is well-treed, it does significantly open up when the trees and vegetation are not in leaf. This is a distinctive and historic place in which its openness on the verdant river, and authentic and integral historic environment, give a palpable sense of seclusion and time depth. The height and scale of the Tower, where it would breach this skyline, would detract from this distinctive sense of place.

- 3.77 As discussed, the Appellant submitted late, new evidence which I have already addressed. Despite our queries/concerns as to how this is presented, it would appear what we understand to be tall buildings permitted at the Fulham Gasholder site would add to a wall of development, albeit at an appreciably greater distance. It would move into the central axis of Albert Bridge, and the E-W axis of the river corridor. Whilst it would accentuate the intrusions of the Appeal Scheme identified - in particular as the observer moves into the foreground of Albert Bridge - the sheer visual weight of the Appeal Scheme would remain dominant, overwhelming intrusion on the river and bridge.
- 3.78 On top of the townscape character harms, heritage harms would occur to the Battersea Park, the Thames Conservation Area, the Royal Hospital Conservation Area (and associated listed buildings and registered landscape), the Cheyne Conservation Area, Albert Bridge and those relevant listed buildings on Cheyne Walk and Chelsea Embankment.

Albert Bridge, upstream and downstream:



- 3.79 This viewing area comprises the downstream and upstream viewing experience on the bridge. The Appellant's ZTV demonstrates the proposed tower would exert its visual influence across the whole area. Views from the bridge itself are not represented in the Appellant's BHTVIA, the closest being View 4. This, and our evidence here, should be read alongside our views representing the visual experience at Appendix 2 (Figures 38-46).
- 3.80 The Albert Bridge is not just a strategic local landmark but important N-S connection between Battersea Park, the Chelsea Embankment and the King's Road. It is an integral movement link, but also a place used for recreation around the River Thames. The low-span bridge and its dainty, elegant cable-stay structure recede to the openness of the River and open up spectacular panoramas which the observer is invited to pan, upstream and downstream. It invites an appreciation of a sequence of elegant Victorian bridges (Chelsea, Albert and Battersea) which provide ornamental riparian landmarks set in and

framed the lower-scale, verdant and granite-edged embankments at Battersea Park, the Chelsea Embankments (and its Gardens). The open, wide horizontal plane of the River is respected by the setback buildings of between 3-6 storeys on the Chelsea side, and on the Wandsworth side where heights step up to no larger than the set-back Albion Riverside (11 storeys). In the distance, notably beyond this reach, the cluster at Nine Elms / Vauxhall doesn't impose, but allows a reading of wider London setting.

- 3.81 Landside, there is an important townscape grouping of local landmarks on the Chelsea side – including the tower of Chelsea Old Church (Grade I) and Crosby Hall (Grade II*), set amongst a finer historic grain of the historic riverside.
- 3.82 In those bridge panoramas the sound townscape character effect of the UDS (CD5.16) can be understood. The bridgehead buildings step down to meet the low span scale of the landmark bridges, rising gradually – but not assertively – to the highpoint of Albion Riverside (excluded from the tall building zone). The proposed 7-12 storeys tall building zone would then step back from the River – recognising its present heights and scale are sufficient to preserve the openness of the River. The Appeal Scheme would be a the most visually conscious intrusion into this riparian townscape.
- 3.83 That substantial rupture in townscape is more standalone here, but is compounded to by other towers which in the baseline have undermined spatial character. These are, from south to north: the Montevetro Tower, Chelsea Waterfront Towers, King's Tower, the World's End Estate towers and the Moravian Tower (Figures 38-42). Together these have to an extent undermined the openness and pre-eminence of the river, begun to create a 'canyon' and 'wall' of development effect, which also detracts also from the finer grain and human-scaled Chelsea side. The Appeal Scheme would significantly compound this in the most visually conspicuous manner due to its relative proximity, height and scale.
- 3.84 That unprecedented height and scale of the Appeal Scheme in the immediate vicinity which would diminish the landmark character of Albert Bridge – rising conspicuously through its sky-bound, lightweight structure and diminishing its elegance.
- 3.85 In those views out from the bridge, the site occupies a conspicuous spot, best appreciated from the centre and north end of the bridge (Figures 38-40 & 43-45). The tower would dominate and, alongside the Chelsea Waterfront Towers, in particular, diminish the openness of the River, hard against its edge – detracting from the graceful

curve of the River transitioning to the acute meander of the Battersea Reach. By stark contrast, it would significantly diminish the landmark Battersea Bridge which marks this. Its sheer gravitational pull, alongside the emerging wall of development backdropping the bridge, would leave its landmark status and group value diminished.

- 3.86 In particular from the centre of the bridge (Figures 39&45), where the panoramic view opens up, the proposal would substantial rupture the careful balance between the river banks - the Appeal Scheme, alongside Chelsea Waterfront, World's End Estate and Moravian Tower - would diminish an appreciation of the finer grain, more human-scaled historic pattern of development on the Chelsea side. It would also diminish the pre-eminence of its historic landmarks breaking the treeline – detracting from the overall scene. In views which draw a section through this long corridor of the Thames, spanning Battersea Park to Cheyne Walk, the overly dominant proposed tower would create a substantially intrusive break on a harmoniously scaled skyline.
- 3.87 As before, the Appellant provided new, late evidence which we assume relates to a pipeline cumulative scheme at Fulham Gasholders. This we believe would exacerbate the damage to the river, its openness and the subtler landmark status of Battersea Bridge. However, it would still be read at a distance from the river corridor, in contrast to the Appeal Scheme, whose height and scale would still dominate the foreground and middle ground.
- 3.88 On top of this, the heritage harms would occur to the Battersea Park (Grade II*, Conservation Area), the Thames Conservation Area, the Cheyne Conservation Area, Albert Bridge (Grade II*), Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and those relevant listed buildings on Cheyne Walk / the Chelsea Embankment are dealt with in Appendix 1.

The Chelsea Embankment between Albert Bridge and Battersea Bridge (north side), including Chelsea Embankment Gardens, Cheyne Walk and Roper’s Gardens:



3.89 This viewing area comprises the downstream and upstream viewing experience from the Chelsea Embankment, its Gardens and Cheyne Walk and Roper’s Garden. The ZTV demonstrates the Appeal Scheme would exert its visual influence across the whole area. The BHTVIA includes a closer up view from opposite Battersea bridgehead (View 11) – and no view from Roper’s Gardens (Grade II registered landscape) or elsewhere. My evidence should be read alongside our views representing the visual experience at Figures 47-53.

3.90 This part of the Chelsea Embankment, closest to the Appeal Site, is a highly valued and sensitive townscape which make a substantial contribution to local character and distinctiveness. It is a key movement corridor between two River crossings, and a popular place for recreation of a local, wider-London scale, and even national level, as part of the Thames Path National Trail. Its character is defined by the broad extent and

- 3.91 openness of the tidal river under big skies. It is the historic heart and riverside of old Chelsea village, defined by the Chelsea Old Church and Crosby Hall, whose landmark presences are accentuated by their open river edge and commensurate, finer grain, human-scaled historic pattern of development in the Cheyne Conservation Area. This of between 3-6 storeys and set back from the River. The viewing area is well-contained by the bookending landmark presences of Albert and Battersea Bridges, and the panoramic views span the soft edge of Battersea Park (with central London in the distance) while Battersea Bridge marks the changing River's course. The area is in the Thames Conservation Area, which extends in both directions. The proposed tower would be a transformational and harmful addition the townscape character.
- 3.92 On approach to Battersea Bridge the horizontal plane and curve of the River's edge is apparent and leads to a generally lower horizon line under big skies. As Battersea Bridge comes into view, its landmark presence is accentuated by the openness of this River reach. However, this is intruded upon by the Chelsea Waterfront towers, in particular, but also those on the Wandsworth side identified as detractors in the UDS (CD5.16): namely the Surrey Road Estate towers and Montevetro tower. Here you can appreciate the UDS (CD5.16) approach to tall building zone TB-B2-03 which would assist in better addressing the scale of the River, shutting out those more isolated tall buildings, while steeping down to preserve the openness of the bridgeheads at the river's edge – as the Appeal Site does, as intend, at Battersea Bridge.
- 3.93 The Appeal Scheme would be much more visually dominant and overbearing than the other tall buildings. By reason of its height and scale, it would be unduly conspicuous, especially when viewed on its broad edge for much of the viewing area. It would detract from what is at the heart of these important and valued townscape views: from the primacy of the riversides low horizontal slide, from its graceful curve, from its leading and prevailing open edge. Its unprecedented scale would accentuate the visual intrusion of the Chelseas Waterfront into the open sky above the River-course, substantially undermining its pre-eminence and open character.
- 3.94 Through much of the viewing area the proposal would substantially detract from the sense of balance and pre-eminent scale of the old Chelsea side, diminishing the landmark status of Chelsea Old Church and Crosby Hall. These impacts would be

lesser, but would remain, from the Chelsea Embankment Gardens opposite the Riverside, and lesser from Cheyne Walk due to prevailing foliage.

- 3.95 The impact on Battersea Bridge as a Thames landmark, here appreciated culminating a sequence of elegant, low-span, Victorian bridges, is significant. The Appeal Scheme would compound the harm of the Chelsea Waterfront and Montevetro Tower, dwarfing its scale, diminishing its landmark presence and diminishing the openness of the River. From close up (Figure 51), when the full detail of the Bridge comes into view, and its elegant skyline of lanterns is appreciated more fully, the proposed tower at the opposite bridgehead (BHTVIA, View 11), even at its thinnest edge - the stark rise of the tower would detract from the relative scale and proportions of the landmark bridge.
- 3.96 Ropers Gardens, set off the Embankment, is worthy of discreet consideration and is also of a high degree of townscape character importance and sensitivity, and as a partially enclosed space. By-design, this is sunk into the basements of former old Chelsea houses cleared in the post-war period, and has a distinct sense of visual containment which part-removes it from the bustle of the Embankment, opening up the River's edge and an appreciation of its primary landmarks, namely Chelsea Old Church and Crosby Hall. The Appellant has provided no views in their BHTVIA from here, and our visual analysis should be read in conjunction Figures 52-53).
- 3.97 There is not a neutral baseline for assessment – and as identified in the UDS (CD5.16) – the distracting influence of the poor-quality Surrey Road Estate towers and Montevetro Tower are apparent harms and, to a lesser extent, Chelsea Waterfront.
- 3.98 However, the Appeal Scheme would compound these harms. It would rise in broad isolation, in a striking and intrusive manner, thrusting into the above a more consistent skyline datum into open sky and diminishing the sense of being set-part in a more secluded, intimate setting. It would undermine the openness of the River's edge and diminish the scale of its primary historical landmarks, Chelsea Old Church and Crosby Hall. It would be read as fundamentally at odds with the prevailing domestic scale of the River's edge here. The other towers would be more background 'noise', and the Appeal Scheme in isolation is the primary harm to this sensitive townscape.
- 3.99 As before, the Appellant provided new, late evidence which we assume relates to a pipeline cumulative scheme at Fulham Gasholders. This we believe would exacerbate the damage to the river, its openness and the subtler landmark status of Battersea

Bridge. However, it would still be read at a distance from the river corridor, in contrast to the Appeal Scheme, whose height and scale would still overwhelm the foreground and middle ground.

- 3.100 On top of this, the heritage harms which would occur to the Battersea Park (Grade II*, Conservation Area), the Thames Conservation Area, the Cheyne Conservation Area, Albert Bridge (Grade II*), Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and Roper's Garden registered landscape and 'Awakening' statue. This is dealt with in Appendix 1.

Battersea Bridge, upstream and downstream:



- 3.101 This viewing area comprises the downstream and upstream viewing experience from each side and where the ZTV demonstrates the Appeal Scheme would exert its visual influence across the whole area. Views from the bridge itself are not represented in the Appellant's BHTVIA, the closest being View 11. This, and our evidence here, should be read alongside our views representing the visual experience at Appendix 2 (Figures 54-58).
- 3.102 As a piece of townscape, Battersea Bridge is highly important and sensitive, making a substantial contribution to local character and distinctiveness. It is a key distributor route connecting 'old Battersea' (and Clapham Junction) with the King's Road and South Kensington beyond, appreciated as much on foot as it is from a double-decker bus. It is also an important route for local recreation and connection with the Thames Path National Trail. The RBKC part of the Bridge is in the Thames Conservation Area, the old Chelsea side in the Cheyne Conservation Area, which encompasses the various listed buildings, whilst downstream is the Battersea Park Conservation Area.

- 3.103 It enjoys expansive upstream and downstream panoramic views which are appreciated in the round. The subtle ascent to a central apex, low and well-detailed balustrade and elegant Victorian Windsor-style lanterns rise to the big open skies which define the openness of this part of the River; at the cusp of the picturesque Battersea Reach bend - long associated with artistic representation for its spatial qualities. The enclosing townscape is predominantly lower-rise, in particular on the tight-knit, domestic-scale of the old Chelsea side, the Chelsea and Battersea Park embankments, with 3-6 storeys set back behind a verdant River's edge.
- 3.104 From here the UDS (CD5.16) approach is clear and sound. Tall building zone TB-B2-04 would step up towards the respectful landmark scale of Albion Riverside, stepping down to at the edges to respect the bridgeheads, including most conspicuously the Appeal Site. Similarly, TB-B2-03, on the opposite side, is intended to step down to the bridgehead, whilst stepping back to a maximum of 12 to create an appropriate river scale, avoid canyoning the River, whilst subduing the detracting incoherent vertical presences of existing harms in the form of the Surrey Lane Estate towers and the Montevetro Tower. As before, the baseline assessment is not free of existing townscape harms, in particular from the Chelsea Waterfront towers and those of the World's End Estate, which diminish the pre-eminence, low-slung horizontal course and openness of an important riverscape. This also detracts from the prevailing historic grain, scale and pattern of development. The Appeal Scheme would leave these harms in its wake.
- 3.105 Whilst seen on its slimmest edge, the proposal would result in a strident visual intrusion, rising abruptly from a carefully balanced skyline datum, puncturing the big open sky which defines this part of the Thames. It would be unduly dominant, and manifestly fail to be subservient to, not just the pre-eminence of the River, but Battersea Bridge's decorous openness and scale, dramatically subjugating its landmark river presence. Whilst it would appear in broad isolation, it would clearly and substantially be at odds with panoramic views up and downstream, detracting from the prevailing historic grain and scale of old Chelsea and its verdant Victorian Embankment opposite, the sequence of landmark bridge crossings and even Battersea Park in now at mid-distance.
- 3.106 It would be at fundamental odds with the Plan-led growth strategy which seeks to 'restore' and 'improve', rather than 'transform', the character of this part of the River –

accentuating the cumulative harms identified – to the extent the that the highly important townscape would be much diminished.

3.107 As before, the Appellant provided new, late evidence which we assume relates to a pipeline cumulative scheme at Fulham Gasholders. This we believe would exacerbate the damage to the river, its openness, but to a much lesser degree, given its set back and distance behind the Chelsea Waterfront / Lots Road towers.

3.108 On top of this, heritage harms would occur to the Battersea Park (Grade II*, Conservation Area), the Thames Conservation Area, the Cheyne Conservation Area, Albert Bridge (Grade II*), Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and those relevant listed buildings/registered landscape on Cheyne Walk and Chelsea Embankment. These are dealt with in Appendix 1.

Cheyne Walk to Cremorne Road and Cremorne Gardens:



3.109 This viewing area comprises the downstream and upstream viewing experience from Battersea Bridge, along Cheyne Walk, past Cheyne Pier and towards Cremorne Gardens, with its dedicated Thames-side public observation jetty.

- 3.110 The ZTV demonstrates the proposed tower would exert its visual influence across the whole area. The Appellant's BHTVIA includes View 10 – but there is no view from Cremorne Gardens. This evidence should be read alongside our views representing the visual experience at Figures 60-65).
- 3.111 The viewing area forms a pleasant riverside chicane, where the pre-eminent River makes its great meander in the Battersea Reach, and is embanked in brick and granite and lined by mature trees. The Cheyne Piers houseboats create in intimacy, intricacy and scale which ebbs-and-flows with the tidal Thames. This is complemented by human-scale of the varied historic frontage of 18th and 19th Century residences, oriented towards the open river view. It is of a high level of townscape importance and sensitivity. The RBKC Character Study identifies the River Thames, including the houseboats which create character and colour, as valued for its access to the water and openness and key views (pg 62). It seeks development which respects these features and the scale and proportions of the period terraces.
- 3.112 The UDS (CD5.16) rationale for Character Area B2 (and tall building zones TB-B2-03/04) from here very clear and sound. The Albion Riverside is set back to respect the openness of and the Bridge's scale and silhouette, with the intent to step development down to the opposing bridgehead either side. Baseline harms play less of a role from here, given the orientation, but the negative influence of the incoherent set of poor towers comprising the Surrey Lane Estate and Montevetro Tower, underpin the intent of the UDS (CD5.16) to create a more coherent and appropriate river frontage scale. The Appeal Scheme would substantially injure the UDS (CD5.16) study's Plan-led approach to 'restore' and 'improve' the Battersea Riverside's relationship with the smaller-scale more tight-knit grain on the Chelsea side.
- 3.113 The Appeal Scheme, at an unprecedented 29 storeys in the River vicinity here, would result in a significant skyline intrusion which would detract from the relative scale and prevailing openness of the riparian townscape. Where visible in conjunction with Battersea Bridge, this would overwhelming its relative scale, diminishing its landmark status.
- 3.114 Cremorne Gardens is treated discreetly in this proof. This is a much valued local 'pocket park' on the River's once industrial edge, put over to quite public recreation. The spectacular riparian views, with the dedicated observation jetty, is an important

stopping point on the Thames Path National Trail where the central the Thames corridor opens up, and central London reveals itself in the distance. This is of great importance and a high level of townscape sensitivity.

- 3.115 Figures 62-63 allow an appreciation of the view and the demonstrably harmful prospect of the Appeal Scheme. It also allows for an appreciation of how the UDS (CD5.16) growth strategy would facilitate the intent for Character Area B2, to ‘restore’ and ‘improve’ its prevailing character. From here, the full, low-span of Battersea Bridge can be central to an unfolding sequence with Albert Bridge, seen alongside Chelsea Old Church and the rivers verdant edge of the rivers course. The Appeal Scheme would rupture a low, deep horizon, and intricately scaled skyline datum, its height and scale in stark contrast to all its landmarks – not least the central focus, the sequence of bridges. It would significantly impinge on the river’s edge at this important pivot in its sweep, detracting from its openness. The Nine-Elms / Vauxhall cluster is a distant feature on the horizon – there is a sense of the fore and middle ground being the ‘here’ - and central London beyond being ‘there’, allowing an appreciation of the evolution into central London. Their generally slender forms, and sense that these are a contained cluster, does not exert a strong influence on the spatial qualities of the river corridor.
- 3.116 Heritage harms would occur to the Thames Conservation Area, the Cheyne Conservation Area, Battersea Bridge (Grade II), Albert Bridge (Grade II*), Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and to lesser extents the downriver presence of the Royal Hospital and Battersea Park Conservation Areas.



The Thames Path at Chelsea Waterfront to Chelsea Harbour Pier:



- 3.117 This viewing area comprises the downstream and upstream viewing experience from the recently landscaped area of ‘Chelsea Waterfront’, incorporating a dedicated Thames Path, and a bridge across Chelsea Creek. It has expansive riparian views upstream towards the site, in particular, and downstream, sweeping across the great bend in the Battersea Reach.
- 3.118 The ZTV demonstrates the Appeal Scheme would exert its visual influence across the whole area. The BHTVIA includes View 19 – but this allows only a limited window to the visual impacts. This evidence should be read alongside our views representing the visual experience at Figures 64-68).
- 3.119 As a piece of riparian townscape, there are fine, unfolding and deep views, where for the first time estuary-bound on the Thames Path National Trail, the historic heart of the Capital reveals itself, including a number of landmark places: namely Westminster Cathedral (Victoria), the London Eye (Westminster) and the City Cluster - marking the historic heart of Roman Londinium at distance. The distance allow the Battersea and

Albert sequence of Thames landmark crossings to remain prominent in the mid-distance – their shared architectural and historic backdrop comprising the Chelsea Embankment, old Chelsea and its landmark Church, create a premier Thamescape where the Thames course, and a low-scale historic pattern of development which densifies towards the horizon, allows London's topography to be read. This bend in the Thames has been painted by notable national figures, not least, J M W Turner (who died on the nearby Cheyne Walk). This is a riparian townscape of the highest value and sensitivity.

- 3.120 That said, as identified in the UDS (CD5.16), the Character Area B2 riverscape is still emerging and awaiting the ongoing regeneration of the area and the realisation of its growth strategy to enhance coherence (pg 63). Its emphasis on not repeating the cumulative harm of the Montevetro Tower or the Surrey Lane Estate towers is clear. It is also clear why the UDS (CD5.16) seeks development in the tall building zones abutting and opposite the Appeal Site to step down to the River edge and bridgehead, and how its appropriate heights range could introduce a sufficient scale and massing to subdue the bulk of the Albion Riverside – deemed at the height limit.
- 3.121 What is clear is that the Appeal Scheme would significantly undermine this prevailing townscape character, shattering the Plan-led approach to 'repair' and 'improve' Character Area B2 – but would transform it in a harmful manner. Seen on its western broadside, its massive height and scale would be unparalleled and alien and would overwhelm those other pre-eminent landmark elements which should predominate – not least Battersea and Albert Bridges, but Chelsea Old Church and the finer-grain, low-scale development which leads the eye through the rich and layered skyline of the Chelsea Embankment. It would shorten the view – being unduly prominent in the mid-distance, not only would it shatter the commodious skyline balance – it would detract from the viewers ability to appreciate that deep London topography.
- 3.122 From towards Chelsea Harbour, the Appeal Scheme would meld with, and accentuate the harm caused by, the Montevetro Tower to the open river edge - but also the scale of old Battersea, as represented by the much-diminished townscape setting of St Mary's Church (Figures 67-68). It would further upend its failed townscape 'slide' which was meant to respect its pre-eminent position on the river edge.
- 3.123 Heritage harms would occur to the Thames Conservation Area, the Cheyne Conservation Area, St Mary's Church (Grade I), Battersea Bridge (Grade II), Albert

Bridge (Grade II*), Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and those relevant designations in and including the Cheyne, Royal Hospital and Battersea Park Conservation Areas. These are dealt with in Appendix 1.

The Thames path between Albert Bridge and Battersea Bridge (south side), including Albion Riverside:

- 3.124 This viewing area comprises the downstream and upstream viewing experience bookended by Thames landmarks Albert Bridge and Battersea Bridge. The ZTV demonstrates the Appeal Scheme would exert its visual influence across the whole area. The BHTVIA includes no view from this area. This evidence should be read alongside our views representing the visual experience at Figures 69-71).
- 3.125 This short River stretch is largely modern, part of the Thames Path National Trail, is a popular and well used local route along the river for walker, runners and cyclists for movement and recreation. Increasingly it is popular with students and workers from the regenerating Ransome's Wharf Focal Point. Albion Riverside was lauded for how it responded to and opened up the River frontage, and allows for fine prospects across the river to the low-scale, fine-grain historic pattern of development defining the verdant Chelsea Embankment which allows an appreciation of its landmarks, including Chelsea Old Church and Crosby Hall. The landmark Thames presence of Battersea Bridge can be appreciated, in the context of baseline harms – here silhouetted more against sky and the finer, grain domestic-scale of old Chelsea Cheyne Walk. It is a riparian townscape of high importance and sensitivity.
- 3.126 The baseline harms are apparent, in particular here from the World's End Estate towers, and to a much lesser extent the Moravian Tower and Chelsea Waterfront. The logic of the UDS (CD5.16) is clear here: *'that the heights of buildings generally along the riverfront here are considered to be at capacity', and that, 'increases in height would risk adversely affecting the character of the River Thames including the north bank which is designated as a conservation area by the Royal Borough of Kensington and Chelsea'*. This conclusion is sound and considered the cumulative impact on the River, key heritage assets and the small scale, green character opposite. The Appeal Scheme

would significantly undermine that approach. Its 29-storey element would assertively rise above Albion Riverside, in particular from its public promenade, would significantly assert a substantial scale on the south bank. This would undermine the open quality of the River and detracts from the relatively humble scale of the bridge and its historic backdrop setting, compounding the harm caused by the World's End Estate, in particular.

3.127 Heritage harms would occur to the Thames Conservation Area, Battersea Bridge (Grade II), the Cheyne Conservation Area, Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and those relevant listed buildings on Cheyne Walk. These are dealt with in Appendix 1.

The Thames Path between Battersea Bridge and St Mary's Church and immediate environs of St Mary's Church:



3.128 The Appellant's ZTV demonstrates the proposed tower would exert its visual influence across much of the area, only to be screened to some extent by the Montevetro Building prior to the arrival at the immediate churchyard setting of St Mary's Church. That

visibility would become substantially occluded until a ‘dog-leg’ in the Thames Path around Valient House, looking back towards St Mary’s. This whole viewing area is located inside UDS (CD5.16) Character Area 2 (Battersea Riverside). The BHTVIA includes two views from this area, at View 16 and 17. This evidence should be read alongside our views representing the visual experience at Appendix 2 (Figures 72-75).

- 3.129 This viewing area comprises the downstream and upstream viewing experience at the acute edge of the meander in the Battersea Reach. It is a popular riverside promenade connecting Battersea Bridge, old ‘Battersea Village’ and beyond, via the River – the next pedestrian crossing upstream not being until Wandsworth Bridge. It also forms part of the Thames Path National Trail. As such, is an important non-vehicular pedestrian throughfare used by locals, commuters and visitors to take in the River Thames. It is an important townscape experience which is sensitive to change.
- 3.130 The character of this viewing area is defined by the open edge of the River whose kinetic views unfold as the eye is drawn to river’s navigational curve. In particular the expansive views north take in the historic, human-scale Cheyne Walk / Chelsea Embankment which helps frame the pre-eminent Thames presence of Battersea Bridge, which is often etched against the Thames’ verdant and open sky edge. The unfolding views of important landmarks, namely Chelsea Old Church, Crosby Hall and Albert Bridge, create a picturesque ensemble, of harmonious scale and an intricate skyline. Morgan’s Wharf, a 1970s residential development, occupies much of the southern edge. The Officer’s Report refers to it as spatially incoherent. That is a reflection of its lack of permeability, but also that there is greater opportunity for massing – in line with the UDS (CD5.16) and tall building zone TB-B2-03 – but this would need to address the scale of the River, and step down to Battersea Bridge, in line with the UDS (CD5.16) guidance.
- 3.131 It’s set back from an open riverside promenade, with green courtyard gaps to the observation areas, and its human-scale, traditionally formed 3 / 4 storey (with attic) forms, all recedes to the bright, open river edge. This allows important riparian views their primacy and harmony. The orientation towards those harmful baseline aspects, namely the Montevetro Building, Surry Lane Estate towers, the Chelsea Wharf Towers, the World’s End Estate towers and the Moravian Tower, exert less of an influence on the openness of the River and its framing of the important coherence and centre of

gravity in the downstream views towards the Appeal Site. The Appeal Scheme would undermine this character.

- 3.132 Perhaps the most successful aspect of the Morgan's Wharf scheme is how it meets the bridgehead opposite the Appeal Site (Figure 72) – with a generous, green-fringed open space. This is in stark contrast to the Appeal Scheme. This space allows open views of the pre-eminent Battersea Bridge, creating an amphitheatre around it. This makes the Appeal Scheme even more prominent. The broad, unrelieved rise of the 10/29 storey whole urban block, would dominate and overwhelm this important threshold at the River. Here you can appreciate the clear intent of the UDS (CD5.16) which seeks to step down to Battersea Bridge on both sides of the bridgehead, whilst having regard for the cumulative impacts on the River Thames and the smaller, greener character of the north bank. It would cause a substantial rupture in a broadly consistent skyline, diminish the finer-grain, historic scale of the north bank, dominate the landmark Battersea Bridge and by reason of its undue prominence, detract from the openness of the River.
- 3.133 As one moves south-west along the River edge (Figures 73-74) the views across the south to the north banks open up in picturesque composition. It is clear that the Appeal Scheme, on its broadside, would stridently rise above the human-scaled foreground buildings in an unduly prominent manner and enforce an alien scale in those views focused on the bridges and north bank. It would detract from their common finer grain scale and intricate skyline, including the presence of its landmark elements.
- 3.134 BHTVIA View 18, supplemented by the ZTV, shows the natural pause point in the Thames Path which allows a good appreciation of St Mary's Church making its primary address to the River. The Appeal Scheme would breach the skyline attempt at a deferential step-down on the Montevetro Building, which sought to mitigate the harm caused to the spire and its townscape presence on the old Battersea village riverfront. To the extent that its height and scale would breach the skyline, it reinforces the harm caused to the landmark Church.
- 3.135 Heritage harms would occur to the Thames Conservation Area, the Cheyne Conservation Area, Battersea Bridge (Grade II), Albert Bridge (Grade II*), Chelsea Old Church (Grade I), Crosby Hall (Grade II*) and those relevant listed buildings on Cheyne Walk.

Townscape Assessment - the Landside Townscape - Background:

3.136 These viewing areas are those considered most affected inland of the River Thames on the Surrey (Battersea, LB Wandsworth) and Middlesex (Chelsea, RBKC) landside approaches. These are generally set back from and outside the Thames Policy Area. These are more urban and enclosed, mixed and denser historic environments comprising part of historic Chelsea and old Battersea around their old bridges. The character on the ‘Surrey’ side (Battersea) is split between Character Areas B2 (Battersea Riverside) and B1 (Battersea Residential) of the UDS (CD5.16). B1 starts at Battersea Church Road and the RSA (Dyson Building) on Battersea Bridge Road. This area is characterised by mid-20th Century estates (between 5-9 & 11-20 storeys), which mix blocks and towers interspersed with lower-scale 2-3 storey Victorian/Edwardian, swaths of which are rooted in social and civic improvement and which reflect the growth of Battersea on arrival of the railway. The UDS (CD5.16, pages 56-59) identifies the following relevant to the areas general character, among others:

- Open streets, street trees and front gardens soften the residential environment.
- The remnant terraces in Westbirdge Road Conservation Area.
- The consistency of the 3-4 storey period shopfront terraces with landmarks along Battersea Park Road.
- The setting of old Battersea and Battersea Park and the proximity to the River.
- An overall sense of low-rise housing and quiet, tree lined streets.

3.137 Of relevance, negative qualities relevant here include:

- Lack of distinctive architecture and landmarks.
- Castlemaine House and Park South towers south of Battersea Park Road as visual detractors due their height and contrast with the prevailing scale.
- The Doddington & Rollo Estate towers visually detract from the character of the adjacent Battersea Park Conservation Area.
- Infill developments, particularly the plain post-war housing, creating a patchwork effect and detract from the consistency of the area.

3.138 The area near the site, comprising the Westbridge Road Conservation Area is deemed to be of high sensitivity to change and that ‘any change should respect their values and susceptible characteristics’, namely:

- ‘The historic value and uniformity of the conservation areas’, including Westbridge Road and
- ‘The uniformity of the terraced streets and the shopfront terraces’.

3.139 Overall, based on the present townscape character, the broad strategy for Battersea Residential is to ‘improve’ a fragmented character and enhance its ‘overall quality and coherence’ and to do so the Character Area design guidance includes, as relevant:

- The creation of new distinctive landmarks with design integrity which improve legibility, focused along main roads and at key junctions. Surrounding public realm should be proportionately sized so the height does not overwhelm the human scale.
- Respect the settings, proportions, scale and details of existing landmark buildings.

3.140 The following townscape character analysis has consideration to the UDS’s (CD5.16) aim and objectives in framing impacts from Character Areas B1 and B2 which interface around the Appeal Site.

Site environs of Battersea Bridge Road, Hester Road, Battersea Church Road, Westbridge Road and Parkgate Road:

Townscape Character; General:

3.141 The parcel of historic terraces bound by Battersea Church Road, Westbridge Road and the cut-through of Bolingbroke Walk comprises a cogent piece of historic Victorian townscape. Battersea Church Road and Westbridge Road are important local routes connecting the heart of old Battersea Village with Battersea’s original bridge and Battersea Park. Whilst the surrounding 20th Century estates to the south and west fragment this character, to a degree, there open, green edges, where present, help soften the more peaceful residential character, and respect the uniformity and coherence of the historic areas the UDS (CD5.16) seeks to respect.

3.142 There is a subtle, commensurate step up in scale to Battersea Bridge Road and the bridgehead, as evident in the Appeal Site, and the respectful landmark presence of the RSA Campus, at between 3-6 storeys, with its distinctive architectural expression and

roofscape. It is an award-winning piece of architecture by notable practice Herzog & De Muron & Haworth Tompkins – with its contextual references to industrial Battersea. This provides a foil to, and is contextual with, the 3-4 shopping parades which mark the increased scale commensurate to the local hierarchy, making an appropriate transition from the more domestically scaled streets up to and marking the transition to the Ransome's Dock Focal Point of Activity. This scale steps up to the landmark 8-storey Rasusing Building on the more ad-hoc, additive character of Parkgate Road. The latter comprises of a mix 2-4 storey blocks and old townhouses / workshops which provide remnants of old industrial Battersea, and which assist a transition to the 19th Century terraces and lower-scale 20th blocks to the south. There is a clear, if subtle and harmonious, sense of stepping up towards the Riverside, which includes the Appeal site and its immediate surroundings on Battersea Bridge Road / Hester Road.

3.143 Immediately to the south / east of the Appeal Site is 4-6 Hester Road, streamline modernist 6 storey blocks of fair-faced concrete and clouded glass, of a common flat-topped block scale to the horizontal slab of 5 Hester Road, both of which offer a campus style common character which meditates in scale up to the 11 storey Albion Riverside. However, on Battersea Bridge Road the Dyson Building meets the junction at three storeys, in common with the historic grain 3-4 storey grain enclosing the bridge approach something which the 1970s Morgan's Walk followed, setting back to create a green edge and open approach to Battersea Bridge. Morgan's Wharf, its prevailing scale, openness and green edges, assist in mediating with scale of the humble, domestic 2-3 storey (with attic) scale of the artisanal terraces which mark the historic fine grain pattern of development on the opposite side of Battersea Church Road.

3.144 Consistent with the UDS (CD5.16), the Westbridge Road Conservation Area is deemed very sensitive to change, at the heart of a wider immediate context to the Appeal Scheme where there is an overarching sense of a mixed, if often attractively additive character in which growth has occurred organically with respect for context. There is an apparent, is often subtle, townscape unison of coherent groups which appropriately step-up in scale to Battersea Bridge, its main approach, the mixed commercial / educational campus around Ransome's Wharf. Here, respectful landmarks mark this transition and key junctions, for example that of Battersea Bridge, Westbridge and Parkgate Roads. Overall, it is considered a townscape a moderate importance and sensitivity to change.

3.145 The visual / character impacts comprise mid and mainly immediate-range views from surrounding and adjoining streets, which lessens in longer range views.

Westbridge Road / Battersea Park Road:



3.146 The Appellant's BHTVIA ZTV indicates a comprehensive intervisibility along much of Westbridge Road. The Appellant produced Views 20 and 21 to demonstrate this impact. A kinetic approach is taken here and can be supplemented by Figures 76-82.

3.147 Westbridge Road has a generally low-rise, open and leafy character with some good surviving remnants of the Victorian development of old Battersea. The grain is fine and loose, consisting of short terrace runs and semi-detached pairs, with gaps revealing deeper, verdant garden plots, and generous front gardens adding to openness. Its mix of Victorian 'Battle of the Styles' Gothic and classism create interesting variety kept coherent by a broadly consistent building line, eaves line, and 2-3 storeys (with

mansard or attic). The diminishing proportions and broadly consistent if interesting, variegated roofline of chimney pots, dormers and gables create both intricacy and intimacy. With the soft edge of the estate opposite there is a harmonious scale and coherence. The Appeal Scheme would significantly undermine this townscape deemed very sensitive by the UDS (CD5.16).

- 3.148 In terms of the UDS (CD5.16) plan-led growth approach, it should be noted that in the wider approach (Figure 76), the top of the largest landmark in the area, Albion Riverside, just skims the ridgeline in the mid-distance, sitting below the treeline, whilst the serrated top of the RSA is recessive and in-kind: yet representing the subtle spatial hierarchy, stepping up to the bridge approach and the River. The proposal would shatter this careful, mediating approach.
- 3.149 Between Figures 76-78 the Appeal Scheme would result in a substantial visual interruption in an area of otherwise consistent building heights/rooflines. Significantly, it would undermine the coherent and harmonious sense of scale, openness and draw away from the characterful, human-scale pattern of development, appearing discordant. On approach to the junction with Battersea Park Road/Parkgate Road (Figure 78), the important 2-4 Westbridge Road (Grade II) mediates the transition to the junction defining 'The Rose' Public House in a classic London scene. It is assumed the proposed tower would cause a significant rupture of their skyline presence, undermining this effect and their townscape interest.
- 3.150 From the junction itself, orientated towards the bridgehead and the Appeal Site, that step-up in the spatial hierarchy is subtle, yet felt (Figure 79). The landmark RSA building operates as an appropriate townscape anchor, mediating a scale and development pattern contrast, between the finer-grain, 2-4 storey traditional shopping parade, and the Ransome's Wharf creative cluster. At this important node the Appeal Scheme would leave in its wake the subtle, mediating heights transition, spatial hierarchy, coherence and sense of scale. It would be so disproportionate in height and scale, including the 10-storey landward side, that it would appear highly intrusive in a broadly consistent skyline marked by smaller scale variety of expression. This unduly prominent scale would remain in breach of that broadly coherent and comparable scale as one moves towards the bridgehead, terminating the view. Here, there is an overarching townscape of horizontal expression, where the expressive balconies and

serrated roofline and gables hold a broadly consistent skyline – accentuating the rupturing vertical ascent of the Appeal Scheme, dominating the viewing area.

- 3.151 From the junction with Battersea Church Road, when the more open and green edge of the River begins to be felt (Figure 81) – the excessive height and scale would seriously detract from the openness of the River approach which is a core distinguishing feature of this River reach. It would literally tower over, and dominate, Battersea Bridge as the landmark river crossing. Rather than opening up on approach to the River, its height and scale would shut it out.
- 3.152 It is worth noting that from further south on Battersea Bridge Road (Figure 82), the prevailing character is kept broadly open and lower-rise, with open green edges to the road and the horizon is marked appropriately by the institutional gravity of the RSA building. The eye is drawn to this terminating horizon – which the Appeal Scheme would unduly dominate, appearing of an alien height and scale.

Battersea Church Road (inc Bolingbroke Walk and Morgan’s Wharf):



3.153 The BHTVIA ZTV indicates a comprehensive intervisibility along much of Battersea Church Road. Views 17 and 26 demonstrate this impact. A kinetic approach is taken here and can be supplemented by Figures 83-86. The effect here is equally pronounced, and harmful – on a main edge and approach to the Bridge and the Westbridge Road Conservation Area enclave of consistent Victorian townscape.

3.154 The UDS (CD5.16) approach here is appreciated – that the tall building zone on Morgan’s Wharf should set back and down to respect the smaller scale townscape. Similarly, the edges would set down to meet the heights and scale of Battersea Bridge Road in the distance. From here the identified shapely landmark presence of Albion Riverside emerges, but doesn’t intrude upon, the prevailing height, scale and skyline, marking the River – and the maximum height of tall building zone TB-B2-03. The humble domestic scale of old Battersea is still pre-eminent – in particular the charming cottage-style terraces (2-3 storeys), set behind front gardens, which once housed the

industrial workers. There is a strong synergy in terms of building line, heights, forms and scale, which create a verdant and open townscape of high importance and sensitivity. The Appeal Scheme would significantly rupture the present coherent character, and the Local Plan's design-led approach.

3.155 As visible from as far back as View 17, from closer to the heart of old Battersea, looking along this historic throughfare, the Appeal Scheme, as a whole – its 10 and 29 storey parts – would loom oppressively over this predominantly lower-scale, finer, more open grain context. Moving closer to the site this Appeal Scheme, especially the 29-storey aspect, would continue this effect. From Figure 83 (the Bolingbroke junction), from inside Morgan's Walk (Figure 84) and on approach to Battersea Bridge Road (Figure 85-86, and View 26) the visually dominant height and scale would crush the prevailing pattern of development, and the spatial hierarchy which subtly steps up to Battersea Bride Road and the Riverside - the substantial fracturing the preeminent sense of scale and skyline, will be pronounced.

Hester Road / Parkgate Road:

3.156 The BHTVIA ZTV indicates a comprehensive intervisibility along much of Hester Road, Parkgate Road and the residential terraces running south. Figures 87-90 demonstrate the prospective visual impacts here.

3.157 As discussed, Parkgate Road is less of a coherent townscape, with a more fragmented character (Figure 90)– but where nevertheless, there are pockets of interesting historic industrial architecture put to modern use, shopping parade animation, and a clear sense of transition in heights, scales and grain between south (Battersea Residential) and north (Battersea Riverside). From here, the Appeal Scheme, by reason of its unprecedented height and scale, would rupture that mediated transition in heights and scale, including the institutional landmark presence of the RSA Rausing Building.

3.158 From Hester Road, from around the junction with Elcho Street and around the Albion Riverside public realm (Figures 87-89), there is a clear transition in scale down from its landmark presence to 5 and 6 Hester Road, which form somewhat of a coherent architectural group. The Appeal Scheme would appear to dwarf all of these and

significantly rupture its coherent townscape qualities of lower slung, horizontal blocks. From the junction with Battersea Park Road, the RSA Dyson Building steps down to meets its scale, whilst the 10-storey landward side of the Appeal Scheme would result in a stark transition in scale, engulfing the open edge to the Battersea Bridge approach.

Environs of Beaufort Street, Danvers Street, Poulton's Square, Carlyle Square and Park Walk:

- 3.159 The impacts from the inland Chelsea side of the River are significant and affect townscape character of the highest order, spanning attractive, finer-grain, human scale residential streets and squares of a high level of coherence, integrity and authenticity. As discussed, the relevant Character Areas in the RBKC Character Study, which underpins its Local Plan, on the whole, lists these areas of high sensitivity to change and does not anticipate significant growth.
- 3.160 The Appeal Site terminates a strong north-south axis running up Beaufort Street, which is an important local distributor road connecting Battersea Bridge, Chelsea and South Kensington. The southern tip, around the Battersea bridgehead is in the Cheyne Conservation Area, as is the junction with the King's Road beyond which is in the Chelsea Park / Carlyle Conservation Area (Figures 91-92). In general, there is a coherent scale, heights and typological groupings of Victorian / Edwardian townscape: comprising of mansion blocks, shopping parades and villas of between 3-6 stories. In these views, the closer you get to Appeal Site, the more of an intrusion the Appeal Scheme would be. Its strident height and scale would draw away and detract from the harmonious and coherent height, scale, skyline and general pattern of development. Closer to Battersea Bridge, the proposal would significantly detract from the open skyline presence of the landmark bridge.
- 3.161 Danvers Street is a local connection between the King's Road and the Embankment (and Roper's Garden) via the fashionable Poulton's Square. It is a fine period set-piece ensemble in which the whole square (1-26 & 34-56 & 27-33) and 37-57 & 24-36 Danvers Street form a strong group value with 17-33 Danvers Street. This harmonious grain, heights, scales and skyline derive from its uniform terraces of stock brick and

stucco, with an integral skyline parapet. The Appellant's BHTVIA's ZTV demonstrates visibility of the Appeal Scheme throughout the viewing area. It includes View 6 (which appears mislocated on the map) and misleads as to the full visual character impact. This assessment should be read alongside Figures 93-97.

- 3.162 The Appeal Scheme would rise above and conspicuously breach the integral, unbroken long parapet line in views N-S on approach to the River, undermining this set-piece, coherent and authentic townscape, diminishing its consistent skyline and scale. On approach this would diminish the pre-eminent skyline presence of the landmark Crosby Hall, undermining its sky silhouette. On approach to the River, this would be particularly intrusive (Figures 95-97). Albion Wharf (11 storeys) provides a respectful backdrop and underscores the UDS (CD5.16) approach to draw it out of the tall building zone, which would step up to its height.
- 3.163 The BHTVIA ZTV demonstrates extensive theoretical visibility across the north and eastern parts of Carlyle Square, the central landscaped garden and enclosing north and eastern terraces. This is reflected in part in View 5, from the northeastern corner of the Square (supplemented by Figure 98). This is a coherent Victorian townscape of formal square set around picturesque garden, enclosed in 3-4-storey paired townhouses of consistent height, skyline and scale. The view would be more distant, fleeting and, to a degree, peripheral to then view - but to the extent its discordant height intrudes in this cogent townscape scene, it is harmful.
- 3.164 The BHTVIA ZTV demonstrates extensive theoretical visibility along the extent of Park Walk, a straight, popular and attractive local connection between Fulham Road and King's Road. Despite this, just View 8, from the furthest junction with Fulham Road is included from the edge of the Bolton's Conservation Area, looking into the Park / Carlyle Conservation Area. It is a townscape of high importance and sensitivity to change. It generally comprises a mix of 4/4 storeys Georgian townhouses and 5 storey (over basement) mansion blocks. The baseline Moravian Tower detract from this in prominent position terminating views which follow a broadly consistent skyline which can be followed in Figures 99-100.
- 3.165 The proposal would, it appears, be in part obscured by the Moravian Tower. It would however erode the consistent and coherent enclosure formed by the long terrace parapet

lines and diminish their scaling relationship with, and the skyline silhouette of, the Church of St Andrews as the pre-eminent historic landmark of strong group value.

- 3.166 On top of this, heritage harms would occur to the Thames, Cheyne a, the Boltons and Chelsea Park Carlyle Conservation Areas, Battersea Bridge (Grade II), Crosby Hall (Grade II*), the Church of St Andrews (Grade II) and 24-36 & 37-57 Danvers Street which are dealt with in Appendix 1.

Mian Issue A - Character and Appearance – Conclusions:

- 3.167 In summary, this evidence sets out in detail the far-reaching impacts on spatial character and appearance identified in the Officer Report to Planning Applications Committee.
- 3.168 These harms would stretch up and downstream a long corridor of the Battersea and Chelsea Reaches of the River Thames, London's premier natural asset. All are in the Thames Policy Area and the spatial character of the river corridor is of high importance and sensitivity to change.
- 3.169 As set out in evidence, the Appeal Scheme, due to its prominent height and scale, would have a harmful impact on this riparian townscape in long-range, mid-range and immediate riparian views, to various degrees dominating, diminishing and detracting from these key viewing corridors towards strategic landmarks and heritage assets, contrary to D9 Part C1a-i-iii and LP4 Part B1/3. In doing so, from as far as Chelsea Bridge, to Chelsea Harbour, the Appeal Scheme would create a substantial visual interruption in an area of otherwise very consistent building heights, even when accounting for those baseline harms. This includes rooflines which play an important role in enclosing the River – contrary to LP4 Part B2. In the viewing area as a whole, in particular the closer views, the height and scale, as expressed in its mass, would form an overbearing abutment to the River Thames, failing to protect the open quality of the river, its views, and in places further east along the Chelsea Reach, would contribute to a canyon effect. This is contrary to D9 Part Cf and LP4 Part B7/10. Its lighting, namely when viewed in contrast with the iconic architectural lighting of Albert Bridge after dark, would jar and undermine it, contrary to LP4 Part B12.

- 3.170 This harmful visual dominance would rupture, rather than seek to reinforce, an established spatial hierarchy along the river corridor which is focused on the open pre-eminence of the River Thames, its landmark crossings in Albert and Battersea Bridges, whilst diminishing its historical relationship with riverside landmarks and their associated finer-grain, human-scaled, verdant and consistent datum variation of its skyline. Thus, the proposal fails to reinforce spatial hierarchy, aid legibility and would fail to positively contribute to the area's character, contrary to D9 Part Cb/d and LP4 Part B7.
- 3.171 This harm is, in general, standalone, in particular from Albert Bridge upstream – compounding harms in the form of some existing modern towers. Sound evidence base underpinning up-to-date Development Plans - on both embankments - have found that taller modern towers have detracted from and undermined spatial character - whilst seeking to avoid these precedents. Whilst on the RBKC side no significant change is anticipated to this important riparian frontage across the Plan period – positive change is explicitly anticipated and provided in this corridor by the Wandsworth UDS (CD5.16). As demonstrated in this evidence, the approach to heights in the tall building and mid-rise zones is underpinned by sound spatial character logic. Its overall strategic approach for Character Area B2, to stitch and mend, expressed as ‘restore’ and ‘improve’, seeks to build on the character of ‘old town’ Battersea, whilst demonstrably responding to the important aspect, openness and views on and across the River Thames.
- 3.172 Landside, the spatial character impacts are similarly significant. On the Battersea side, from Character Areas B2 and B1, the Appeal Scheme's excessive height and scale would have overwhelming, dominant and discordant impacts. These would stem in particular from main approaches whereby the Appeal Scheme would also result in a substantial interruption of the local skyline, a rupturing of the local spatial hierarchy and a failure to transition down to an appropriate scale in a manner which, similarly, would further truncate and fragment a mediated, consistently lower-scale spatial character. From the Chelsea side, consistent, coherent and authentic spatial character would be impinged and diluted.
- 3.173 This is expressly contrary to the longer-term, plan-led, meditated growth strategies for the relevant UDS (CD5.16) Character Areas which seek to restore historic settings and

create landmarks which a proportionate and whose height does not overwhelm the human scale and existing landmark buildings.

3.174 Overall, the Appeal Scheme would impose clear, incongruous transformative change on the local area, on both sides of the River. This is in the context of up-to-date Local Plan's have clear growth strategies which seek to avoid cumulative harms which have diminished local spatial character - engendering growth which would restore and improve that character. The Appeal Scheme's excessive height and scale, within an established local spatial character that is predominantly low-rise, would delivering incongruous transformative change that, considered together, would cause substantial harm to spatial character. The Appeal Scheme would fail to accord with Development Plan Policies D9 and LP4 and relevant design policies contained in the NPPF.

4.) Main Issue b) - Heritage Assets

- 4.1 Impacts on the heritage significance of heritage assets are set out under the correct procedure in **Appendix 1**. This is tabulated for ease of reference and can be read alongside the visual analysis which is the main part of this Proof. The intent is to ensure that the impacts on the spatial character are not conflated with heritage significance impacts.
- 4.2 These harmful impacts are a matter of considerable importance and great weight in accordance with the NPPF (para 212) and, where relevant, s.66 of the Town Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.3 There are clear differences between the LPA and the Appellant on heritage impacts which are laid bare in the Topic Specific Heritage Statement of Common Ground, and again at **Appendix 1**. However, in main evidence I address and draw the Inspector's attention to the following two matters:
- The Appellant's treatment of setting and;
 - The matter of 'heritage benefits', which are claimed by the Appellant in relation to Battersea Bridge, at least.

Appellant's Treatment of Setting:

- 4.4 I would like to draw attention to the Appellant's approach to assessing the contribution of elements of setting to significance and the baseline cumulative impacts, which I do not accept. This can be placed in contrast to our assessment.
- 4.5 By way of good example, Albert and Battersea Bridges as broadly representative of the Appellant's approach. The Appellant, at paras 5.176 / 5.208 of the BHTVIA, found the setting of Albert Bridge / Battersea Bridges makes a 'strong' / 'integral' contribution to significance. This is common ground with the Appellant, at least in relation their consideration of Albert Bridge, that the bridge forms an integral part of the Chelsea

Embankment, has a relationship with Battersea Park and that both bridges share a group value and with the Thames Conservation Area.

- 4.6 However, in the Appellant's impact assessments (paras 8.68-8.75 / 8.84-8.91), any clear or balanced assessment as to the impact on these relationships is absent. Instead, the Appellant engages in advancing a selective, descriptive relationship with setting, focused on the presence of other tall buildings, distant and nearer – whilst ignoring its acknowledged positive relationship of a finer-grain, smaller-scale, near contemporaneous historic environment. For example, in relation to Albert Bridge, such generalised selective statements/assertions of incomplete fact state: 'the wider setting of the bridge is defined by the proximity of tall developments, both to the east and west. The towers of Vauxhall, Nine Elms and Battersea are visible to the east, while the tall developments along Chelsea river frontage appear to the west. Large scale development on the Wandsworth embankment, including the Albion Riverside building, line the south bank of the river'. We are left unclear, in the opinion of the Appellant, whether these enhance or detract from significance, or whether they affect an appreciation of significance, or whether they are neutral. However, it is suggested that this changes results as making the asset more – rather than less – capable of absorbing change. It can only be inferred that, more in common with our position, that some modern taller elements have harmed this setting in baseline cumulative terms. However, this seems to have been interpreted as making the potential for harm lesser – not more. We contend this is the wrong approach.
- 4.7 The NPPF, para 013, states that LPAs may need to consider the implications of cumulative change on heritage assets. Indeed, this is considered, and explicitly acknowledged, as part of the Council's UDS (CD5.16). Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (CD4.13) requires consideration of cumulative visual impacts including where: 'the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with the NPPF policies consideration still needs to be given to whether additional change will *further* detract from, or can enhance, the significance of the asset' (para 9, bullet 1 – our emphasis).
- 4.8 In the BHTVIA (3.41) the Appellant agrees that Character Area B2 suffers from a series of awkward juxtapositions fragmenting local character, citing the example of the

Montevetro Tower. This appears to back up the inference that the assessments of impact on significance are not neutral baselines.

- 4.9 For this reason, we ask that the Inspector prefers our methodical, complete and inclusive approach to heritage impact assessment set out in **Appendix 1**. This provides a clear articulation and link between elements of setting contributing to significance and the impacts on those elements.

1 Battersea Bridge Road – A Heritage Benefits Case:

- 4.10 The Appellant's Statement of Case, under Public Benefits, at 6.8 (bullet 4), states that the Appeal Scheme would enhance the 'the settings of several designated heritage assets'. This would appear contrary to its own BHTVIA, which only advances a heritage benefit in relation to Battersea Bridge. The Appellant, in its Planning Statement, did not advance the suggested heritage benefit in its planning balance. However, for now, we shall address the Appellant's stated claim of heritage benefit in relation to Battersea Bridge.

- 4.11 The Appellant's claim (original and Addendum BHTVIA, 8.84-8.89 & 3.26/7), is that the Appeal Scheme would result in an improvement to setting through:

- Enhancements to the surrounding public realm along the riverside from where 'the asset is best appreciated', with the new public realm that 'allows viewers to fully appreciate the bridge'.
- The removal of the existing building which, 'by reason of its poor urban and architectural design', 'distracts from an appreciation of the bridge'.
- The 'landmark status of the building marking the location of the bridge'. It is noted that this is from within the 'local townscape, highlighting the position of this important receptor'.

- 4.12 I disagree that these claims, in this instance, are heritage benefits capable of balancing under paragraph 215 of the NPPF.

Urban design vs heritage public benefits – Background:

- 4.13 Benefits should flow in kind from development and can be anything which delivers on the economic, social or environmental objectives of the NPPF (paragraph 8). This can include urban design benefits and heritage benefits. They must be of a nature or scale to benefit the public at large – and in the case of heritage benefits do not need to be visible or accessible (for example, repair work). The NPPG gives three potential examples, one of which is for consideration here: ‘sustaining or enhancing the significance of a heritage asset and the contribution of its setting’ (emphasis added).
- 4.14 The focus on heritage significance is instructive. The NPPF glossary defines this as ‘the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic’. Significance derives not only from a heritage asset’s physical presence, but also from its setting’. A heritage benefit must be tied back to significance – it is not just an urban design benefit. The approach to setting is the next instructive point.
- 4.15 The definition of setting in the NPPF glossary makes a clear and important distinction: ‘elements of a setting may make a positive or negative contribution to the significance of an asset, *may effect the ability to appreciate that significance or may be neutral*’ (emphasis added). My contention is that the public realm works generally fall outside the first important category of being tied back to significance – and fall in either of the latter two: either affecting an appreciation of significance or it is neutral to significance – that is, significance doesn’t change.
- 4.16 I appreciate Inspectors have taken different positions, and it is not a settled matter, but I take that of the Inspector at the Fulham Town Hall case (ref: APP/H5390/W/15/3140593): ‘a distinction should be drawn between beneficial impact on significance and public benefit from an appreciation of it’ (para 21). He continues ‘there is a difference between how an asset is experienced and how many people experience it so that, while the appreciation of significance can be an important public benefit to be weighed in the balance required by NPPF134 [now 212], this is not a matter that alters the significance itself’ (para 32).
- 4.17 In this regard, it is common ground that the public realm works to the riverfront are capable of being a public benefit that is an urban design benefit. In plain terms, enhancing inclusive access, improved frontages and materials, are simply urban design benefits, in this instance not linked to heritage significance. The fact that new seating,

for example, may encourage more lingering for observers to better appreciate significance – it does not change significance, or advance its conservation as per the wording of paragraph 212, which is unaffected. This is important, unless significance is affected, then those benefits are urban design benefits and are not capable of being ‘netted off’ against articulated, significance-based heritage harms under a discreet so-called ‘internal heritage balance’ under NPPF paragraph 215, in my view. To be clear, it is our case that there are no heritage benefits which could be balanced under paragraph 215. And we consider it is important that benefits are not ‘double counted’ for the purpose of the overall planning balance – but are either an urban design benefit or an articulated heritage benefit.

- 4.18 The GLA’s Heritage Impact Assessment Planning Advice Note (2026) (CD5.42) is useful adopted decision-maker context to which I refer to furnish my position. It is clear that heritage benefits should be clearly distinguished from other public benefits and seeks to avoid issues of an ‘internal heritage balance’ (paras 54/74/75). Of particular consideration, I draw attention to the relevance of paragraph 54 which draws on caselaw:

‘Proposals may be of high design or architectural quality, provide an iconic marker with wayfinding benefits, provide a focal point in a view with a directional quality or consolidate or complete an existing skyline composition or cluster or contribute to the layered quality of the view. Where substantiated, such benefits may be public benefits of a design, townscape or architectural type, but do not in themselves avoid or minimise heritage harm. Architectural quality, even if outstanding, does not in and of itself avoid or minimise harm and is not a justification for harm’.

The Case Against Battersea Bridge Heritage Benefits:

Landmark marking the bridge:

- 4.19 To be clear, we don’t agree that ‘marking’ the bridge with a building of the scale and height proposed is an urban design benefit in this case, never mind a heritage benefit (see ‘Design Quality Table’, **Appendix 3**). In fact, for the same reason the Appellant

considers the proposal a heritage benefit, we contend it is a harm - that the Appeal Scheme would diminish the landmark presence of Battersea Bridge.

- 4.20 LBW's case is that Battersea Bridge has a designed, landmark presence which marks the historic river crossing, not that some site – related only by proximity otherwise unconnected historically - marks the bridge. It is not correct that in a local setting, where it forms part of the same views, a proposal to dominate and detract from the landmark bridge could possibly enhance its landmark status. The Appeal Scheme, if approved, could become associated with the location of the bridge, but we contend in negative terms for its poor relation to the bridge and river – and not be a positive association. The UDS (CD5.16) seeks remarkable landmarks – but this does not require height and scale and should not, as explicitly sought, detract from the bridge as a landmark in its own right.

Removal of a 'poor urban and architectural design':

- 4.21 We accept that good design, whilst an anticipation of the planning system, can be an urban design benefit – but only in rarer, specific circumstances is it a heritage benefit capable of a NPPF para 212/215 balance. The policy expectation of good design (NPPF, para 131) comes with it, as per the NPPF (para 135 Part C), the expectation new design be sympathetic to local character and history, of which, clearly, heritage assets are a component. But whether a design is not deemed more 'befitting', or contextual to, that local history is not a matter impacting significance, *per se*. If the Appeal Scheme proposed to replace an original/historic design feature which had been lost, or restored an architectural feature which formed an intentional (or later significant) part of a designed / historic setting – then this could enhance significance. This is plainly not the case, in this instance.
- 4.22 Whilst we don't object to the potential replacement of the present Glassmill building, or consider the existing building to be of particular architectural or historic interest, we consider it makes an overall neutral setting contribution. Whilst there are elements like the roof plant/telecommunications which undermine its skyline presence / integrity, and it is outdated as office accommodation, it is an interesting period piece with its gun-metal aluminium and reflective glass curtain walls which create impressionistic reflections. However, its main contribution is to the general openness of the River and its landmark bridges.

- 4.23 The Appellant's assessment is unclear in how they reach their conclusion that the architecture of the Appeal Site detracts from significance or an appreciation of it. However, it is our evidence that the height and scale of the replacement Appeal Scheme would demonstrably detract from Battersea Bridge, its landmark status and its open and historic relationships on the River Thames. This impact is not mitigated by detailed design or public realm provision. No amount of materials, architectural detailing, new seating, or improved accessibility will change that assessment.
- 4.24 To the extent any of the new design might be considered appropriate is an urban design matter and not a heritage benefit for the purpose of a 215 balance.

Enhancements to surrounding public realm:

- 4.25 Put plainly, LBW accepts that optimising active frontages, enhancing surface treatment, new planting, a café, accessibility improvements, etc, are most self-evidently expectant urban design benefits of a scheme of this size, or smaller. These do not affect those elements of setting which contribute to significance – and thus would not alter significance. As discussed, the creation of incidental new views, which may have more wider interest, does not change heritage significance. The Inspector in relation to 'The Tulip' case (ref: APP/K5030/W/20/3244984) in the City of London sums this up well: 'while the scheme might add more interest to some views, enhancing a view is not the same as enhancing the aspects of setting that contribute to the significance, or special interest, of a listed building' (para 14.59). In the same case, and on the matter of opening up new incidental viewing experiences, in that instance from above looking down, he added: 'I have considered the claim that looking down on the ToL (Tower of London) would also be a heritage benefit, but not even the City thought that and nor do I'. I do consider an enhanced experience when looking at a view, here of the bridge, for example from new seating, is an urban design benefit. It could even be deemed to better enhance an appreciation of significance, albeit, we content, this would be marginal and a minor moot point. But it doesn't advance the conservation of the asset to be able to advance its conservation and so is not a matter for an internal 215 balance. We consider this matter in giving weight to the public realm benefits.

Conclusion – Heritage Assets:

- 4.26 As set out in **Appendix 1**, our case is that there are clear and, in some instances, significant harms to designated and non-designated heritage assets, some of which are of the highest order. Those assets of the highest level of significance should be afforded elevated great weight under the NPPF paragraph 212 – ‘the more important the asset, the greater the weight should be’.
- 4.27 The overall heritage planning balance is not for me and is undertaken in the planning evidence of Ms Chambers.
- 4.28 For the reasons set out above, however, I disagree with the Appellant’s case that the Appeal Scheme would result in specific heritage benefits (to Battersea Bridge), over-and-above common ground urban design benefits, for the purpose of any 215 internal balance. Should there be disagreement, then the heritage benefits to significance should be articulated and differentiated from the urban design benefits, so as not to be double counted in the overall planning balance.

5.) Design Quality:

- 5.1 The Council's case does not seek dismissal of the appeal by reference to detailed architectural matters; the Council's concerns derive from height and scale. We have considered the detailed architectural expression and assert that this does not remove the substantial harm to spatial character by virtue of the height and scale. It is our position that the proposal can't be said to accord with the NPPF's requirement for 'high-quality, beautiful and sustainable buildings and places'. It is our case that the height and scale of the Appeal Scheme is so injurious to spatial character that it would fail para 135 of the NPPF, namely, the need to ensure development is 'sympathetic to local character and history, including the surrounding built environment and landscape setting'.
- 5.2 No other expert, independent observers on the Appeal Scheme have suggested the Appeal Scheme is of 'exemplary design', or some other variant to the same effect.
- 5.3 It is a matter of common ground that the views of Wandsworth's Design Review Panel (WDRP) should be given weight, in accordance with the NPPF (para 138). In accordance with Policy D4 Part D, the proposals have been thoroughly scrutinised by borough and GLA planning, urban design and conservation officers, whilst taking expert advice at two design reviews by the WDRP. The WDRP, albeit in relation to the taller 38 and the slightly taller 33 storey iterations, made its formal advice in letters dated 11 January and 6 March 2024. It is a matter of common ground that the independent and expert WDRP process accorded with Policy D4 Part E1-6, and thus this advice should be given full weight. The Panel comprised leading experts in the relevant fields of architecture, landscape, planning and heritage.
- 5.4 The Appellant makes the case is that the design moves beyond straightforward policy requirements for high-quality design and is advancing a case that the design is 'exemplary', or in other words perhaps, 'outstanding'. The BHTVIA (Table 3.2) suggests the Appellant consider NPPF paragraph 139 is engaged and supports the Appeal Scheme. It is worth of note, this is not followed up in the Appellant's Planning Statement responsible for balancing matters. However, I will tackle this head-on.
- 5.5 **Appendix 3** tabulates a response to the Appellant's various component claims to such 'exemplary' design found in the Appellant's case to date. As proper context, it sets out

our views in the context of those of the other independent design experts, the WDRP and the GLA. Whilst those observations related to different iterations of the same scheme, we still consider these relevant.

- 5.6 In summary of Appendix 3, we the claim the Appeal Scheme would ‘mark’ the location of Battersea Bridge in any wider visibility would be limited and a peripheral matter. Any positive association would be nullified by the harm caused to spatial character, not least, its subjugation of the real riparian landmark – the bridge itself. It is our case that the proposal would not form part of any successful cluster or wider skyline – but would compound baseline cumulative harm and diminish present skyline relationships. It is also our case that no aspirational detailed architectural matters come close to dealing with the substantial harm to spatial character by virtue of height and scale, such are foundational design matters.
- 5.7 I draw support from the Inspector’s conclusion in relation to the dismissal of the tower at New City Court, London Borough of Southwark (Appeal Ref: APP/A5840/W/22/3290473 (amongst others), paras 13.34/35) found that, whilst there were some commendable aspects in architectural / public realm terms - ‘good design cannot exist in a vacuum’. In dismissing the scheme, she established that ‘context is a key aspect of good design’ (13.34). The Secretary of State agreed with her assertion that – despite some positives - the harm (to heritage and character) was as such that ‘the schemes cannot be said to be exceptional, or exemplary’ (para 13.198).
- 5.8 It is our case that the underpinning design fundamentals, namely its relative height and scale, drive the substantial harm to spatial character.
- 5.9 What is apparent in the Appellant’s design response is the lack of grappling with the adopted Council’s UDS (CD5.16) – though it is common ground that this evidence base underpins the Plan-led approach of the Council’s young Local Plan. In fact, there is not a single mention of it in the whole 149 pages of the Design and Access Statement. In contrast, our character and heritage evidence in this Proof addresses this Plan-led approach directly and as integral.
- 5.10 If the Appellant advances a claim under NPPF para 139 (b), that the Appeal Scheme is of ‘outstanding or innovative designs which promote high levels of sustainability, or helps raise the standard of design more generally in an area’ – then we make the case that there is nothing apparently innovative or of an unusual high-level of sustainability.

However, we'd draw attention to the essential clause, that is: 'so long as they fit in with the overall form and layout of their surroundings'. We contend, in relation to the latter, the Appeal Scheme would significantly harm spatial character and thus fail this essential caveat.

Conclusion - Design Quality:

5.11 In summary, although the Council does not seek dismissal of the appeal by reference to matters of detailed design, I refute the Appellant's claim to 'exemplary design', and that this could move beyond mere compliance with isolated elements of design policy. We contend that the height and scale of the Appeal Scheme, as design fundamentals, run contrary to the NPPF requirement for 'high quality, beautiful and sustainable buildings and places' (NPPF; para 131), as a standard. Aspects such as materials and detailing can't simply be divorced from the big picture – that is height and scale – and these should have driven the design approach.

6.) Summary and Conclusion:

- 6.1 Neither I nor the Council objects, as a matter of principle, to tall buildings, or their role London's evolving character. However, I'm also very aware of the harm these can cause to London's historic, lower-rise and landscape spatial character. My evidence sets out in detail the far-reaching spatial character and heritage harms identified in the Officer Report to Committee.
- 6.2 In my professional opinion, the Appeal Scheme would cause substantial harm to local spatial character, including this special part of the Capital's inner-west centred on the Chelsea and Battersea Reach of the Capital's premier natural asset, the River Thames. This river corridor, and its distinctive local spatial character and heritage, which has evolved over centuries, is of a great value to London and the local area. This evidence sets out how this spatial character would be substantially undermined. It makes clear that there are existing relatively modern aspects which have diminished this spatial character and heritage. However, even in this context, the Appeal Scheme would represent an alien scale which would seriously compound that harm. Its height and scale are so excessive that it would dominate and overwhelm spatial character and unduly represent the most visually conspicuous intrusion in this context.
- 6.3 My evidence makes clear that this harm is anticipated by the up-to-date Local Plan and, in fact, is very expressly contrary to its Plan-led, design-led approach to accommodating height and growth. In line with the Plan's foundational Urban Design Study (2021), Character Area B1 (Battersea Riverside), which includes the Appal Site, is evolving in the manner intended. Its strategy seeks to 'restore' and 'improve' its sensitive riverside character – not rupture and denigrate it - which the Appeal Scheme, we contend, would.
- 6.4 The height and scale of the Appeal Scheme would also cause significant harm to the heritage significance heritage assets, including a number of those of the highest order. Given the specifics of the impacts, and the intrinsic significance of the assets, these – the in-direct impacts would lead to 'less than substantial' harms in NPPF parlance, between the lower and middle of a broad spectrum. I contend that there are no aspects of the scheme design which would enhance any significance of any heritage asset. It

follows that there are no heritage benefits capable of a balance against those NPPF harms.

- 6.5 The Appellant seeks to claim that there is a particular architectural quality termed exceptional, exemplary, or some variant thereof, which in of itself is a public benefit to be given weight under the NPPF. Our case is that the height and scale of any piece of architecture are design fundamentals – they are structural design matters. These are unacceptable and thus the overall design is harmful, as we have made clear. Our case is that matters of detailed design and expression can be unobjectionable – even attractive – and in isolation supported. However, when considered as a whole, including by reference to height and scale, the design is unacceptable. It is certainly not exceptional
- 6.6 We note that neither the Council’s expert Design Review Panel or the GLA suggested the design was exemplary or even come close to such an assertion. In fact, both expressed disappointment at aspect of the architecture and public realm – whilst finding significant levels of harm. Our case does not rely on aspirational levels of detail, which we would otherwise reserve for condition – but is that the harms caused by the height and scale are too great, that the proposal could not, in fact, meet D9’s or the NPPF’s requirement that design be high-quality, even exemplary (D9 Part C1c). We feel these structural harms go to the heart of the design quality and mean the proposal is not good design and is contrary to the NPPF para 135 (c) which requires all development be: ‘sympathetic to local character and history, including the surrounding built environment and landscape setting’.
- 6.7 It runs clearly, then, that the Appeal Scheme could not demonstrate compliance with NPPF pars 139 (b), even prior to reaching its essential clause that it must, in any case, fit in with the overall form and layout of their surroundings. This, it is my view, that the NPPF para 139 is triggered and that is that ‘development that is not well-designed should be refused, especially where it fails to reflect local design policies and government guidance on design’. In addition to this, the Appeal Scheme would conflict with London Plan policy D9 and LP4 and PM9.

The Wandsworth Design Review Panel comprised Deborah Nagan (Landscape Architect, Partner, Nagan Johnson Architects & a Mayor's Design Advocate), Prisca Thielmann (Architect, Director, Maccreanor Lavington Architects, Paul Crisp (Director, Heritage, Smith Jenkins & Heritage), Jason Cornish (Architect, Partner, Feilden Clegg Bradley Studios) and Marcus Claridge (Architect, Claridge Architects).

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