

Royal Borough of Kensington and Chelsea

Lots Road South Draft Design Brief Consultation

March 2022

Responses to Consultation

The table below sets out the responses received on the Lots Road South Draft Design Brief consultation which was undertaken for six weeks between 24 January to 06 March 2022. The last column sets out the Council's response to the points raised and areas where the text will be changed in the final Lots Road South Design Brief. The changed/intended to change text is shown in [blue](#).

Q1: Do you have any comments to make on the Lots Road South Draft Design Brief?

No	Respondent Name	Comments	Council's response
1	Charles Donlan	<p>I am writing as requested in response to your consultation on the Lots Road South draft design brief, published on 24th January 2022. I'm a local resident, having lived in Stadium Street for 13 years.</p> <p>I share the view with almost everyone else I have spoken to on this subject to support the concept of the regeneration of the Lots Road South site, enhancing the social and economic development of our area is important to the Lots Road Area. As the only dedicated Employment Zone in Chelsea it has the potential to play an important role in the economy of our part of the borough and more widely in London, bringing new jobs and skills for those living and studying in the area. I hope my comments and objections to the draft brief will therefore be seen not as an opposition to development, but as a call for the brief to reflect the nature of the Employment Zone and the Policy Planning Context as set out on page 8 of the draft design brief. Turning to my objections in more detail:</p>	Noted.

		<p>The Consultation Process - I feel that your claims to have drawn up this brief through consultation with the local community are not accurate. Having read the reports of the September and December workshops these would appear to have been small in scale, highly selective in attendees and largely ignored when it came to either summing up responses or incorporating their views into this design brief. I am building quite a weight of evidence of attempts by RBKC to be selective in its consultations, to ask leading questions and to misrepresent the views of consultees. Apart from falling below the standards required by those in public administration, it ultimately leads to a break down in trust between the Council and local residents and businesses.</p> <p>Where local campaigns succeed in overcoming unsatisfactory consultations it also leads to a waste in precious public resources. I hope we have an opportunity to discuss how future consultations can be fairer, more transparent and more respectful of local concerns. Equally the Facebook Consultations are skewed with weighted questions and are not impartial.</p> <p>I understand from those that did attend that the RBKC representatives refused to discuss:</p> <ul style="list-style-type: none"> • The appropriateness of such a large volume of housing in an Employment Zone • Proposed density of the proposals • Viability Study undertaken for the proposals • Result of negotiations with Hammersmith and Fulham • Nature of the remaining employment/commercial uses • Contribution to the cost of the Care Home from the sale of Thamesmead 	<p>Noted. We will amend the design brief to include more information about the multistage early engagement process. On page 7 we will add the text in blue:</p> <p>“The principles in this document were established with the local community through a multistage early engagement process in line with the Council’s Planning Statement of Community Involvement and the Charter for Public Participation. The process spanned March to November 2021 and involved over 20 local organisations and businesses. Initially, local residents’ organisations, community groups and businesses were invited to discuss a vision for the whole neighbourhood, as set out in the “Lots Road Mapping Workshops: Summary of Feedback” document. Some stakeholders chose to carry on participating by taking part in a working group focused on the Lots Road South site, as explained in the “Lots Road South Design Workshops: Summary of</p>
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		<p>Care Home site</p> <p>The reluctance to address these issues makes this initial consultation further flawed in my eyes and in the interests of fair-play demands a re-run with a proper open discussion to ensure proper information is shared between RBKC and the Residents who's views you represent and wishes you want to respect I understand in the Consultations (which as I and a large number of local residents were not aware of) that the overwhelming view expressed by those there was that no more housing was wanted in the area. It already has the largest content of affordable housing in the Borough. Concern was expressed that the Employment Zone was essential to the area and that would be reflected in the ratio of the quantity of housing proposed. The project should be 'Employment led' as previously stated by the Council. Commitments given by the Council 'could not be relied upon'. The 'Consultations' were 'show and tell' exercises, rather than an examination of the community's needs.</p>	<p>Feedback". The two separate engagement reports covering all phases of early engagement are published alongside this design brief.</p> <p>The business of the design working group was to review emerging development scenarios..."</p> <p>"Key-points design concerns were raised by the design working group regarding the following design principles:</p> <ul style="list-style-type: none"> • Character • Massing and layout • Uses • Workspaces • Servicing and movement • Open spaces and Chelsea Creek • Greening and sustainability <p>Other non-design themes concerns raised at the workshops by the design working group and at mapping workshops included:</p> <ul style="list-style-type: none"> • The importance of the Employment Zone the site sits within • Community infrastructure • Density and height • Environmental impact
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			<ul style="list-style-type: none">• Local opposition to additional housing apart from the extra care accommodation• Remedy loss of community space• New pedestrian connection across the railway is controversial <p>The feedback summary aimed at capturing all topics discussed at the workshops. There are clear references to the community's perceived clash between employment and residential uses, that the latter should be minimum only to enhance the employment use, and that other areas may be more suited for social housing considering the existing proportion of such accommodation in Chelsea Riverside ward. The mapping workshops report also clearly states the Lots Village Association's rejection of "any additional residential buildings". Therefore, the reports do capture that members of the community oppose housing developments.</p>
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			<p>The early engagement has now been succeeded by this wider six-week formal consultation. It is expected that members of the community will have future opportunities to influence any potential project if and when a planning application is submitted to the Council.</p> <p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>It is the site allocation, rather than the design brief, which allocates a quantum of development for the site.</p>
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		<p>With regards to the Lots Road Employment Zone On Page 4 you suggest the brief should deliver a minimum of 4000 square metres of commercial floor space. I do not accept that this is consistent with the plot's designation as an Employment Zone. As you set out on Page 8 of the draft design brief, Policy CV1 sets out a vision for the borough, which includes allowing each community to fully realise its potential, stimulating improvements across the borough, ensuring development will be of a high-quality design, well integrated into its context and enhancing Employment Zones with new and improved employment floorspace and some supporting residential development providing a mix of uses and thriving centres for small businesses. Designating only 4000 square metres of commercial floor space is insufficient to allow the potential of Employment Zone and our community to realise its full potential. This amount of space will not create a sufficient draw for new businesses or allow us the possibility of attracting the high value design businesses that Policy CV1 envisages. In addition, Policy CV1 only foresees the possibility of 'supporting residential development'. As I am sure you are aware this only allows for residential accommodation for a workforce to enable the development of the Employment Zone. In your plans as currently drafted it would appear that this policy has been subverted and only a small amount of commercial space is being allowed to support your rationale for a significant housing development. As you set out on Page 8 of the draft design brief, Policy CV9 sets out a vision for the Lots Road/Worlds End area, which includes an aspiration for the Employment Zone to function as a centre for innovation focusing particularly on art, architecture, antiques and interior design. This aspiration cannot be met by a development that only requires 4000 square metres of commercial floorspace and of which only 2000 square metres must be provided for business use. To meet the</p>	<p>The reference to 4,000 sqm of commercial floor space is taken from adopted Local Plan Policy CA7 and is not part of the design brief itself. The site is allocated via this policy for "a mixed use development to include residential and employment floorspace" and therefore the principle of residential uses on the site is established. The design brief reflects, in principle 1, the importance of the Employment Zone in leading the character of the site development. As the design code does not specify a quantum of commercial or residential (be that market, affordable or affordable extra care) floorspace, the principles apply to varying quantum of these uses.</p>
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	<p>aspiration of CV9 would require a substantially larger commercial development, dedicated to attracting innovative, high value businesses, which may might even have the potential for some creation/manufacturing on site.</p> <p>As you set out on Page 8 pf the draft design brief, Policy CF5 sets out Borough-wide policy for development in Employment Zones. In addition, the Local Plan only allows new homes to be built within the Employment Zone when these are shown to, “support a significant uplift in both the quantity and quality of business uses on the site”. As I have said in relation to Policy CV1 the new homes planned are entirely unrelated to the uplift in the quantity and quality of business uses on the site. Firstly, the provision of a large quantity of new homes will directly impact the amount of space given over to attracting new businesses to the site, a critical factor in making the area a hub for high value innovative businesses. They will also detract from the type of business that we can attract, given that most of the floor space will be underneath large residential developments, spaces that are usually only suitable for retail tenants and even then not the high quality, high impact businesses that would make a qualitative difference to our area.</p> <p>In short, although you have set out in the design brief a number of important Planning Policies, you have chosen to ignore your own guidance both in setting an unacceptably low amount of commercial space within the development and in suggesting a large residential development that would contravene the policies concerning the Employment Zone and severely constrict the quantity and quality of new businesses coming to the area.</p> <p>With regards to Volumes and Massing your draft design brief is largely silent on this subject despite this having been a critical issue for respondents to your earlier (insufficient) public consultations.</p>	<p>The site allocation, Policy CA7, is a more specific allocation, while Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones.</p> <p>It is the site allocation, rather than the design brief, which allocates a quantum of development for the site. The document discusses on page 10 the site ownership and position. The quantum of development stated here is quoted from the Leadership Team paper and provided for information and completeness; it does not form part of the draft design brief itself.</p> <p>The draft design brief does not specify a quantum of development and therefore does not include</p>
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		<p>Specific Detailed Comments:</p> <p>As you set out on Page 8 of your draft design brief, Policy CL5 requires development to ensure good living conditions for occupants of new, existing and neighbouring buildings. You go on to claim that, during the preparation of this document, care has been taken to ensure that the suggested height and massing of development take particular care of the Arts school. Judging from the limited information that you have provided on the issue of volumes and massing, the scale of residential housing suggested on a naturally constrained site and the diagrams that were used in your earlier consultation meeting, it is clear that the developments being proposed would be highly detrimental to the world class Arts school in Lots Road. Buildings of the scale and volume they you have indicated would not only block our light from the Art School but would also lead to the Art school being significantly over-looked, an unacceptable situation for an establishment that teaches life drawing.</p>	<p>principles relating to volumes and massing. It captures a key point raised throughout the consultation relating to height of buildings on Lots Road (Principles 3 and 5)</p> <p>Principle 8 has been included in the draft design brief (Light to Heatherley School of Fine Art) to deal with this concern. It will be a matter for the designers/architects of a scheme to find a solution. It is noted that the question of overlooking has been raised which is also pertinent to ensuring the School's activities, i.e. life drawing classes, are not compromised The following change will therefore be made to draft Principle 8 (new text in blue):</p> <p>8. Light to Heatherley School of Fine Art Ensure the development does not compromise the quality of the light to Heatherley School of Fine Art north-east facing windows nor result in overlooking or a loss of privacy for rooms served by the windows.</p>
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		<p>You claim on Page 8 of your draft design brief that the Lots Road area ‘historically had important and large scale industrial and commercial activities’. Please could you provide the evidence that you are referring to? As you are no doubt aware, the only large-scale activities of which physical evidence remains are the Power Station and Wharfs of Chelsea Reach. The vast majority of the area impacted by the Lots Road South development are two and three storey late Victorian residential dwellings. Your description of the Lots Village Conservation Area is therefore highly misleading, and the design brief should therefore be rewritten to give a true account of the area. A high priority should be given to any development adhering to the volumes and heights of the existing buildings on the West side of Lots Road and the wider residential nature of the Lots Village Conservation Area.</p> <p>Page 10 – This page suggests that a Leadership Paper setting out expected elements for the development of Lots Road can override the serious issues with the brief set out above. In particular the Leadership Paper appears to have adopted positions in relation to the nature of Employment Zone and the provision of residential units that are in opposition to a number of Borough policies and the 2019 Local Plan. These positions appear to have</p>	<p>This extract is from page 10 of the Lots Village Conservation Area Appraisal. The document goes on to state, “In addition to Lots Road Power Station there was a large flour mill and saw mill on the southern boundary of the site and a number of smaller factories, breweries and warehouses.” It is agreed that this section should be edited to include description of the predominant built form, i.e. late-Victorian housing. The following text will be inserted on p8:</p> <p>The bulk of the Conservation Area is made up of stock brick terraced housing built in the 1880s. The grid pattern of streets is tightly packed with terraces that are mostly two storeys with basements.</p> <p>This information regarding the site ownership and position is included for completeness and for information. It does not form part of the design brief.</p>
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		<p>been taken without even having gone through the process of an SPD. This is a serious flaw in the draft Design Brief that should be remedied, and a new consultation should be undertaken.</p> <p>Page 23 - You set out design principles that are either incompatible with the broader direction of your design brief or require further elaboration and consultation. For example, as has been noted above the current limited amount of commercial space cannot be construed as respecting the identity of the Employment Zone. Similarly, the provision of new homes is incompatible with the commitment not to compromise the Art School. You also mention the location of taller buildings, but the document does not give a proper account of the nature of these buildings either on Page 23 or on Page 28, including their volumes and height, so that consultees and potential designers can make sense of this principle.</p> <p>Page 25 - A significant part of the site was formerly industrial. The development also borders on Chelsea Creek. No mention in the brief is made of the legal requirement for an Environmental Impact Assessment. Please could you set out your plans for this.</p> <p>I would be grateful if you provide me with the details of the tender process that you expect to use when you have finalised the Design Brief.</p>	<p>The quantum of commercial space and housing is not a matter for the design brief and is not specified in the design principles.</p> <p>The question of whether a scheme constitutes Environmental Impact Assessment development is subject to specific legislation and not a matter that can be determined via a design brief.</p> <p>The tender process will be undertaken by the Council's Social Investment and Property Team, which is separate from the Planning department. The most recent details of the tender process can be found here.</p>
2	The Chelsea Society Planning	INTRODUCTION: As a consultation document this is fundamentally flawed because it avoids providing anything more than minimal figures to reveal	The design brief is conceived as a series of challenges to the

<p>Committee (Martyn Baker)</p>	<p>the parameters of this proposed development, focusing instead on form/appearance rather than function/scale.</p> <p>PURPOSE: The numbers given are minimum space allocations, and the reference to a mixed-use development is decidedly misleading because the Council wants a predominately residential development to be superimposed on Chelsea’s only Employment Zone (see below)</p> <p>THIS IS DESPITE THE LOCAL PLAN APPROVED BY HMG IN SEPTEMBER 2019 seeking to protect Employment Zones from such inroads by adherence to POLICY CF5, with 31.3.543 laying down that “In order to ensure that business uses are maximised residential uses will only be permitted when they can be shown to be necessary to enable a SIGNIFICANT UPLIFT in business floor space. As well as being a significant uplift, this floor space must be of at least equal quality to that being re-provided WITH NO MORE RESIDENTIAL FLOORSPACE BEING PROVIDED THAN THAT NECESSARY TO ENABLE THE UPLIFTTHIS WILL NORMALLY BE ENSURED THROUGH ENSURING THAT ONLY A SMALL PROPORTION OF THE FLOORSPACE OF A GIVEN SITE IS RESIDENTIAL.” (My caps)</p> <p>The Council’s minimum proposal put forward at a recent Consultation meeting was for a huge 25,800 sqm of development for this small site in Lots Road South, with 18,000 sqm for residential and only 5,000 sqm for an undefined mix of other uses including community, medical and NHS uses as well as some commercial uses; this could mean an insignificant uplift in the existing business workspace.</p> <p>AREA CONTEXT :This text appears designed to imply that with other huge residential developments going on near Lots Road South this site is also worthy of massive over development. Yet the Council and then the Inspector opposed the excessive height/density of the proposed Power Station site. With an agreed 420 residential units being packed onto this 1.77 hectare site it will shortly make Riverside Ward by far the most densely populated ward in Chelsea. Yet what this Design Brief is now</p>	<p>designers/architects of a scheme, with each design principle having a rationale. Rather than seeking to be overly prescriptive or set minimum quantum of land uses, it is intended to allow the designers/architects flexibility to come up with creative solutions to achieve the outcomes sought by the local community, as captured in the workshops and via the consultation process.</p> <p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>It is the site allocation, rather than the design brief, which allocates a</p>
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		<p>suggesting should be built on the site of the commercial buildings so recently purchased by the Council (at 65-69 and 71-73 Lots Road South) is another 200 residential units. In view of the much smaller size of this site its population density would therefore exceed that of the Power Station!</p> <p>PLANNING POLICY CONTEXT: The defining characteristic of the Lots Village Conservation Area and Employment Zone is the exceptional intermingling of small homes, much sought after employment space, creative design studios, a famous Fine Art School, a Garden School and now an Academy. Your list of key Policies should therefore have included CF6 Creative and Cultural Businesses.</p> <p>The Local Plan 2010 sought to generate a dynamic approach to furthering the wellbeing and productivity of all those living and/or working in the Borough, with essential job generation and the protection of all forms of productive work space especially in Employment Zones being well articulated under the heading of FOSTERING VITALITY. In this decade the creation of more jobs and more job space for key workers and school leavers from the Chelsea Academy and other local schools needs even greater attention in planning terms. So on this site in Chelsea's only Employment Zone it would be retrograde to pursue the building instead of</p>	<p>quantum of development for the site.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for "a mixed use development to include residential and employment floorspace", establishing the principle of residential uses on the site. The emphasis on employment is reflected in Design Principle 1 of the draft design code.</p> <p>CF6 shall be included in the summary of key policies.</p> <p>Noted. This is beyond the scope of the design brief and the design brief applies to varying amounts of floor space of different land uses.</p>
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		<p>yet more high-end OPEN MARKET UNITS not affordable by local people but attracting still more absentee owners.</p> <p>SITE OWNERSHIP AND POSITION: The first bullet point perfectly illustrates that what is on offer is NOT A 25% INCREASE IN EXISTING EMPLOYMENT SPACE on the site. To promote on this site low employment shops and cafes would not be seriously job-generating in the way design studios and managed workspace would.</p> <p>The “views of local residents” cannot be prayed in aid of the 50% of new unaffordable homes you have not so far explained or justified. By contrast the provision of 55 affordable extra care homes for the elderly on the Pound site itself was welcomed at least five years ago by the local Residents Association as urgently needed once the Council had closed down Thamesbrook and sold the site for over £70m. This sum we earlier understood from the then Leader of the Council at a public meeting should go towards funding a replacement care home.</p> <p>DESIGN PRINCIPLES: You stop short of asserting that your 15 design principles actually emanated from those who attended your workshops when they had evidently not first been briefed on your marching orders to overdevelop a site only recently purchased privily by the Council not to</p>	<p>This section will be amended to reflect the Key Decision Report without implying there is overall support for new residential developments. Page 10 to be reworded as follows:</p> <p>Based on views of the local community and constraints set by the London Plan, options have been developed by the Council’s Social Investment and Property team. The development options seek to increase employment space and enhance the Employment Zone while delivering new homes, community facilities, landscaping and greenspace.</p> <p>The design principles did indeed emerge from the workshops, and the strong objections to what may be proposed as part of the</p>
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		<p>enhance the Employment Zone’s jobs and performance but to create many more homes.</p> <p>It is difficult to see how the “Employment Zone identity” can be “led by the employment use” when employment space could be overwhelmed by 200 housing units towering above employment space.</p> <p>Nor is it apparent how new buildings in Lots Road South can “respect the scale of existing buildings on Lots Road” particularly those opposite in the Conservation Area which you do not even mention.</p> <p>There should surely be no need for “taller buildings” provided high end housing is excluded from the site, and extra care space for the elderly is funded on a quid pro quo Thamesbrook replacement basis.</p> <p>Heatherley School should certainly be protected from loss of essential light for its key role, and all overlooking issues must be fully resolved</p>	<p>development were also recorded, including objections to large numbers of residential homes.</p> <p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>As noted above, the design principles are a series of challenges to the designer/architect of a scheme.</p> <p>It is noted that the question of overlooking has been raised which is also pertinent to ensuring the School’s activities, i.e. life drawing classes, are not compromised The following change will therefore be</p>
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3	Collette Wilkinson	The Lots Road South Design Brief, is not what this community needs or wants.	Issues and concerns about the quantum of development,

		<p>Reasons: This part of Chelsea is already one of the most densely populated areas in London. Lots Road South has always been a designated employment zone, it needs more business spaces built in scale with the existing buildings. At very close proximity to Lots Road South is the towering Lots Road Power Station Development, which will shortly bring on stream another 420 residential dwellings, so the 200 proposed extra dwellings on the Lots Road South employment zone, would lead to a cheek by jowl disaster, with far too many people squeezed into a suffocatingly small footprint, this has always been and should remain exclusively an EMPLOYMENT ZONE. At the request of the community some years ago, a number of affordable care homes were promised to be built on the Pound site, this is urgently needed. Other than that no more residential units should be allowed in the Lots Road South employment zone.</p>	<p>residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>The emphasis on employment is reflected in Design Principle 1 of the draft design code. Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for “a mixed use development to include residential and employment floorspace”, establishing the principle of residential uses on the site.</p>
4	David English (Historic England)	In our view, the draft document provides a clear sustainable and positive framework for the development of the site and sets out appropriate	

		<p>guidance to help ensure future development responds positively to its wider context and industrial, commercial history. We have only some minor comments to make:</p> <ul style="list-style-type: none"> • There are no designated heritage assets within the site boundary, but it is bounded on all sides by conservation areas. It is important that new development seeks to conserve, or where possible, enhance the setting of the conservation areas and this should be highlighted within the brief. • It is important that heights step back from Lots Road to be sensitive to the wider character of the area and to avoid the creation of a canyon like effect along the southern section of Lots Road. We are pleased to see that this is highlighted in the height principles. • We advise that the design brief expresses building heights in metres (above ground level or AOD) rather than storey heights, otherwise there is a lack of clarity as to what heights would be acceptable (often ground floor storeys are double height for instance). • When considering heights, it is important to determine what might detract from the prominence of the nearby Lots Road Power Station as a landmark. The Borough's 2022 Character Study makes this recommendation, we advise that this is transposed as guidance into the brief as part of the design principles for the site. 	<p>Noted; this is acknowledged in Design Principles 3, 4 and 5.</p> <p>Noted; this is captured in Design Principle 5.</p> <p>Noted. The design brief refers to building heights on page 17 as part of the site analysis. No heights are specified within the design brief itself.</p> <p>Noted. The following additional text shall be added on page 28 (Overall height principles) introductory text: <i>The development should not detract from the prominence of the Lots Road Power Station as a landmark.</i></p> <p>In addition, a further rationale for the design principle shall be added: <i>To ensure Lots Road Power Station retains its prominence as a landmark.</i></p>
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		<ul style="list-style-type: none"> • The site lies just outside the Chelsea Riverside Archaeological Priority Area (APA) which is one of the most archaeologically significant areas of the Borough containing multiphase archaeology dating from prehistoric times to industrial archaeology in the Chelsea Creek area. We advise that the brief is amended to make reference to potential for archaeology to be present on the site. • To support the implementation of London Plan (2021) policies related to local character and the design-led approach to planning for sites, we recently published the London Historic Character Thesaurus, and associated user guide https://historicengland.org.uk/content/docs/research/lhc-thesaurus-user-guide/. This has been designed for use by all London Boroughs. We encourage you to review and update the character assessment in the document (page 16) in line with the terms in the Thesaurus. <p>Conclusion Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	<p>Noted. However, this is a matter that would be dealt with via the planning application process and would not have a bearing on the design principles.</p> <p>For the purposes of the design brief, the classification in the draft document is considered sufficient. However, we note the Character Thesaurus for future projects.</p> <p>Noted.</p>
5	David Lloyd-Davis (Worlds End Studios)	<p>I am a Borough resident and a Director of Worlds End Studios, a business community established in Lots Road in 1976. I am an architect and am in favour of a sensitive redevelopment of the CA7 site.</p> <p>THE CONSULTATION PROCESS</p> <p>The Draft Design Brief claims to have had its principles established with the local community. This is not the case. I was a participant at the Design Workshops. The overwhelming view expressed by the attendees was that 'more housing was not wanted in the area'. It was already one of the</p>	<p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local</p>

		<p>densest areas in the Borough, with a further 140 residential units being added by the Power Station site.</p> <p>Concern was continually expressed that the Employment Zone was essential to the area and would be sublimated by the quantity of housing under consideration.</p> <p>There was also a refusal. by the Council Representatives, to discuss the proposed density of housing, the appropriateness of that quantity of housing in a designated Employment Zone, the nature of the remaining 4000sqm of 'commercial floorspace', the Viability Study undertaken and referred to, the extent of discussions (if any) held with LBHF and the contribution to the budget for the care home from the proceeds of selling Thamesmead.</p> <p>The Summery of Feedback published is also disingenuous in its treatment and recording of these issues.</p>	<p>community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>The emphasis on employment is reflected in Design Principle 1 of the draft design code.</p> <p>The feedback summary aimed to capture all topics discussed at design workshops. There are clear references to the community's perceived clash between employment and residential uses, that the latter should be minimum only to enhance the employment use, and that other areas may be more suited for social housing considering the existing proportion of such accommodation in Chelsea Riverside ward. The mapping workshops report also clearly states the Lots Village Association's</p>
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		<p>THE DRAFT DESIGN BRIEF There is little to fault in the Considerations in the Employment Zone Identity (page 24). However when read in conjunction with the associated Leadership Paper and the Lots Road South Options under Consideration, it is clearly a wish List that the Council have chosen to ignore. The local community deserve better than this.</p> <p>The Principles of Character, Greening, Heritage and the respecting the adjacent Conservation Area are not compatible with placing a minimum of 25,800sqm on a site of 1.77 hectares.</p> <p>Building Heights resulting from the density of the proposals are also glossed over, although germane to any 'Brief'.</p> <p>THE LOCAL PLAN 2019 In the current 2019 Local Plan, the value of an Employment Zone to the Community is recognised in requiring that any development must be 'Employment Led'.</p> <p>'Residential use in an Employment Zone should only be permitted when they would allow for a significant uplift in the quantity and quality of the employment space'.</p> <p>'An Employment Zone should not be jeopardised by residential use'.</p> <p>The options under consideration are incompatible with these policies.</p>	<p>rejection of “any additional residential buildings”. Therefore, the feedback reports do capture that members of the community oppose housing developments.</p> <p>The design brief is conceived as a series of challenges to the designers/architects of a scheme, with each design principle having a rationale. Rather than seeking to be overly prescriptive, it is intended to allow the designers/architects flexibility to come up with creative solutions to achieve the outcomes sought by the local community, as captured in the workshops and via the consultation process.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for “a mixed use development to include residential and employment floorspace”, establishing the principle of residential uses on the site.</p>
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		<p>THE LOCAL COMMUNITY</p> <p>The present major gulf between policy and practice is causing a great deal of upset in the Local community. It was stated and recorded at a Design Workshop that 'the Council's commitments could not be relied on', and this was the general view.</p> <p>To meet the aspirations and visions of the Brief the Council action its policy of encouraging and fostering small businesses and start-ups creating the synergy of a community. This requires space, design and consideration. There is no evidence of this in the 'Options for Consideration'.</p>	<p>The emphasis on employment is reflected in Design Principle 1 of the draft design code.</p> <p>Noted. This is outside the scope of the design brief but the results of the consultation shall be shared with the Social Investment and Property team.</p>
6	David Waddell (Cheyne Walk Trust)	<p>The Cheyne Walk Trust is a residents association of some 200 members by subscription resident on Cheyne Walk, Chelsea Embankment and adjacent roads. The Trust is concerned to maintain, protect and enhance the heritage and conservation aspects of Chelsea's riverscape and related conservation areas.</p> <p>Having attended a number of the Lots Road South Design Brief Consultation meetings, the Trust is concerned that these were not in effect true consultations since the RBKC consultation team was working to an Agenda that made no attempt to allow for discussion of major matters of concern. Major planning assumptions were presented as a fait accompli and in particular included:</p> <ul style="list-style-type: none"> • The overall mass, height and density for the development were pre-defined and excessive • As a designated Employment Zone, the scope for development for employment should be the principal requirement and not be compromised by pressures for residential use, 	<p>It is noted that it is the site allocation, rather than the design brief, which allocates a quantum of development for the site. It is further noted that the principles in the draft design brief can be applied to varying amounts of floorspace of different uses and at different densities.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses</p>

		<ul style="list-style-type: none"> • Density should be specified in terms of anticipated persons per hectare provided by employment and residential before and after scheme realisation. This should include a distinction between the increase in general employment as opposed to numbers engaged in community support services. <p>The Trust also considers and wishes to see addressed: Community Infrastructure contributions should be specified/quantified as Essential and/or Desired additions and their funding provision be identified as far as practical</p>	<p>including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for “a mixed use development to include residential and employment floorspace”, establishing the principle of residential uses on the site. The emphasis on employment is reflected in Design Principle 1 of the draft design code.</p> <p>The amount of Community Infrastructure Levy (CIL) payable depends on the quantum of development and is determined if and when planning permission is granted. Because the funds raised via CIL are pooled, it is not possible to ringfence funds raised from a particular development to pay for specific infrastructure in this way. A portion of CIL is to be spent on local priorities; this is called Neighbourhood CIL (NCIL). This is a fund the Council collects from developments and is required to be spent in consultation with local communities. Residents should</p>
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		<p>Guidance should acknowledge and specify Lots Road Conservation Area implications/constraints</p> <p>Environmental Impact Assessment — Chelsea Creek (PLA), flood risks, density of traffic and pedestrians, etc. With what TOR and when will this be undertaken and advised</p> <p>Height — Kings Rd 4/5 levels, why should this be more in Lots rd.?</p> <p>Remediation of whole site area appears to be proposed rather than only that contaminated in the area of the car pound, is this necessary?</p> <p>Light for Heatherleys studios — earlier discussion (2018) between Heatherley’s (HSCFA) and RBKC Property Officers suggested practicality of introducing a 2nd fl garden in Assisted Care Home (ACH) block adjacent North of HSCFA to avoid masking light to studios</p> <p>Green Path: Identify and reserve route from Chelsea Creek to Fulham Rd. ACH possibly could be located elsewhere in Chelsea thus reducing pressure for Res on the CA7 site.</p> <p>ACH residents' needs (garden access, to be able walk to shops etc.) should be acknowledged.</p>	<p>engage in the NCIL consultations to influence this.</p> <p>Noted; this is acknowledged in Design Principles 3, 4 and 5. The procedure for Environmental Impact Assessment, and determining whether a project is likely to have significant environmental effects, is beyond the scope of the design brief.</p> <p>Noted. No specific building heights are included in the design brief, rather overall height principles (Design Principle 5) respecting the character of the street.</p> <p>This is not a requirement of the design brief.</p> <p>Noted; Design Principle 8 is phrased such that the designers/architects would be able to respond in a number of ways to the challenge.</p> <p>Noted; see Design Principle 11. The local plan site allocation requires extra care homes as part of any site redevelopment.</p> <p>Noted; see Design Principle 14.</p>
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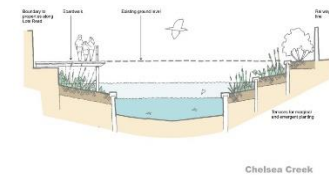
		<p>Many of these points are also addressed in the formal responses submitted by The Chelsea Society and the Lots Village Association of Residents and Businesses. The Trust wishes to support and endorse both these submissions.</p>	<p>Noted.</p>
7	<p>Demistry Lyons (Environment Agency)</p>	<p>We are pleased to see that sustainability is listed as one of the design principles and that flood risk has been recognised as an issue. The site is partly located in Flood Zone 3, which means a Flood Risk Assessment should be submitted in support of any future planning application. As part of the FRA we would also expect the developer to demonstrate that any tidal flood defences along the Chelsea Creek can be raised in line with the TE2100 plan as required by Policy Policy SI 12 of the London Plan. To accomplish this we would normally require a 16 metre buffer to be provided from the outer edge of these flood defences (including any buried elements such as any anchor rods or blocks) so that they can be raised at a later date. The applicant would also need to demonstrate that the design life of the flood defence is commensurate to the lifetime of the development as required by paragraphs 152 to 173 of the National Planning Policy Framework, which is available at https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change. In order to do this the developer may need to repair or replace the flood defence.</p>	<p>It is noted that a Flood Risk Assessment should be submitted with a planning application; this is a requirement for validation of a planning application of this type and therefore it is not necessary to include this in the design brief. The specific requirement in the London Plan in relation to raising flood defences in line with the TE2100 plan is a pertinent issue to this site and should be factored into any design proposal and landscape strategy. The following changes to the design brief will therefore be made:</p> <ul style="list-style-type: none"> • On page 9 – replace first two paragraphs under sub-heading ‘Flooding’ with the following text: <p>The site lies in Flood Zone 3 of the River Thames and is shown to benefit from flood defences. Planning applications here will need to be supported by a site-specific Flood Risk Assessment</p>

			<p>that considers the risk of flooding from all sources, including a breach of the tidal flood defences, both now and in the future due to climate change. Proposals will need to demonstrate alignment with the requirements of the TE2100 Plan for the raising/replacement of existing flood defences. An Exception Test Assessment will be required, as well as a Drainage Strategy to show how surface water will be managed in a sustainable way.</p> <ul style="list-style-type: none">• On page 33, the following introductory text to be added: “The Thames Estuary 2100 (TE2100) Plan sets out how the Environment Agency and partners can work together to manage tidal flood risk in the Thames Estuary. The development should demonstrate an analysis of flood defence levels and incorporate future proofing measures to raise the defences in line with the TE2100 plan.
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Mandatory biodiversity net gain as set out in the latest Environment Act and is likely to become law in 2023. With this in mind the developer

Such measures should be considered as part of the overall landscape strategy for the site. For instance, any proposed public realm adjacent to the creek could be elevated to take account of future flood events.”

- On page 33, the following rationale to be added to the design principle 10: “To futureproof the development and flood defences in line with the TE2100 plan”
- On page 33, include a diagram showing a suggested approach to integrating raised flood levels into the landscape strategy – extract from section 6.7 of [Thames Strategy - Kew to Chelsea](#)



Noted; biodiversity net gain is dealt with by the Environment Act and it

		<p>should seek to protect and enhance the local environment and seek opportunities to enhance ecology. Therefore biodiversity net gain should be achieved on this site. As this site includes a section of watercourse (Chelsea Creek) within the redline boundary we would expect the applicant to submit an aquatic biodiversity net gain strategy to improve biodiversity adjacent to this watercourse. Estuary Edges (https://www.estuaryedges.co.uk/) contains a number of design options which we would expect applicants to explore. This is supported by 'Protecting and enhancing London's waterways' Policy SI 17 of the London Plan and paragraph 174 of the NPPF. Biodiversity net gain is also a requirement of policy G16 of Kensington and Chelsea's emerging local plan.</p> <p>Finally the applicant would need to minimise light spill into the Chelsea Creek and demonstrate that overshadowing would not have a negative impact on this watercourse.</p>	<p>is therefore not necessary to require this in the design brief.</p> <p>Noted. The following text (in blue) shall be added to the introductory text for Design Principle 10 on page 33 of the design brief: The development should minimise light spill into the Chelsea Creek and demonstrate that overshadowing would not have a negative impact on this watercourse.</p>
8	Gillian Best	<p>"We have done a survey of brown field and infill sites across the borough and have identified potential space for thousands of new homes."</p> <p>That was in a speech to the full Council, on 17th October 2018 by Kim Taylor-Smith, the Deputy Leader, Grenfell, Housing and Social Investment. Formal statistics show that the population in the Chelsea Riverside Ward is the third highest in the borough, The majority of this population density is</p>	<p>Planning policy for Affordable Housing applies to all developments at a borough-wide level and does not vary by area or ward. The overall percentage and mix of Affordable Housing for this site is outside the scope of the design</p>

	<p>crammed in the area west of Beaufort Street. Further, social rented properties in the borough and London account for 24.5 and 24.1 per cent respectively but is 41.3 per cent in Chelsea Riverside</p> <p>For most of this century, the hemmed in nature of Lots Village Chelsea bordered by the river, railway line and Kings Road, has been a concentrated building site with four major developments – the new Academy School, the new Heatherley’s building, the Lots Road Power Station Development and the work to the London wide super sewer project. The latter two are not scheduled for completion until 2023 with all the continuing problems of major disruption for the community, and of course significantly heightened pollution levels – some of the highest in the Borough.</p> <p>Now we are told the Council plans two further major developments for the area, of the Cheyne nursery site (which has mysteriously gone quiet since the significant residential opposition last summer) but in particular extensive development of Lots Road South – an area up which until now has been exclusively part of the employment zone and not residential at all.</p> <p>In fairness, several years ago we were informed that a care home replacing Thamesbrooke was to be built on the car pound using the £78m. the Council had received for the sale of that facility off Kings Road. It was a proposal that was approved in general by the local community. Although a care home is included in the new plans for the whole development it is subsumed to an inferior part of the site, leaving the prime area to private homes.</p> <p>In conclusion, appreciating the pressure on the Council to meet imposed housing obligations, could the planners take an objective view of what this local community have endured so far this century by way of polluting</p>	<p>brief and is a matter of planning policy, assessed at planning application stage.</p> <p>The amount of construction in the immediate area that has been endured by residents, and is ongoing, is noted. Control of site construction nuisance and disturbance is outside the scope of the design brief but would be dealt with through the planning process, for example via a construction management plan.</p> <p>Noted. The quantum of different land uses (such as residential) is not specified in the draft design brief and is outside its scope. The resistance expressed by members of the local community with regard to a high quantum of residential compared to employment floorspace was noted in the workshop records. The proposed</p>
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		<p>major developments, coupled with the statistics of existing high population levels. There is a viable alternative for them and that is taking advantage of the other brown field and infill sites identified by Kim Taylor-Smith which would more than meet their commitments.</p> <p>For the put-upon residents of the area, this would fulfil Kim Taylor-Smith's promise of what he's also on record as saying: "our residents are at the centre of everything we do".</p>	<p>design principles apply to varying quantum of uses.</p> <p>This site has been through the local plan process and has been allocated in the adopted local plan (2019) for employment and residential uses. The constrained and built-up nature of the borough means there are very limited sites with opportunity for development.</p>
9	Hallie Swanson (Cheyne Walk Trust)	<p>The concept ticks a lot of the right boxes, but as it is presented seems more conceptual than concrete at this stage so it's hard to judge. It's commendable that the design brief is trying to make sure important things like keeping Heatherleys studios from having their light blocked and adding green space and blocking high rise buildings--all excellent--are made part of the plan. This should help later at the planning permission stage if developers go off-piste.</p> <p>I think the council needs to pay close attention to what the Lots Road resident's associations think and take their cues from them.</p>	<p>Noted. The design brief is conceived as a series of challenges to the designers/architects of a scheme, with each design principle having a rationale. Rather than seeking to be overly prescriptive, it is intended to allow the designers/architects flexibility to come up with creative solutions to achieve the outcomes sought by the local community, as captured in the workshops and via the consultation process.</p> <p>Noted. The guidelines in the Draft Design Brief were developed with residents' associations through a multistage early engagement process that span from March to</p>

			November 2021, as described in the two summaries of feedback.
10	Veronica Ricks (Heatherley's School of Fine Art)	<p>Policy CL5 notes that 'care has been taken to ensure suggested height and massing of development takes particular care of the Art School to the north.' It is essential to the art education that Heatherley's provides for our students, that privacy and natural light to studios is not compromised by the height of proposed development adjacent to the school.</p> <p>Policy CF5 states that the Local Plan only allows new homes to be built within the employment zone when shown to 'support a significant uplift' in both the quantity and quality of business uses on the site. The number of saleable residential units added to affordable homes proposed would appear to be out of proportion to any uplift to the Employment zone.</p>	<p>Noted; this is reflected in Design Principle 8 of the draft design brief.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for "a mixed use development to include residential and employment floorspace". The quantum of different land uses (such as residential) is not specified in the draft design brief and is outside its scope. The resistance expressed by members of the local community with regard to a high quantum of residential compared to employment floorspace was noted in the workshop records. The proposed design principles apply to varying quantum of uses.</p>
11	Jo Sherrard	1. Consultation process - This was not as thorough as your Review makes out. Where was the viability study for these proposals in an area which is already one of the most densely populated in the Borough? We still are	Issues and concerns about the quantum of development, residential use in an Employment

		<p>unaware of the proposed density for the site. The mix of residential to commercial in this employment zone is inappropriate, particularly on this relatively small site. You have mentioned a minimum of 165 residential units - that is a huge amount when taking into account this is an employment zone which needs to be upheld and protected. Employment Zones "should not be jeopardised by residential use"</p> <p>2. From reading the Design Brief it appears that no credit has been given to the views expressed by the majority of those who attended the consultations. Overwhelmingly it was stated that NO MORE HOUSING was wanted in the area, apart from the 55 Affordable Care Home Facility which should be placed in the best position in order to make it a properly decent facility. This area already has about the largest affordable housing provision in the Borough and there are 420 units coming on stream at the Lots Road Power Station. We do not feel the Consultations actually listened to or even heard our wishes and aspirations for the area. There is a strong feeling that the Council just rides roughshod over the wishes of the community, which is not good.</p>	<p>zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>The feedback summary aimed at capturing all topics discussed at design workshops. There are clear references to the community's perceived clash between employment and residential uses, that the latter should be minimum only to enhance the employment use, and that other areas may be more suited for social housing considering the existing proportion of such accommodation in Chelsea Riverside ward. The mapping workshops report also clearly states the Lots Village Association's rejection of "any additional residential buildings". Therefore,</p>
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		<p>3. You say - Design Policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding of each area's characteristics but you are considering buildings of 6 or more storeys high which will overshadow the east side of Lots Road and also the wider community of mainly Victorian dwellings in a Conservation Area. This does not reflect anything stated by the local community at any of the consultations.</p> <p>4. Design Principles - No.3 states - Series of buildings along Lots Road with modest variation in form rather than a uniform block, at a height that respects the scale of existing buildings on Lots Road. As you will be aware all the buildings opposite the site are 2/3 storeys high and, as stated above, the bulk of the area is made up of Victorian terraced houses. Please do not allow these massive buildings, as have been proposed to us, to be built. We do not wish to be overlooked and overshadowed in this way.</p> <p>5. Other Points - at no stage do you mention the change in people's living requirements since the pandemic. More people are working from home - at least some of the time – or using small studio type offices/units. The latter is what we are renowned for here with Worlds End Studios and Fairbank - this is what people are looking for - good light, bright and airy units with access to outside space. These should also be affordable. It is not appropriate, on this relatively small site, to build a mass of residential units in an employment zone. We keep hearing that you wish to achieve a</p>	<p>the feedback reports do capture that members of the community oppose housing developments.</p> <p>The reference to six storeys is taken from the New Local Plan Review Draft Policy SA6 and is not part of the design brief itself. No specific building heights are included in the design brief, rather overall height principles (Design Principle 5) respecting the character of the street.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for “a mixed use development to include residential and employment floorspace”. The quantum of different land uses</p>
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		<p>"build back better" policy but this will be an impossibility if you continue to build flats with no outside space in high rise buildings. Since the pandemic people would prefer to live further out and have some space - this is happening more and more. London has become too expensive for so many and particularly here in RBKC. If the council really wishes to do something good maybe it needs to be a bit philanthropic and not make money out of every development it does.</p> <p>5. This area already houses the Chelsea Academy with its 1200 or more students, the Lots Road Power Station development will also bring a large number of residents into the area and we do not have sufficient infrastructure to accommodate even more residents. Lots Road is a very narrow street and very busy and - if you wish this area to remain an attractive part of K & C to live in and to contribute to the Borough's capabilities for employment then please think again and listen to those who live and work here. We know what it is like.</p>	<p>(such as residential) is not specified in the draft design brief and is outside its scope. The resistance expressed by members of the local community with regard to a high quantum of residential compared to employment floorspace was noted in the workshop records. The proposed design principles apply to varying quantum of uses.</p> <p>Planning policy for Affordable Housing applies to all developments at a borough-wide level and does not vary by area or ward. The overall percentage and mix of Affordable Housing for this site is outside the scope of the design brief and is a matter of planning policy, assessed at planning application stage.</p> <p>Noted, the affordable housing policy aims to help achieve more affordable homes for residents in the borough. Private outside space for the residential units is a policy requirement.</p>
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			<p>This site has been through the local plan process and has been allocated in the adopted local plan (2019) for employment and residential uses. The constrained and built-up nature of the borough means there are very limited sites with opportunity for development.</p> <p>Any additional necessary infrastructure will need to be dealt with at the application stage. The Design brief deals only with matters of design taking into consideration the site allocation.</p>
12	Joshua Lee	<p>Whilst it is understood and agreed to make the most of space available within Central London, what is being proposed is completely out of scope and size with the local area.</p> <p>Following a consultation meeting on the 25th November 2021, two bits of material information were confirmed.</p> <p>1) It is proposed that a total of 200 residential units are to be included.</p> <p>2) A major portion of the commercial space is proposed to be at basement level.</p> <p>Addressing the first point, adding a further 200 residential units to an area that already has another large new development in the works Chelsea Waterfront/ Lots Road Power station (approx. 706 units) will certainly put a further added strain to the local infrastructure (public transport and roads).</p>	<p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed</p>

		<p>The proposed density of residential units also I understand works out to be higher than that of Lots Road Power Station and so surely makes this proposal unreasonable.</p> <p>On the second point, the employment/ commercial space being suggested to be located mostly in the basement is likely to surely reduce the number of business types that the space could be useful/ attractive for. As such it is hard to see how the proposal is in anyway 'enhancing' the current employment zone, if anything it does the opposite.</p> <p>Also with the proposed design for the commercial space amounting to about 5,000m², that only provides an increase of 25%. I cannot see how the focus of the redevelopment is weighted towards the enhancing of the employment zone when the area will be far outweighed by the total area of residential units being included.</p> <p>Finally as a resident that will be facing directly onto the proposed development, I have serious real concerns over the likely considerable disruption, pollution and overshadowing that the project and design will create.</p>	<p>design principles apply to varying quantum of these uses.</p> <p>Any additional necessary infrastructure will need to be dealt with at the application stage. The Design brief deals only with matters of design taking into consideration the site allocation.</p> <p>Whilst options were discussed the design brief does not allocate where on the site or how much of any land use should be at basement level. This will be down to a future architect to design bearing in mind the principles within the design code.</p> <p>Density is measured in a variety of different ways and the design code does not address any final figures.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for "a mixed use development to include residential and employment floorspace". The</p>
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			<p>quantum of different land uses (such as residential) is not specified in the draft design brief and is outside its scope. The resistance expressed by members of the local community with regard to a high quantum of residential compared to employment floorspace was noted in the workshop records. The proposed design principles apply to varying quantum of uses.</p> <p>Any planning application that comes forward for the site will be required to have an accompanying CTMP (Construction Traffic Management Plan) and CMP (Construction Management Plan) that will deal with construction traffic as well as construction methods and noise and pollution as a result of construction. The application will need to also ensure acceptable levels of daylight/sunlight to surrounding existing development.</p>
13	Kerry Davis-Head	Note: <i>Text quoted from documents in the Lots Road South pack is in italics</i> - in largely chronological order	The site at Lots Road has a specific site allocation, Policy CA7, which

	<p>Firstly, the cover page shows the appropriate scale of the existing buildings, with their active street frontage, feeling of accessibility.. Note too the M shaped roof, so rare it is mentioned (see below) Imagine this streetscene if the council’s original vision had been shown on the cover, a CGI of blank monolithic structures, tall and overshadowing the area. The inclusion of an existing view almost implies the future vision will be similar, but those of us who attended ‘events’ know better. . Give your architects a better brief, ie no housing, or very little housing, and they will be able to come up with something as iconic, varied and attractive as the existing view shown, especially if this is free of housing. There is a history of building too much within a too small site, we live with the consequences.</p> <p>At the beginning of the document it <i>states 55 extra care units 4,000 sq m commercial</i> and no residential listed. Obviously this is primarily an employment/enterprise zone, not an opportunity to meet housing targets. It is important to note the statement: Power station (Chelsea Waterfront) says <i>420 new homes and 4900 sq m retail and business space</i>. So Lots Village will have 420 new homes, plus those just over the borough boundary who use the road and pavement networks and green spaces, so in a short space of time over 1,000 people will be new users of the area. Can we really sustain any more? It states <i>The London Plan March 2021 - delivering the homes Londoners need 4,480 homes</i>. But what about existing Londoners and their quality of life? Blighted by over zealous plans. <i>Site Allocation Policy CA7</i> has no mention of housing <i>Dementia friendly living</i> is highlighted and yet there was the plan to surround the extra care facility with an overdeveloped cacophony of buildings and activity, how is this dementia friendly?? See below It states the <i>Leadership team approved projects November 2021:</i></p>	<p>allocates the site for “a mixed use development to include residential and employment floorspace”. The quantum of different land uses (such as residential) is not specified in the draft design brief and is outside its scope. The resistance expressed by members of the local community with regard to a high quantum of residential compared to employment floorspace was noted in the workshop records. The proposed design principles apply to varying quantum of uses.</p>
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		<p><i>5,000 sq m of Class E employment/commercial - cafe - community space - auction house - design companies - medical/NHS - galleries - retail uses = 25% increase</i></p> <p>The use of medical/NHS implies a medical facility might not be NHS, yet the aim is for affordable housing, where will they go if not to the NHS. We are well served with private doctors in the area, private dentists, private hospitals. Increase the social housing and it is NHS that is needed, not private botox clinics or such ilk. Chelsea Waterfront was to have a “doctors’ surgery”, it was on the ground floor, opposite the pub, therefore accessible. But RBKC allowed it to be moved to an internal space, a space we know will be gated and patrolled so this is very unlikely to become an NHS unit. Such units are unlikely to be involved in future immunisation plans or other public health matters, ie they do not serve the community. For instance, Immunisation, booster roll out was initially offered in places far and wide because of the lack of NHS facilities in SW10. If we want to reduce pollution and travel we need local facilities, not ask people to travel out of borough. Why not have a replacement for the Violet Melchett centre, integrated with the care facility, where they can offer community services, or combine this with Cheyne Nursery rather than insisting on housing in such a sensitive area. If you insist on building more housing, especially more social and affordable housing they need the appropriate infrastructure and the extra care units will also need doctors and dentists</p> <p>Not mentioned in the documents, but is on the Forward Planning email alerts: What exactly is the ‘variation to existing land agreement in relation to Council owned land at Lots Road SW10’. Should this not form part of the Draft?</p>	<p>Noted the Council will need to work with the NHS to understand whether at application stage and later this is a site that would benefit their strategies and the local residents best. The design code does not preclude the NHS from using any such unit if appropriate.</p> <p>The draft design code focusses particularly on the site at Lots Road South and includes a summary of relocation and reprovision of on-site facilities on page 11.</p> <p>The draft design brief does not restrict any use to any levels but allows for the best design of the site for the specific uses as designed by a future architect.</p>
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		<p><i>Class E affordable workspace - communal managed garden (closed at night) - ground level garden for care facility - landscaping to Chelsea Creek frontage - class C3 Extra Care - social rent - key worker and open market homes.</i> Presumably part of the extra care facility will be ground floor if the garden is ground floor? It is imperative that residents can be wheeled outside or walk into a very secure space and that it is accessible, not restricted because staff don't have time to wheel them through corridors and down lifts. Still nothing is mentioned about fire and ambulance accessibility to the Extra Care units.</p> <p><i>“Having sought the views of Local residents, options have been developed that will increase employment space new homes (50% of which will be affordable) Not all the ‘local residents’ were in fact local or residents! Those who were local repeated time and time again that there was no desire to have more housing in the area. The consultations themselves were more of an exhibition of the councils’ wish list, if ‘options’ were shown they didn’t ever have a zero option. Outside organisations have their own agenda and this should not be imposed upon the residents who live here</i></p>	<p>Design Principle 14 includes a requirement for “easy access to attractive, safe outdoor amenity space”</p> <p>Any application will be required to include a fire statement and ensure emergency access.</p> <p>This section will be amended to reflect the Key Decision Report without implying there is overall support for new residential developments. Page 10 to be reworded as follows: Based on views of the local community and constraints set by the London Plan, options have been developed by the Council’s Social Investment and Property team. The development options seek to increase employment space and enhance the Employment Zone while delivering new homes, community facilities, landscaping and greenspace.</p> <p>Noted. The design brief deals specifically with the design</p>
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		<p><i>Operational uses - Highways depot and salt store - care pound moves to Park Royal - Temporary relocation of Street Sweepers to Old Ferry with permanent move at Cremorne Wharf</i> This is still very confusing, each time one or other of the areas are mentioned it varies, the two sites should be looked at together as each seems to be housing one facility or the other, its a very complicated game of chess at the moment. As it stands it appears (from the very sketchy plans) that Cremorne Wharf will not be another green open space, it will be overshadowed by a facilities building, ie a council depot with a bit of green. You are simply overcrowding and overshadowing any opportunity there is to IMPROVE the area. Instead your are dragging it into the mire. There should also be an assurance that the Gardeners' area and toilet block of Westfield Park will not be developed, and that Cheyne Nursery will just be a nursery, not housing.</p> <p><i>Placemaking - how to open up Old Ferry Site as a gateway to the wider Lots Village neighbourhood. Cremorne Wharf to be re-provisioned to include council facilities, green space, new park, 5 a side football</i> See above re council facilities. An actual gate is mentioned in the notes? Why do we need a 5 a side football area when the Worlds End has a massive football facility, can't the two be consolidated and a better management and booking system be put in place. There should be a two way street metaphorically speaking, and actually physically speaking as we know the one way system forms its own barrier to the wider world. There is actually a need for an informal ball games area, but not an organised bookable space as this would prevent a parent just rocking up and playing ball. A dog exercise area also where off lead activity can take place to protect the flower beds of the green spaces. The adult gym was refused until NCIL application, this should be considered, along with an elderly/dementia friendly area.</p>	<p>principles for the Lots Road South site.</p> <p>Noted and agreed re access to the waterfront for public access.</p>
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	<p>On the notes re key findings <i>public access to the river is top of the agenda</i>. Having failed in preventing Chelsea Waterfront welcoming locals, ie security and private land signs, it is imperative that access to both the Creek and Cremorne Wharf/Old Ferry ensures locals have a connection with the water, and increases their enjoyment of the wildlife water can attract, especially as the Thames Path is so fragmented.</p> <p><i>02 Spacial Analysis - Ground floor commercial with upper floor residential</i> are noted, the map is not accurate, nor are the building heights or the materiality</p> <p>Is this really the right way to go? Can there really be a harmonious mix of commercial and housing? If the units are purely offices then that can work, but if you put into the mix Auction deliveries (which at present has a cafe), cafes, storage, shops etc you then have to severely covenant the uses to restrict delivery noise, cooking smells, 24 hour working, rubbish collections. We know locally how severely business use can impact the quiet enjoyment of ones home. In Lots Road Westfield Close probably has the greatest example, strong garlic and peanut odours, weekend furniture deliveries and collections, night time economy noise, pavements blocked by bulky deliveries, furniture lorries waiting overnight for the premises to open with the drivers sleeping in the cab, chemicals and air conditioning impact from a hairdressers. Weekend and early morning window cleaning of offices. A unit serving drinks and cold food (ie without cooking odours) can easily convert to a full hot food takeaway given the relaxation in planning. Strict covenants need to be in place to prevent nuisance.</p> <p><i>03 Design Principles - vision improved and additional jobs - future cycleway/pedestrian route</i> This needs to be firmed up more, it is essential even if adjoining areas may not want to be a part in the string, there is no reason RBKC can't have their own route, level, wheelchair and pram friendly space, one often sees parents using the road to wheel the pram up and down for a walk as it is level and step free</p>	<p>Mixed use developments can work well together if planned effectively and managed well. Whilst an applicant will need to ensure this is evidenced the principles aim to guide this coming forward in a holistic way.</p> <p>Noted</p> <p>Noted. The design brief does not preclude a façade retention scheme if possible and of benefit. The Design Brief also recognises the</p>
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		<p><i>Lots Road Buildings</i> - elevations shown are very small (page 26) and it is noted “M” shaped roofs which have become very rare. Fig 3.15 If these are so rare, then why demolish them and replace them with something mundane? Surely this is missing a trick. The scale and form of the existing buildings is acceptable and works with the existing streetscape, so retain them, improve them, keep the facades.</p> <p><i>Overall Height Principles. Fig 3.21 page 28.</i> The Fulham Gasworks now dominates the streetscape, it is vital that the inner core of Lots Village remains low built, don't encroach more height into the area, we have enough</p> <p><i>Light to Heatherley sensitive to development.</i> Very happy to hear this, given that this was a fairly recent development, built to a specification as an art school, and with a high design value it must remain fit for purpose. Many funds went into the enforced move from the school site of facilities, how can you even consider overshadowing it?</p> <p><i>Public space - photo of pocket park page 32.</i> The more green, the more non concreted drained areas the better</p> <p><i>Chelsea Creek - make a feature</i> Existing ecology should be preserved, too much wildlife has been disturbed of late.</p> <p><i>Allowance for green route - safeguard a buffer zone</i> see above. It is however vital that safe pedestrian passage is maximised, without fear of cycles and scooters, electric or otherwise.</p> <p><i>Servicing.</i> This is vital, Lots Road presently becomes very congested with Auction house traffic and parking. Could an underground service and parking area be considered for the auction house, in order to make use of the massive basement dig required to rid the soil of contamination, thus preserving the ground levels for more green, more pedestrian space.</p> <p><i>Community space - natural light</i></p>	<p>character that the 'M' shaped roofs bring to the area.</p> <p>Noted. An approach to height is dealt with by the design brief.</p> <p>Noted, this is reflected in Design Principle 8 of the draft design brief.</p> <p>Noted.</p> <p>Noted. Ecology and biodiversity will be dealt with in any application. Noted</p> <p>The design code does not preclude options of underground servicing in any future application.</p> <p>The Design brief principle 13 deals with community space making it clear that it needs to be fit for purpose, meeting the needs of the</p>
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	<p>Please don't make Community space inaccessible - level entry to round floor is essential - please don't even consider putting it on higher levels and saying there is a lift - the recent pandemic has shown that lifts severely restrict access - large hospital lifts were restricted to four people - a lift is an enclosed space with no ventilation. The space itself must have some natural ventilation, facing a quiet space, ie not facing a busy road where a meeting cannot be conducted because of traffic noise or noise from the school if a window is open. In the notes you mention birthday parties etc, there are a multitude of cafes etc who can facilitate these, if you have too many functions then proper community use will be lost or restricted so much they have to revert to a noisy pub (as happens now) <i>Extra Care</i> - the definition is listed as <i>very sheltered - assisted living - staff 24 hours</i> etc. Yet still this extra care facility is for a very limited selection of residents, ie only those in existing social housing or on existing benefits? Nothing for existing homeowners, nothing to buy, only for social rent. There is nothing to replace the Convalescent facilities lost of late in the area, there is no like for like replacement of closed units. There's no respite facility for short term stays. Home owners will still be exiled out of borough to find sheltered housing or a care home, and be forced to lose their base in the borough. Why not also facilitate private sheltered type housing on this site also, if there has to be housing. The vast majority of housing stock in the area is unsuited to elderly or disabled living, even level living flats are mostly accessed via steep stairs, thus marooning the resident in the property. If you provide the right type of housing for locals, then you will surely free up family homes, both private and social. Many inhabitants don't move because they know this means moving away from their friends and network, so they battle on, they won't go into care because it is too far for friends or relatives to visit. Provide single units so you can free up a three bed property occupied by a single resident on social rent, tighten up on multiple social housing occupiers (ie those</p>	<p>community and not located at basement level. The exact location of community space will be determined by the needs of the final proposed end use at application stage.</p> <p>The extra care facility allocated to be sited here meets one specific need in the borough. There are as you state a multitude of needs in the borough and the design brief does not prohibit other uses that meet those needs from coming forward.</p> <p>The London Plan sets the requirements for disabled accessibility for all new homes in London. The design brief does not prohibit the size of units coming forward not where or how each unit is designed.</p>
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		having property in RBKC and elsewhere) sub rented out for profit or as holiday lets. The more you build, the more this will happen and there will still be waiting lists.											
14	Mark Furnish (Sport England)	<p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport. Sport England aims to ensure positive planning for sport and physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for participation and physical activity now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport</p> <p>Sport England has reviewed design brief and would encourage that the Council include Active Design principles within the document to assist creating an active environment within the area. Sport England, in conjunction with Public Health England, produced 'Active Design' (October 2015) which is a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for</p>	<p>Noted. Active design principles are generally more suitable for larger development. However, the principles of active design are broadly incorporated into the design brief for this site. The table below shows how the principles are already linked.</p> <table border="1"> <thead> <tr> <th>Active design principles</th> <th>Design brief principles and notes</th> </tr> </thead> <tbody> <tr> <td>1. Activity for all neighbourhoods</td> <td>6. Lots Road commercial activity 7. Courtyards 9. Public space 14. Extra care</td> </tr> <tr> <td>2. Walkable communities</td> <td>6. Lots Road commercial activity 7. Courtyards</td> </tr> <tr> <td>3. Connected walking and cycling routes</td> <td>11. Allowance for green route</td> </tr> <tr> <td>4. Co-location of community facilities</td> <td>9. Public space 13. Community space 15. Shared facilities</td> </tr> </tbody> </table>	Active design principles	Design brief principles and notes	1. Activity for all neighbourhoods	6. Lots Road commercial activity 7. Courtyards 9. Public space 14. Extra care	2. Walkable communities	6. Lots Road commercial activity 7. Courtyards	3. Connected walking and cycling routes	11. Allowance for green route	4. Co-location of community facilities	9. Public space 13. Community space 15. Shared facilities
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		<p>the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for development area. The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-costguidance/active-design</p>	<p>5. Network of multifunctional open space</p>	<p>7. Courtyards 9. Public space</p>
			<p>6. High quality streets and spaces</p>	<p>6. Lots Road commercial activity 7. Courtyards 9. Public space</p>
			<p>7. Appropriate infrastructure</p>	<p>9. Public space 11. Allowance for green route 13. Community space</p>
			<p>8. Active buildings</p>	<p>6. Lots Road commercial activity 7. Courtyards 9. Public space 14. Extra care</p>
			<p>9. Management, maintenance, monitoring & evaluation</p>	<p>Dealt with via site management plan with planning application.</p>
			<p>10. Activity promotion & local champions</p>	<p>It is expected that the extra care facility would include a programme of events including those that encourage</p>

				physical activity.
15	Martyn Baker	<p>O I. INTRODUCTION --- As a consultation document this is fundamentally flawed because it avoids providing anything more than minimal figures to reveal the parameters of this proposed development, focusing instead on form/appearance rather than function/scale/substance.</p> <p>Page 4 PURPOSE: The numbers given are minimum space allocations, and the reference to a mixed-use development is decidedly misleading because the Council wants a predominately residential development to be superimposed on Chelsea’s only Employment Zone (see below)</p> <p>THIS IS DESPITE THE LOCAL PLAN APPROVED BY HMG IN SEPTEMBER 2019 seeking to protect Employment Zones from such inroads by adherence to POLICY CF5, with 31.3.543 laying down that “In order to ensure that business uses are maximised residential uses will only be permitted when they can be shown to be necessary to enable a significant uplift in business floorspace. As well as being a significant uplift, this floorspace must be of at least equal quality to that being re-provided WITH NO MORE RESIDENTIAL FLOORSPACE BEING PROVIDED THAN THAT NECESSARY TO ENABLE THE UPLIFTTHIS WILL NORMALLY BE ENSURED THROUGH ENSURING THAT ONLY A SMALL PROPORTION OF THE FLOORSPACE OF A GIVEN SITE IS RESIDENTIAL.”</p> <p>Your minimum proposal put forward at a recent Consultation meeting was for a huge 25,800 sqm of development for this small site in Lots Road South, with 18,000 sqm for residential and only 5,000 sqm for an undefined mix of other uses including community, medical and NHS uses as well as some commercial uses which could well mean an insignificant uplift in the existing business workspace.</p> <p>Page 6 AREA CONTEXT :This text appears designed to imply that with other huge residential developments going on round Lots Road South this site is also worthy of massive over development. Yet the Council and then</p>		<p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>It is the site allocation, rather than the design brief, which allocates a quantum of development for the site.</p> <p>Policy CF5 is a borough-wide policy that relates to business uses including Employment Zones. The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for “a mixed use development to include residential</p>

	<p>the Inspector opposed the excessive height/density of the proposed Power Station site. With an agreed 420 residential units being packed onto this 1.77 hectare site it will shortly make Riverside Ward by far the most densely populated ward in Chelsea. Yet what this Design Brief is now suggesting should be built on the site of the commercial buildings so recently purchased by the Council (at 65-69 and 71-73 Lots Road South) is another 200 residential units. In view of its much smaller size this site's population density would exceed that of the Power Station!</p> <p>Page 8 PLANNING POLICY CONTEXT: The defining characteristic of the Lots Village Conservation Area and Employment Zone is the exceptional intermingling of small homes, much sought after employment space, creative design studios, a famous Fine Art School, Garden School and Jazz. Your list of key Policies should therefore have included CF6 Creative and Cultural Businesses</p> <p>The Local Plan 2010 sought to generate a dynamic approach to furthering the wellbeing and productivity of all those living and/or working in the Borough, with essential job generation and the protection of all forms of productive work space especially in Employment Zones being well articulated under the heading of FOSTERING VITALITY. In this decade more jobs for key workers and school leavers from the Chelsea Academy and other local schools need even greater attention in planning terms. So to encourage the building instead of yet more high-end OPEN Market UNITS not affordable by local people so attracting still more absentee owners would be retrograde.</p> <p>Page 10 SITE OWNERSHIP AND POSITION: The first bullet point perfectly illustrates that what is on offer is NOT A 25% INCREASE IN EXISTING EMPLOYMENT SPACE on the site. High Street type shops and cafes are not job-generating design studios nor managed office workspaces. The "views of local residents" cannot be prayed in aid of the 50% of new unaffordable homes you have not so far explained or justified. By contrast</p>	<p>and employment floorspace", establishing the principle of residential uses on the site. The emphasis on employment is reflected in Design Principle 1 of the draft design code.</p> <p>CF6 shall be included in the summary of key policies.</p> <p>Noted. This is beyond the scope of the design brief and the design brief applies to varying amounts of floor space of different land uses.</p> <p>This section will be amended to reflect the Key Decision Report without implying there is overall support for new residential developments. Page 10 to be reworded as follows:</p>
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	<p>the provision of 55 affordable extra care homes for the elderly on the Pound site itself was welcomed at least five years ago by the Residents Association as urgently needed once the Council had closed down Thamesbrook and sold the site for over £70m. This sum we earlier understood from the then Leader of the Council at a public meeting should go towards funding a replacement care home on the Pound site.</p> <p>Page 23 DESIGN PRINCIPLES : You stop short of asserting that your 15 design principles actually emanated from those who attended your workshops without their first being briefed on the marching orders you must have already been given to overdevelop the site. This had clearly only recently been purchased (on behalf of ratepayers) not to belatedly enhance the Employment Zone's jobs and economic performance but surely to create many more homes.</p> <p>It is difficult to see how the "Employment Zone identity" can be "led by the employment use" when employment space could be overwhelmed by 200 housing units towering above employment space.</p> <p>Nor is it apparent how new buildings in Lots Road South can "respect the scale of existing buildings on Lots Road" particularly those opposite in the Conservation Area which you do not even mention.</p> <p>There should surely be no need for "taller buildings" provided high end housing is excluded from the site, and extra care space for the elderly is funded on a quid pro quo Thamesbrook replacement basis.</p> <p>Heatherley School should certainly be protected from loss of essential light for its key role.</p>	<p>Based on views of the local community and constraints set by the London Plan, options have been developed by the Council's Social Investment and Property team. The development options seek to increase employment space and enhance the Employment Zone while delivering new homes, community facilities, landscaping and greenspace.</p> <p>The design principles did indeed emerge from the workshops, and the strong objections to what may be proposed as part of the development were also recorded, including objections to large numbers of residential homes.</p> <p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London.</p>
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		<p>Chelsea Creek from the road bridge between RBKC and LBHF and the Thames itself is already due to be restored and enhanced by Circadian as part of the Section 106 Agreement covering the development of the Power Station site. A Chelsea Creek Management Plan aims to reverse adverse trends by removing accumulated silt so that this tidal habitat can be improved ecologically. As a River Thames Tributary Site of Metropolitan Importance and a protected Green Corridor it needs to be safeguarded. The concept of a Green Way was first proposed in the 2010 Local Plan but (like the extension of the Thames Path from Cremorne Gardens through to Chelsea Creek) no progress has yet been made. To now provide a protected quiet way alongside the railway line and away from the often very busy Lots Road South would be very welcome.</p>	<p>Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses. As noted above, the design principles are a series of challenges to the designer/architect of a scheme.</p> <p>Noted.</p>
16	Michael Spencer-Smith	<p>I hope that you will keep Lots Road Auctions as they provide a very useful service.</p>	<p>Noted. The retention of the auction house is included within the site allocation.</p>
17	Natalie Burrows	<p>I'm a resident of Tetcott rd This is a conservation area A small village called the Lots rd With only one small park for local residents to relax and take a breath The area is over populated with the opening of the school and additional pupils attending this year ... and endless high story buildings with no garden no parking no peace ... We can't see the sky or the horizon anymore which has an effect on locals residence mental health it feels like our beautiful small terrace houses are being dwarfed by greedy property developers Canary Wharf style which doesn't belong to this historic part of Chelsea Please save our village our parks and our mental health</p>	<p>Noted. Open space and height on the site is being dealt with within the principles.</p>
18	Natural England (Sharon Jenkins)	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and</p>	<p>Noted</p>

		<p>managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	
19	Peter Barrett (Lots Road Partnership)	<p>RESPONSE TO THE LOTS ROAD SOUTH DESIGN BRIEF DRAFT FOR CONSULTATION January 2022</p> <p>(Note: all elements below in 'bold' are direct quotations from the current adopted Local Plan (2019)):</p> <p>1 BACKGROUND TO CONSULTATION</p> <p>1.1 The Design Guide states 'The principles in this document were established with the local community at a variety of in person workshops close to the site'. The experience of those attending the 'consultation workshops' was that the feedback from those organising the workshops did not accurately or truly reflect the opinions of those attending. Instead the summary of the feedback on the 'design' recorded only what was desirable to be reflect favourably on the designated brief for the site.</p> <p>1.2 Thus the workshops recorded 'feedback' on the 'design principles'. However the 'design principles' are in fact the 'developer's brief' for the site where the Council, as the freehold purchaser takes the role of developer, not the role of planning authority. As such the Council abrogate their duty to the community to be independent as the planning authority. There is a clear conflict of interest in the dual role.</p> <p>1.3 Those elements of feedback which are not considered as suitable to affect the principles of the design were relegated to 'non-design themes'. Therefore key questions such as amount (quantum) of development, density and height, location of development and environmental impact, are not considered to be relevant to the design, when in fact they are key fundamental elements of the brief and therefore the design.</p>	<p>Noted. We will amend the design brief to include more information about the multistage early engagement process. On page 7 we will add the text in blue:</p> <p>"The principles in this document were established with the local community through a multistage early engagement process in line with the Council's Planning Statement of Community Involvement and the Charter for Public Participation. The process spanned March to November 2021 and involved over 20 local organisations and businesses. Initially, local residents' organisations, community groups and businesses were invited to discuss a vision for the whole neighbourhood, as set out in the</p>

		<p>1.4 In addition the list of attendees is strange and hardly representative of the local area. These are stated to be 11 local organisations ‘invited by the Council or appointed by local stakeholders’ that fit into two or more of the following categories:</p> <ul style="list-style-type: none"> • Based very close to Lots Rd South • With the right set of skills to support residents through the planning process • Representative of the local economy • Took part in mapping workshops in March 2021. <p>1.5 The invitees noted as attending were: the Architects of Invention, Chelsea Society, Chelsea Theatre, Cheyne Walk Trust, Heatherley’s School of Fine Art, Lots Road Auction House, Lots Village Association of Residents and Businesses, Nicholas Zervoglas Architects, Pooles Lane Association, Studio Rinaldi, and World’s End Studios.</p> <p>1.6 Thus there were only 11 invitees. Of these 4 are not based in the area, 2, although very local were not invited by the Council and so did not attend all the sessions, and two further attendees only attended one of the sessions. The workshops were therefore very strangely attended, not representative, and there is no evidence to support the statement that the attendees were charged in anyway to ‘support the residents through the planning process’.</p>	<p>“Lots Road Mapping Workshops: Summary of Feedback” document. Some stakeholders chose to carry on participating by taking part in a working group focused on the Lots Road South site, as explained in the “Lots Road South Design Workshops: Summary of Feedback”. The two separate engagement reports covering all phases of early engagement are published alongside this design brief.</p> <p>The business of the design working group was to review emerging development scenarios...”</p> <p>“Key points design concerns were raised by the design working group regarding the following design principles:</p> <ul style="list-style-type: none"> • Character • Massing and layout • Uses • Workspaces • Servicing and movement • Open spaces and Chelsea Creek • Greening and sustainability <p>Other non-design themes concerns raised at the workshops by the</p>
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		<p>1.7 Of those attending we are not aware of any who support the developer's/council's design principles or brief for the site.</p>	<p>design working group and at mapping workshops included:</p> <ul style="list-style-type: none"> • The importance of the Employment Zone the site sits within • Community infrastructure • Density and height • Environmental impact • Local opposition to additional housing apart from the extra care accommodation • Remedy loss of community space • New pedestrian connection across the railway is controversial <p>The design principles did indeed emerge from the workshops, and the strong objections to what may be proposed as part of the development were also recorded, including objections to large numbers of residential homes.</p> <p>Issues and concerns about the quantum of development, residential use in an Employment zone, density and others were</p>
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		<p>1.8 It is therefore questionable as to whether the small number of consultees were representative or that the feedback which claimed to represent the views of those attending was accurate.</p> <p>2 EXISTING USE AND SITE ALLOCATION PLANNING POLICY 2.1 The existing Planning Policy for the site stated in the adopted Local Plan (2019) allocates the delivery of a mixed-use development to include residential and commercial development of: ‘a minimum of 55 affordable care units’ – residential and ‘a minimum of 4,000 square metres of commercial space’ - commercial. (It is noteworthy that this initial envisaged Planning Policy brief has now been massively stretched – see below).</p> <p>2.2 Currently the site has 4000 square metres of commercial space, the rest being open air storage and the car pound.</p> <p>3 BACKGROUND TO PLANNING POLICY 3.1 The Adopted Local Plan (2019) has very clear guidelines for the site: ‘The employment zones will have been enhanced with new and improved employment floorspace and some supporting residential development providing a mix of uses and thriving centres for small businesses and the cultural and creative industries sector’.</p>	<p>discussed with the local community. It was explained that they were outside the scope of the design brief and that the borough must meet housing delivery targets set by the Mayor of London. Nevertheless, such concerns were included in the record of the workshops and the proposed design principles apply to varying quantum of these uses.</p> <p>The planning department has developed the design brief in consultation with the community to be attached as necessary to any future development brief that the property team at the Council propose. The planning brief has been developed in line with the statutory requirements for local planning authorities when developing supplementary planning documents.</p> <p>It was stated at workshops that those elements such as quantum, density etc are not able to be amended within the design brief.</p>
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		<p>3.2 Indeed the Council's (as planning authority) vision for the development states that the provision of business class floorspace is likely 'to come forward through the intensification of business uses on existing sites. The borough's Employment Zones are likely to have an important role in this regard'.</p> <p>(Note: there are only 3 in the Borough, with the Lots Road Employment Zone being the only one in Chelsea).</p> <p>3.3 The Council (as planning authority) state that they (the Council) will ensure that new development contributes to the visions, principles and priorities identified within the place chapters of the Local Plan. This vision for the site within the context of the area, site and place notes 'the area includes both a conservation area and employment zone designation, reflecting what remains of Chelsea's working riverside heritage alongside low-rise Victorian terraced houses'.</p> <p>It goes on to emphasise 'the Lots Road Employment Zone contains a cluster of antiques and art-related firms focused on the Bonhams and Lots Road auction houses, as well as designers and business services typically associated with the creative industries. There has been a recent emergence of interior design and business services in the area reinforced by the Design Centre nearby in the London Borough of Hammersmith and Fulham'.</p> <p>3.4 The 'overarching aims' the Council stipulates for this site are to: 'Maximise the benefits of the area's riverside location and ensure that new development in close proximity to the River Thames makes the most of the amenity value it provides'.</p> <p>'Protect and improve existing green open space and create new open space where possible'.</p> <p>'Enhance and increase small business and light industrial uses within Lots Road Employment Zone'.</p>	<p>However, they are able to be amended through the draft Local Plan review which was published for consultation at the same time.</p> <p>The number of organisations in attendance shall not be confused with the number of individuals. 30 individuals from 11 organisations took part in the design working group.</p> <p>Local residents' organisations, community groups and businesses were invited to get involved at the start of the planning process to discuss a vision for the whole neighbourhood, as set out in the document Lots Road Mapping Workshops: Summary of Feedback. Some stakeholders chose to carry on participating by taking part in a working group focused on the Lots Rd South site, as explained in the Lots Road South Design Workshops: Summary of Feedback. The two separate engagement reports covering all phases of early engagement are published alongside this design brief.</p>
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	<p>‘Support the biodiversity potential of Chelsea Creek. · Improve local air quality’.</p> <p>‘Support the antiques, furniture and design cluster in Lots Road’.</p> <p>‘Extend and improve the Thames Path’.</p> <p>3.5 Indeed in order to ensure these policies are maintained and their aims delivered, particularly in the Employment Zones, the Council (which with a Borough wide Article 4 Directive prevents the change of use by Permitted Development from commercial use to residential) notes: ‘As a borough with some of the highest land values in the country, there is a danger that lower value land uses, such as light industrial or offices, will be replaced by higher value uses such as housing (including student accommodation). It is therefore essential that the function of the Employment Zones is clear – <u>that these are commercial areas, areas whose function is to accommodate a range of B class business types which support the local and the wider economy’.</u></p> <p>3.6 The Council does, however, recognise that the introduction of some residential floorspace within an Employment Zone can help bring forward new business development and deliver housing supply: ‘In order to ensure that business uses are maximised, residential uses will only be permitted when they can be shown to be necessary to enable a significant uplift in business floorspace. As well as being a significant uplift, this floorspace must be of at least equal quality to that being re-provided with no more residential floorspace being provided that that necessary to enable the uplift’. The Adopted Policy goes on to note: ‘It is also essential that the commercial character and function of an Employment Zone is not jeopardised by the introduction / expansion of residential uses. This will normally be ensured through appropriate design, through the retention of the business function of ground floor frontages and through ensuring that any mixed use development within an Employment Zone is business led’.</p>	<p>The feedback summary aimed at capturing all topics discussed at design workshops. There are clear references to the community’s perceived clash between employment and residential uses, that the latter should be minimum only to enhance the employment use, and that other areas may be more suited for social housing considering the existing proportion of such accommodation in Chelsea Riverside ward. The mapping workshops report also clearly states the Lots Village Association’s rejection of “any additional residential buildings”. Therefore, the feedback reports do capture that members of the community oppose housing developments.</p> <p>Comments on the design brief in this document show there is agreement around many design principles albeit the contentious quantum of development fixed by housing delivery targets. Nevertheless, such concerns were included in the record of the</p>
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	<p>4 THE SITE AND LOCAL PLAN</p> <p>4.1 Despite the current site allocation (see para 2.1 above) the development brief report entitled 'APPROVAL TO PROGRESS PROPOSALS FOR COUNCIL OWNED LAND IN THE LOTS ROAD AREA' dated 1st November 2021 and presented to and approved by the RBKC Leadership Team on 10th November 2021 proposes uses and quantum of development for the site wildly different to that stated in the council's own approved and adopted Local Plan. The report suggested an allocation of '202 homes including 65 Extra Care homes'. This was approved at that meeting.</p> <p>4.2 Little to no mention is made of commercial space or any of the other 'overarching' aims of the Council. It is notable that this presentation did not 'lead' on employment policy requirements. It is self-evident that the scheme is envisaged to be a housing scheme and not an employment led scheme.</p> <p>4.3 Extraordinarily, whilst the Design Brief notes the current proposed use as 'a minimum of 55 affordable extra care units and a minimum of 4000 square metres of commercial floor space', and 'in November 2021 approval to progress...development proposals...was agreed by the Leadership Team', nowhere in the Design Guide is it stated that this approval requires the provision of '202 homes including 65 Extra Care homes'. This is very strange bearing in mind the document entitles itself to be a 'brief'. No additional commercial space is provided and but the proposal includes a massive 147 additional residential units.</p> <p>4.4 It is also notable that the massing development modelling plans presented to the Leadership Team as part of the Report showed the whole of the Council owned site being developed, whereas the massing and modelling diagrams developed by the Council (as developer) during the design code workshops showed the large proportion of the building mass</p>	<p>workshops and the proposed design principles apply to varying quantum of uses.</p> <p>Noted. the allocation is set as a minimum requirement for the site.</p>
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	<p>being developed within that portion of the site lying within the RBKC boundary.</p> <p>The density and visual impact of the scheme was presented and considered for approval was therefore artificially diminished.</p> <p>4.5 The reasons given at the design code workshops for this anomaly were that the extra care units and the affordable housing needed to be sited within the RBKC boundary for the borough to retain nomination rights, and that if any market (private) housing was located within the part of the site within LBHF, they would require a significant affordable home provision.</p> <p>4.6 It has also been suggested that the large amount of private housing being proposed is required to make the site 'viable'. The viability of the site will depend on a number of factors, but most notable are:</p> <p>A. The purchase price: (which itself is a reflection of the developer's assessment of what he can 'get on the site' (private housing being the most valuable in the current market). A developer suggesting a large amount of private housing in an Employment Zone might be considered to be taking a significant planning risk.</p> <p>and</p> <p>B. The build cost of the development: At the design code meetings it was stated on a number of occasions that the construction cost of the proposed development was greater than expected as the land is contaminated and has to be dug out to a significant depth at great cost. Bearing in mind that the site was in industrial use for over a century, and that most recently, as is well known, the land was used as a scrap metal merchants where batteries and tyres were dumped for many years, it is hardly surprising the land is contaminated. (The underground waste spontaneously ignited in the 1980s releasing toxic gases. The fire took nearly a week to extinguish. The local area had to be evacuated).</p> <p>No viability study is included to illuminate matters.</p>	<p>The question of the site viability will be examined, if necessary, as part of the planning application process. The quantum of development is not specified in the draft design brief and viability is outside the scope of the design brief.</p>
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		<p>4.7 It should be borne in mind that (as stated, for instance in the London Plan 2021): ‘Developers should have regard to designated development capacities in allocated sites and ensure that the design-led approach to optimising capacity on unallocated sites is carefully applied when formulating bids for development sites. The sum paid for a development site is not a relevant consideration in determining acceptable densities and any overpayments cannot be recouped through compromised design or reduced planning obligations’.</p> <p>5 DESIGN BRIEF</p> <p>5.1 The Design Brief issued for consultation must be considered within the context of the above.</p> <p>5.2 As such there is little within the Design Brief to disagree with and much to commend it. Overall, and taken without the constraints detailed above, the local community would likely support and endorse it. But its aspirations, and the visions, requirements and policies laid out in adopted Local Plan (2019) cannot be achieved if the amount and location of development and excessive residential provision approved by the Leadership Team and repeated in the draft Local Plan is not reduced and altered.</p> <p>5.3 Commenting briefly on these in the order they are presented: Vision No comment</p>	<p>Whilst the Council have been developing options to bring the site forward the design brief and its vision and principles will be applied through the planning process as a supplementary planning document if adopted.</p> <p>The design brief works on the basis of the Local Plan as a starting point, of which the site allocation is a minimum.</p> <p>Various design options were reviewed through the workshops to understand the communities concerns with regards to scale and massing. This was done as part of</p>
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		<p>Employment Zone identity: No comment. The relocation of the 606 Jazz Club which has operated continuously for over 30 years in cramped basement premises in Lots Road might be considered as a suitable 'creative and artistic' user of basement space.</p> <p>Sustainability No comment</p> <p>Lots Road buildings It should be noted that the aim to respect the scale of the existing buildings on Lots Road and respect the adjacent Conservation Area will not be possible unless the quantum and location of the development put forward during the design workshops is radically changed and reduced.</p> <p>Character of architecture No comment</p> <p>Overall height principles No comment except to reiterate that the proposed large amount of inappropriate development of housing currently proposed on the site will adversely affect the amount and character of the commercial development possible on the site and result in an undue and inappropriate</p>	<p>8. Light to Heatherley School of Fine Art Ensure the development does not compromise the quality of the light to Heatherley School of Fine Art north-east facing windows nor result in overlooking or a loss of privacy for rooms served by the windows.</p> <p>Noted. The design brief cannot stipulate particular end users at this stage. However supporting existing local uses is encouraged where appropriate.</p> <p>Noted. The design brief does not put a limit on development for the site. The site allocation in the Local Plan allocates the minimum development for the site.</p> <p>Noted</p>
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		<p>pressure to develop the site with tall building development, particularly on the eastern (Lots Road) side of the site, in close proximity to the Lots Road Conservation Area.</p> <p>Lots Road commercial activity As above</p> <p>Courtyards No comment</p> <p>Light to Heatherley School of Fine Art As above</p> <p>Public space There is comment elsewhere that the public space should be closed at night. This tends to make and mean it is not a public space, but a private space. Indeed such spaces and public uses are often promised in planning applications and conditions, and then found to be awkward to deliver in reality (for instance the public use of the playgrounds for community use in the Chelsea Academy which was found to be too expensive to operate without compromising the security and use of the building).</p> <p>Chelsea Creek No comment</p> <p>Allowance for green route No comment</p> <p>Servicing No comment</p>	<p>See above</p> <p>Noted. The management of the public space would need to be determined at planning application stage.</p>
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		<p>Community space No comment</p> <p>Extra care No comment</p> <p>Shared facilities The development should be employment led, and any residential development kept to the minimum necessary, and taking on board the comments noted elsewhere in this response.</p> <p>6 CONCLUSION 6.1 The aspirations of the design guide are, overall, to be commended. 6.2 However bearing in mind the character of the area, and the stated 'overarching' aims to foster, enhance and increase the creative and commercial uses of the site, the local architecture and the Conservation Area, there is no way these aspirations can be achieved without changing the design brief to reduce the amount of development, reduce the amount of housing, and locate a large proportion of the new building to the western boundary of the site.</p>	<p>Noted. It will need to be examined at application stage against the statutory requirements, local plan policies and the design principles of any adopted design brief. Noted.</p> <p>Noted. Noted.</p>
20	Raja Al-Khatib	<p>All these developments in the area are increasing vehicular traffic resulting in pollution and noise. The brief should include a high limit on parking spaces for the residential housing and specific hours where deliveries can be made so they don't disrupt public transport, or an increase in the pedestrianised zones. Also, there is a great lack of green spaces and trees in the area not just generally but to offset all the vehicular traffic due to the increased development.</p>	<p>Noted. Parking standards are dealt with in the London Plan policies which encourages car free development. Any forthcoming application would be required to submit a servicing plan.</p>

			Noted re open green space and trees; this falls under Design Principle 2 in relation to Greening.
21	Richard Jacques	<p>I am writing formally to respond to your consultation on the Lots Road South draft design brief, published on 24th January 2022. I write in my capacity as a local resident, having lived in the area for over 14 years. Firstly, I wish to make clear that I desire, along with many other local residents, to see the regeneration of the Lots Road South site, furthering the social and economic development of our area. As the only dedicated Employment Zone in Chelsea it has the potential to play an important role in the economy of our part of the borough and more widely in London, bringing new jobs and skills for those living and studying in the area. I hope my comments and objections to the draft brief will therefore be seen not as an opposition to development, but as a call for the brief to reflect the nature of the Employment Zone and the Policy Planning Context as set out on page 8 of the draft design brief.</p> <p>Turning to my objections in detail:</p> <p>1. The Lots Road Employment Zone</p> <p>On Page 4 you suggest the brief should deliver a minimum of 4000 square metres of commercial floor space. I do not accept that this is consistent with the plot's designation as an Employment Zone.</p> <p>As you set out on Page 8 of the draft design brief, Policy CV1 sets out a vision for the borough, which includes allowing each community to fully realise its potential, stimulating improvements across the borough, ensuring development will be of a high-quality design, well integrated into its context and enhancing Employment Zones with new and improved employment floorspace and some supporting residential development providing a mix of uses and thriving centres for small businesses. Designating only 4000 square metres of commercial floor space is</p>	<p>The reference to 4,000 sqm of commercial floor space is taken from adopted Local Plan Policy CA7 and is not part of the design brief itself. The site is allocated via this policy for "a mixed use development to include residential and employment floorspace" and therefore the principle of residential uses on the site is established. The design brief reflects, in principle 1, the</p>

	<p>insufficient to allow the potential of Employment Zone and our community to realise its full potential. This amount of space will not create a sufficient draw for new businesses or allow us the possibility of attracting the high value design businesses that Policy CV1 envisages. In addition, Policy CV1 only foresees the possibility of ‘supporting residential development’. As I am sure you are aware this only allows for residential accommodation for a workforce to enable the development of the Employment Zone. In your plans as currently drafted it would appear that this policy has been subverted and only a small amount of commercial space is being allowed to support your rationale for a significant housing development.</p> <p>As you set out on Page 8 of the draft design brief, Policy CV9 sets out a vision for the Lots Road/Worlds End area, which includes an aspiration for the Employment Zone to function as a centre for innovation focusing particularly on art, architecture, antiques and interior design. This aspiration cannot be met by a development that only requires 4000 square metres of commercial floorspace and of which only 2000 square metres must be provided for business use. To meet the aspiration of CV9 would require a substantially larger commercial development, dedicated to attracting innovative, high value businesses, which may might even have the potential for some creation/manufacturing on site.</p> <p>As you set out on Page 8 pf the draft design brief, Policy CF5 sets out Borough-wide policy for development in Employment Zones. In addition, the Local Plan only allows new homes to be built within the Employment Zone when these are shown to, “support a significant uplift in both the quantity and quality of business uses on the site”. As I have said in relation to Policy CV1 the new homes planned are entirely unrelated to the uplift in the quantity and quality of business uses on the site. Firstly, the provision of a large quantity of new homes will directly impact the amount of space given over to attracting new businesses to the site, a critical</p>	<p>importance of the Employment Zone in leading the character of the site development. As the design code does not specify a quantum of commercial or residential (be that market, affordable or affordable extra care) floorspace, the principles apply to varying quantum of these uses.</p>
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		<p>factor in making the area a hub for high value innovative businesses. They will also detract from the type of business that we can attract, given that most of the floor space will be underneath large residential developments, spaces that are usually only suitable for retail tenants and even then not the high quality, high impact businesses that would make a qualitative difference to our area.</p> <p>In short, although you have set out in the design brief a number of important Planning Policies, you have chosen to ignore your own guidance both in setting an unacceptably low amount of commercial space within the development and in suggesting a large residential development that would contravene the policies concerning the Employment Zone and severely constrict the quantity and quality of new businesses coming to the area.</p> <p>2. Volumes and Massing</p> <p>Your draft design brief is largely silent on the subject of volumes and massing, despite this having been a critical issue for respondents to your earlier (insufficient) public consultations.</p> <p>As you set out on Page 8 of your draft design brief, Policy CL5 requires development to ensure good living conditions for occupants of new, existing and neighbouring buildings. You go on to claim that, during the preparation of this document, care has been taken to ensure that the suggested height and massing of development take particular care of the Arts school. Judging from the limited information that you have provided on the issue of volumes and massing, the scale of residential housing suggested on a naturally constrained site and the diagrams that were used in your earlier consultation meeting, it is clear that the developments being proposed would be highly detrimental to the world class Arts school in Lots Road. Buildings of the scale and volume they you have indicated would not only block our light from the Art School but would also lead to</p>	<p>It is the site allocation, rather than the design brief, which allocates a quantum of development for the site.</p> <p>It is worth noting that members of the community are expected to have future opportunities to influence any potential new development if and when a planning application is submitted to the Council.</p> <p>Principle 8 has been included in the draft design brief (Light to</p>
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		<p>the Art school being significantly over-looked, an unacceptable situation for an establishment that teaches life drawing.</p> <p>You claim on Page 8 of your draft design brief that the Lots Road area 'historically had important and large scale industrial and commercial activities'. Please could you provide the evidence that you are referring to? As you are no doubt aware, the only large scale activities of which physical evidence remains are the Power Station and Wharfs of Chelsea Reach. The vast majority of the area impacted by the Lots Road South development are two and three storey late Victorian residential dwellings. Your description of the Lots Village Conservation Area is therefore highly</p>	<p>Heatherley School of Fine Art) to deal with this concern. It will be a matter for the designers/architects of a scheme to find a solution. It is noted that the question of overlooking has been raised which is also pertinent to ensuring the School's activities, i.e. life drawing classes, are not compromised The following change will therefore be made to draft Principle 8 (new text in blue):</p> <p>8. Light to Heatherley School of Fine Art Ensure the development does not compromise the quality of the light to Heatherley School of Fine Art north-east facing windows nor result in overlooking or a loss of privacy for rooms served by the windows.</p> <p>This extract is from page 10 of the Lots Village Conservation Area Appraisal. The document goes on to state, "In addition to Lots Road Power Station there was a large flour mill and saw mill on the southern boundary of the site and a</p>
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	<p>misleading, and the design brief should therefore be rewritten to give a true account of the area. A high priority should be given to any development adhering to the volumes and heights of the existing buildings on the West side of Lots Road and the wider residential nature of the Lots Village Conservation Area.</p> <p>3. Detailed comments:</p> <p>Page 10 – This page suggests that a Leadership Paper setting out expected elements for the development of Lots Road can override the serious issues with the brief set out above. In particular the Leadership Paper appears to have adopted positions in relation to the nature of Employment Zone and the provision of residential units that are in opposition to a number of Borough policies and the 2019 Local Plan. These positions appear to have been taken without even having gone through the process of an SPD. This is a serious flaw in the draft Design Brief that should be remedied, and a new consultation should be undertaken.</p> <p>Page 23 – You set out design principles that are either incompatible with the broader direction of your design brief or require further elaboration and consultation. For example, as has been noted above the current limited amount of commercial space cannot be construed as respecting the identity of the Employment Zone. Similarly, the provision of new homes is incompatible with the commitment not to compromise the Art School. You also mention the location of taller buildings, but the</p>	<p>number of smaller factories, breweries and warehouses.” It is agreed that this section should be edited to include description of the predominant built form, i.e. late-Victorian housing. The following text will be inserted: The bulk of the Conservation Area is made up of stock brick terraced housing built in the 1880s. The grid pattern of streets is tightly packed with terraces that are mostly two storeys with basements.</p> <p>This information regarding the site ownership and position is included for completeness and for information. It does not form part of the design brief.</p> <p>The quantum of commercial space and housing is not a matter for the design brief and is not specified in the design principles.</p>
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			community will have future opportunities to influence any potential project if and when a planning application is submitted to the Council.
23	Rosemary Baker	<p>This most recent document put out for consultation is a design brief, by definition essentially concerned with superficialities rather than the major issues on which the residents of the Lots Road area have made their views known to the Council on numerous previous occasions and the principles established in the RBKC Local Development Plan: that Lots Road south is a predominantly an employment zone and that “residential use in an Employment Zone should be permitted when the would allow for a significant uplift in the quantity and quality of employment space.”</p> <p>This Design Brief also carefully avoids mention of the elements in the proposed development that most worry local residents: namely the amount of housing to be crammed into this corner of Chelsea, the densities involved and the height of the proposed buildings.</p> <p>On initially reading the Brief I was unable to understand why the maps and illustrations only showed a part of the Lots Village Conservation Area but also an almost equal area of Fulham, on the other side of the railway tracks and in another borough, which can have no bearing on ours, until, that is, I got to page 28. In paragraph 2 page 28 you say “...the context to the south and west of the site is one of significantly taller buildings, either recently built, in development or consented. The Chelsea Island development on the southern side of the creek includes a 12-storey building while the closest building proposed in the Fulham Gasworks consented scheme over the railway line is a 28-storey tower that steps down to 21 storeys.”</p> <p>Is it then your plan, to use these grossly oversize buildings in Fulham as the excuse for building to a similar height in Chelsea, and if not in your</p>	<p>The design brief is conceived as a series of challenges to the designers/architects of a scheme, with each design principle having a rationale. Rather than seeking to be overly prescriptive or set minimum quantum of land uses, it is intended to allow the designers/architects flexibility to come up with creative solutions to achieve the outcomes sought by the local community, as captured in the workshops and via the consultation process.</p> <p>The site analysis maps are centred on the site, which lies to the far west of RBKC’s boundary.</p> <p>The design brief refers to building heights on page 17 as part of the site analysis. No specific building</p>

	<p>initial plan, then to be used at the stage when your experienced development partner appeals to the Inspectorate to build to greater heights?</p> <p>The Design Brief while speaking in almost estate agents tones of the futures possibilities for the extra care home, a key element in the development, avoids actually showing a specific location for this home.</p> <p>On page 10 in relation to the Class E designation, in discussion of potential employment uses, the Brief seems to suggest that these would be intended to be on the ground floor or basement area. Is this on the assumption that the Council simply expects the Auction House to re-establish itself there once the development is finished?</p> <p>On the same page in the list of possible community use the Brief includes medical/NHS services. Does the Council have a chemists shop in mind here, or is it really thinking of funding a GP practice?</p> <p>The brief includes a proposal (page 9, principle G) to build a bridge over the West London Line to connect with Fulham Gasworks development, which must add greatly to the costs of the Lots Road South Development. At previous consultations Chelsea residents have made it clear that they are not in favour of such a bridge, on the grounds that there are already routes into Fulham, why then is RBKC still including this, is it perhaps part of some agreement privily entered into with LBHF?</p> <p>On page 34 allowance is now being made for the “possibility” of a green route for cyclists and pedestrians alongside the railway. At the meeting held at Chelsea Academy on 26th November 2021 this possibility had been discounted. We must hope that if eventually included, this route mirrors</p>	<p>heights are included in the design brief, rather overall height principles (Design Principle 5) respecting the character of the street.</p> <p>Design Principle 14 sets out the requirements for the extra care homes. It is intentional that the design principles should not be overly prescriptive.</p> <p>These are extracts from the Leadership Team paper November 2021 and are reported for completeness. They are outside the scope of the design brief.</p> <p>Noted. This is not part of the design brief, but rather the site allocation.</p> <p>Noted. This principle was included as a result of community</p>
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	<p>the rural delights of the picture shown of Bath Spa and doesn't merely turn into another litter strewn strip beside a railway track, with brambles, buddleia and plastic detritus.</p> <p>On page 11 the Brief mentions that it is the Council's intention that there is to be a park in Cremorne Wharf and a street sweeper's permanent facility there. I suppose a place where street sweepers park their carts is a valid use of the word park, as in the term car park. From the initial planning designs for this permanent facility submitted to the Council some while ago, this facility will take up a large part of the Wharf site and be built alongside the river, to avoid Tideway's underground plumbing. It does not leave much area for a green space. Though the aspiration does help give the Council a cynical nod towards green credentials.</p> <p>Your vision of the future of Chelsea Creek, (page 33) includes providing a pedestrian route alongside the lock beneath the railway. Apart from greatly adding to the cost of the development is the idea here to build in opportunities for crime? To put it another way, would any RBKC councillor or planner working for RBKC encourage a teenage daughter to walk along this proposed pedestrian route alone at night?</p> <p>In Summation.</p> <p>Lots Road already has, or is in the process of having large housing developments constructed. It simply cannot take more, at an even greater</p>	<p>consultation. It is noted on page 34 that "While there are a number of challenges to realise such a route, a buffer zone should be safeguarded on site should off-site challenges be resolved."</p> <p>Due to the wharf being safeguarded for waste management purposes, any green space or park uses would need to be meanwhile or temporary uses that do not preclude the wharf being reused for waterborne freight-handling uses.</p> <p>The text on page 33 refers to a pedestrian walkway that forms part of the Chelsea Creek development which is outside the control of the Council. It does not form part of the vision of the future of Chelsea Creek within the design brief. Any planning application would be assessed against relevant design policies including CL2 a. vii. which requires development to be secure – designs out crime.</p>
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		<p>proposed density, regardless of the limitations of the area and infrastructure.</p> <p>Lots Road south is primarily an employment zone. It must remain so if Chelsea hopes to retain commercial activity and the prosperity this engenders.</p>	<p>This site has been through the local plan process and has been allocated in the adopted local plan (2019) for employment and residential uses. The constrained and built-up nature of the borough means there are very limited sites with opportunity for development.</p>
25	<p>Swifts Local Network: Swifts & Planning Group (Mike Priaulx)</p>	<p>Supportive of the draft design brief, but would like to see more specific details with regard to biodiversity: in addition to urban greening, measures for urban species such as swifts which are recorded on nearby King's Road and Fulham Road (records on RSPB Swiftmapper) and require nesting and roosting sites that are not delivered by urban greening or the net gain for biodiversity metric:</p> <p>"...integrated into facades... artificial nesting and roosting sites for bats, birds and solitary bees" in accordance with the Mayor of London's Urban Greening for Biodiversity Net Gain: A Design Guide (March 2021) (Design Opportunities: Facades, page 20), https://www.london.gov.uk/what-we-do/urban-greening-biodiversity-net-gain-design-guide</p> <p>This is also in accordance with the following policy documents: "artificial nest sites, that are of particular relevance and benefit in an urban context", as stated in policy G6 B4 of the London Plan 2021 (page 325), https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>"'swift bricks' and bat boxes" as stated in NPPG Natural Environment (2019) Paragraph 023, https://www.gov.uk/guidance/natural-environment</p>	<p>Noted; biodiversity net gain is dealt with by the Environment Act and it is therefore not necessary to require this in the design brief.</p>
26	<p>Zena Rawaf</p>	<p>Given the information given on possible plans for the council-owned site currently occupied by the Lots Road Car Pound (SW10 ORN), Lots Rd Auctions and warehouses; I have the following comments in relation to</p>	

		<p>the proposed development and possible designs / plans. I am a Lots Road resident and reside directly opposite the current car pound. I have been residing there for 15 years.</p> <p>It is unclear to what extent the proposed building will be a mixed-use development despite the reference to it in the consultation and whether the residential part of the development is unnecessary in an already extremely crowded space. A smaller proportion of residential would be more suitable given the expanse and possible height. And it would be more suitable to the character of the area to have lower stories where there are residential properties opposite.</p> <p>Planning Policy Statement 3: – paragraph 14 encourages Local Planning Authorities (LPAs) to promote designs and layouts which make efficient and effective use of land. Furthermore, when assessing design quality of a proposed development LPAs need to consider the extent to which the development is well integrated with, and complements, the neighbouring buildings and the local area more generally in terms of scale, density, layout and access. I have expanded on these issues below.</p>	<p>The site at Lots Road has a specific site allocation, Policy CA7, which allocates the site for “a mixed-use development to include residential and employment floorspace”. The quantum of different land uses (such as residential) is not specified in the draft design brief and is outside its scope. The resistance expressed by members of the local community with regard to a high quantum of residential compared to employment floorspace was noted in the workshop records. The proposed design principles apply to varying quantum of uses. Design Principle 5 deals with height of buildings in relation to the properties along Lots Road.</p>
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	<p>It would be preferable to have lower stories directly opposite the residential properties. Lots Road is relatively narrow.</p> <ul style="list-style-type: none"> - Loss of Privacy / Overlooking: With some of the proposed heights there would certainly be a loss of privacy with the residential properties opposite and in a dense manner (ie number of over looking properties in an already crowded space). Again Lots Road is relatively narrow. - Road Capacity: will be affected, there is already hazardous conditions (temporary traffic lights on lots road, unsafe & faulty crossings). Access will be heavily affected as will noise pollution from increased cars. Traffic would be over and above. Less stories less traffic – same for if more square footage given to employment space rather than residential properties. - Neighbouring Amenity: Quality of life would be severely affected for the residential properties opposite if canyonisation / loss of light and general wrong density / height for that area and part of the street. The proposed heights do not fit into the scope of the other buildings on lots road south. - Environmental Impact: Given the amount of development in this area (28 & 21 stories behind) / Chelsea creek / Chelsea waterfront / imperial wharf. - Landscaping: Has to fit the area. This ties in with the possible canyonisation if development is too high. 	<p>Any planning application that comes forward for the site will be required to have an accompanying CTMP (Construction Traffic Management Plan) and CMP (Construction Management Plan) that will deal with construction traffic as well as construction methods and noise and pollution as a result of construction. It would also be assessed against transport policies. See above.</p>
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		<p>Daylight & Sunlight:</p> <p>Daylight and Sunlight - as set out in the Building Research Establishment (BRE). This development if stories higher than its opposite neighbours will infringe on both daylight and sunlight in all factors, no sky line, daylight distribution / vertical sky component (VSC), average daylight factor (ADF) and Room Depth, for sunlight - annual probably sunlight house (APSH). It would be completely overbearing.</p> <p>The Vertical Sky Component with these proposed developments if overbearing would be 0% - ie it would cause a completely obstructed view of the sky if directly opposite and over twice the height of stories. (8 stories). Which is less than 27%</p> <p>Sunlight availability may be adversely affected. Rights of Light Act 1959 Loss of essential light and needs to be guided by the numerical tests set out in the Building Research Establishment (BRE) guide "Site Layout Planning for Daylight and Sunlight" 2011.</p> <p>Bear in mind future objections of physical obstructions and severe interference with right to light. The light in this area / neighbours has been enjoyed for well over 20 years.</p> <p>General Light for whole of Lots Road: Lots Road South has enjoyed fantastic light for many years; with the proposed development and others in surrounding area there would be darkness and overshadowing. A good example being Lots Road Pub which is already has almost 80% of light blocked. This location used to enjoy full sunlight all day.</p> <p>Agree that the height if the building must respect the scale of the property opposite especially residential.</p> <p>Proposed Courtyard:</p> <p>May have detrimental impact as it may force the higher stories to be closer to nearby properties to allow for the courtyard.</p>	<p>Any planning application will need to also ensure acceptable levels of daylight/sunlight to surrounding existing development.</p>
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		<ul style="list-style-type: none">- 7/8 stories is much too high especially if all the way or opposite the residential properties. It would certainly create an unpleasant street experience, and the light that comes into Lots Road / (ruining it / long standing character)- Lots Road is too narrow. You say to avoid canonisation but 7/8 stories would certainly create this especially given the new 8 story development in front of lots dining pub next to the power station this means height at the front and back of the residential property (at 114-118 -)- Kings Road not that high - would totally ruin character of area, made of many locals and long standing residents	<p>The design brief refers to building heights on page 17 as part of the site analysis. No heights are specified within the design brief itself.</p>
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