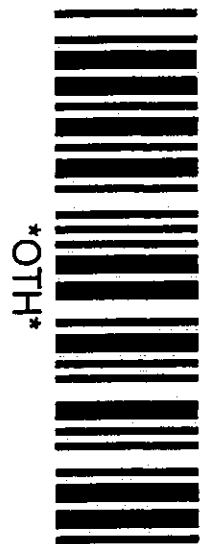


**ROYAL BOROUGH
OF
KENSINGTON & CHELSEA**

DOCUMENT SEPARATOR

DOCUMENT TYPE:

OTHER



OTH

58

Lots Road Power Station

part in the Royal Borough of Kensington & Chelsea and
part in the London Borough of Hammersmith & Fulham

planning application no. DPS/DCWS/PP/02/1324&1325/J

2002/1366/P & 1368/P

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000 – strategic planning application stage 1 referral

Redevelopment and conversion of the existing power station for residential (69,073sqm), A1, A2 and A3 retail and restaurant use (2115 sqm), B1 office and commercial use (6459 sqm) and development of new residential flats adjacent to Chelsea Creek to include one 98m high tower (30 storeys) and one 70m high tower (25 storeys) and the provision of basement level car parking within the refurbished power station comprising 656 car parking spaces (582 for the private residential and 74 for the affordable accommodation); providing an on site total of 866 residential units with 368 being affordable (42%).

Context

1 On 25 June 2002 Hammersmith & Fulham Council and on the 2 July 2002 Kensington & Chelsea consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under Category 1A (a) and 1C(a) of the Order 2000: *"the provision of more than 500 flats"* and *"the building is more than 25 metres high adjacent to the River Thames"*.

3 If Hammersmith & Fulham and Kensington & Chelsea Councils subsequently decide that they are minded to grant planning permission, they must first allow the Mayor an opportunity to decide whether to direct them to refuse permission.

4 The Mayor of London's comments on this case will be made available on the GLA website www.london.gov.uk.

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Site description

5 The site comprises a substantial Edwardian (1905) power station building which is neither listed nor located within a conservation area, although the neck of Chelsea Creek and the riverside are in the Thames Conservation Area. The site is bounded by Lots Road to the north, the SITA waste transfer station to the north-east, the Thames to the east and Chelsea Harbour to the south and south-west. The local authority boundary between Kensington & Chelsea and Hammersmith & Fulham runs along the middle of the creek. The power station rises to approximately 40m in height comprising a boiler house and parallel turbine hall. The power station originally had four chimneys, of which two have been part demolished. The remaining chimneys rise to about 85m in height. The building was completed in 1904 and occupies one side of the creek. The opposite side is currently vacant where it adjoins the Chelsea Harbour development. The site is accessed from Lots Road, with fuel to power the turbines originally having been delivered from the creek. The power station takes a substantial amount of water from the Thames, which is heated and then discharged, back into the creek. This has prevented the creek from silting up and has also produced a unique ecology within the creek. The site is no longer required for LUL's generation requirements although the western part of the site will be occupied by a Bulk Supply Building, which takes power from the national grid. The site is completely inaccessible to the public and the creekmouth is one of the most impressive and interesting locations in London.

Details of the proposal

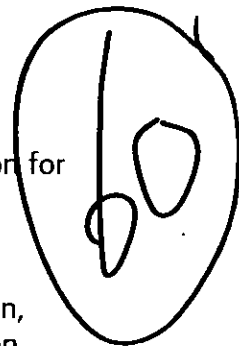
6 The existing power station will be largely retained and converted into primarily residential use at upper floor level with commercial and retail uses at ground and first floor levels. A large open mall space will be created in the centre of the building and this will be accessible to the public and will form part of a pedestrian linkage through to the creek. On the other side of the creek a series of residential buildings are proposed of 8/10 storeys. Two landmark towers will mark the entrance to the creek. The banks of the creek will be altered to incorporate a tidal habitat and water will continue to be pumped to the head of the creek to ensure that it does not silt up. Provision will be made for the Thames Path to be extended through the site. A package of associated transport proposals is outlined later in this report.

Case history

7 On 2 April 2002 Hammersmith & Fulham Council refused planning permission for the "demolition of buildings ancillary to the Lots Road Power Station and redevelopment to provide 255 units of residential accommodation together with 238 ancillary car parking spaces and a restaurant (class A3), public open space and associated works to Chelsea Creek and Chelsea Basin including the construction of three bridges over Chelsea Creek. This proposal offered approximately 35% affordable housing on the Hammersmith & Fulham side, and included two residential towers of 25 storeys (70 metres high) and 39 storeys (130 metres high).

8 The reasons for refusal were failure to meet the Council's policies in respect of affordable housing, design, amenity and transport. In particular, the proposed development was considered unacceptable due to its height, massing, siting and relationship to existing development and because of the harm it would cause to local views and in particular views from the river walk. The scheme was also considered to fail the open space policies in that the public open space should relate to the Nature Conservation area of Chelsea Creek. The proposals were also considered to harm the amenity of the occupiers of Chelsea Harbour in terms of impact on daylight and overlooking by reason of the proximity, height and massing of the scheme, to generate an unacceptable impact on the local highway network; provide insufficient amenity

space for the occupiers of dwellings; insufficient affordable housing; and make no provision for the education of children residing in the development.



9 On 22 March 2002 Kensington and Chelsea refused planning permission for the "Demolition of a series of buildings currently ancillary to the operation of the power station, redevelopment including conversion of power station to provide residential accommodation, class A1 retail Class B1 Offices, Class D Community uses and ancillary residential uses including health and fitness centre with works to Chelsea Creek and Chelsea Basin, including construction of three bridges over the creek"

10 There are no extant planning permissions on the Kensington and Chelsea site. A planning brief was completed for the site in February 1999.

11 The Hammersmith and Fulham side of the site has an extant planning permission for the completion of the last phase of the Chelsea Harbour development. This consent would not deliver any affordable housing on the site and would result in fewer residential units being built on the site than the current proposal.

Relevant strategic planning policies

12 The following policy sources were taken into account in the preparation of this report.

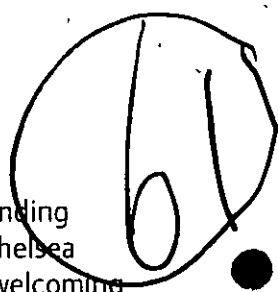
- Draft London Plan (June 2002)
- The Mayor's Transport Strategy (July 2001)
- The Mayor's Draft Biodiversity Strategy
- London Economic Development Strategy, (July 2001)
- PPG1 (General Policy and Principles)
- PPG3 (Housing)
- PPG9 (Nature Conservation)
- PPG15 (Planning and the Historic Environment)
- RPG3 (Strategic Guidance for London)
- RPG3B/9B (Strategic Planning Guidance for the Thames)

Analysis of strategic planning issues

Design – Tall Buildings & Views

13 In response to the refusals of planning permission the applicant has reduced the height of the tower in the Kensington & Chelsea site by 9 floors to 98m (previously 39 storeys at 130 metres high). The height of the buildings which face onto Lots Road is also likely to be reduced in response to concerns about the amenity of the residents who live on the north side of the road. The height of the tower in Hammersmith & Fulham remains unchanged at 70 m. The amount of open space within the Hammersmith & Fulham site has been increased through the deletion of one of the residential blocks.

14 The site is currently inaccessible to the public and forms a barrier to the completion of the Thames Path. The scheme establishes routes through the site and towards the river and in addition provides for the creation of significant public spaces in the form of a glass roofed public street within the Power Station and an open space adjacent to the creek and riverside. These elements are substantial public realm gains.



15 It is considered important that the new development knits well with the surrounding development, including the completed Chelsea Harbour scheme and Lots Road. The Chelsea Harbour scheme was completed in the late 1980s and is a very inward looking and unwelcoming development with few links to the wider townscape. The Lots Road scheme offers the opportunity to open up visual and spatial linkages into Chelsea Harbour. It is considered that the re-alignment of the one of the residential block HF 02 and the footbridge beyond it would provide a simple direct visual link between the creek and the Chelsea Harbour basin along the axis of Thames Avenue. This would provide for a sequence of open spaces between Lots Road, the creek, the new public square within the development and finally the Chelsea Harbour basin. Similarly, the visual permeability and legibility of the scheme could be enhanced by opening a view and direct pedestrian route from the existing Chelsea Harbour access bridge into the new riverside open space. Pedestrians arriving into the scheme from this part of Lots Road would then have a direct and clearly understandable route to the river in addition to route along the creek itself.

16 A new landscaped environment will be created adjacent to the creek in the form of a publicly accessible linear park, which will promote wildlife habitats. The basin at the top of the creek will be cleared of debris and turned into an ecological resource and educational facility for local schools.

17 Lots Road will be re-landscaped with traffic calming and planting introduced and an active colonnaded street frontage with retail and commercial uses to replace the current blank façade at ground floor level. Car parking on the site is located below ground level primarily in the existing basements of the power station enabling a car free pedestrian environment at ground floor level.

18 Although not listed the Lots Road Power Station is a major London landmark and a building of considerable architectural and historic interest and as such its integration within the scheme is considered both imaginative and welcomed. In addition its reuse is considered a more sustainable approach to redevelopment than demolition. The building will be cleaned and sample panels already completed indicate that the external appearance of the building will change quite dramatically from its current dark and soot stained finish. The internal street will be of a similar scale to the Bankside Tate and the blank panels to the main elevations, which were originally glazed, will be opened up again to give the building a much lighter appearance. One of the chimneys is to be adapted to take a public viewing platform.

Tall Buildings & Views

19 The new residential build on the east bank of the creek has a subservient scale to the main power station building, comprising sequential blocks of 8 storeys in height and bridges across the creek linking the two sides of the development and maintaining the permeability of the entire site. The blocks are bracketed by a 26 storey tower at one end and a 12 storey tower at the other.

20 Two landmark towers are proposed at the mouth of the creek, one of 98m in height (30 storeys) and the 70m in height (25 storeys). The tower on the Kensington & Chelsea site has been reduced in height in response to the earlier refusal of planning permission. It is considered regrettable that the original proposals have been amended in this way as the original tower and its partner on the Hammersmith & Fulham site were considered to make a positive and dramatic contribution to the London skyline and their Thames-side setting. The towers as originally conceived had a good compositional relationship to the monumental scale of both the Lots Road Power Station and the River Thames. These towers still have an aero-foil like shape, the

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long axis being parallel to the power station and the slim leading edge facing the long river view. The Kensington & Chelsea tower remains the taller tower located on the east bank and the shorter tower on the west bank. The Montevetro development is located on the south bank of the Thames opposite to this site and it is the architect's intention to create two buildings of equally high quality which will compliment and enhance the both the riverside setting and the setting of Lots Road power station.

21 The towers are intended to exploit the long views along this part of the river, which is very wide at this point; and they are at the head of a long straight section stretching almost to Vauxhall. The towers are intended to create a balanced composition with the existing power station and its chimney stacks. The towers are relatively slim when compared to contemporary commercial tower developments and are of approximately the same profile as the Montevetro development.

22 The towers would in long views of the river be seen as part of a cluster with the existing Chelsea Harbour tower and the towers of the World's End Estate. In principle, towers of high design quality in this location would be appropriate, as they would enhance the skyline and the riverside setting. The detailed design of the towers has been amended as a result of the consultation process and is now more modelled than the original with the use of terracotta panelling and further articulation of the top of the buildings. The approach being taken of producing slim towers orientated towards one of the principle views of the site is considered to be the right one. The towers were originally located on mounds at their base. This aspect of the scheme has been amended and the towers now arrive at ground floor level and this is considered to better integrate the towers into the surrounding public spaces. The towers are considered to represent outstanding pieces of built form and architecture that will enhance the dramatic riverside setting and views along the Thames whilst complimenting the prominence of the historic power station building. The towers are in accordance with the Mayor's draft London Plan policies on tall buildings and his earlier Interim Guidance issued in October 2001 in terms of their siting, high architectural quality and visual impact. In strategic terms, the towers will make a significantly positive impact on London's skyline and views of the River Thames.

Transport and intensification

23 One of the key issues for the site is its accessibility and the density of development, which can be accommodated on the site. The draft London Plan identifies the site as one, which can accommodate more than 100 units (Map2A.4). The site is also identified as having a relatively low access to public transport, which has been confirmed by TfL. In terms of the sustainability of development, the draft London Plan seeks to optimise "the use of previously developed land and vacant or under used buildings" (policy 2A.6) and to direct development to "previously developed sites and buildings within the urban area that are or will be served by public transport" (Policy 2A.5). Policy 2A.6 goes on to state that local authorities should seek amongst other criteria to ensure that "Development occurs in locations that are currently, or are planned to be, accessible by public transport, walking and cycling" whilst taking into account "the capacity of existing or planned infrastructure including public transport, utilities and community infrastructure".

24 The draft London plan aims to maximise the potential of sites as set out in Policy 4B.3 and residential densities are set out in Table 4B.1. Such developments "should conform to the density ranges set out in Table 4B.1". For sites with a PTAL accessibility index of up to 3, a maximum density of up to 450 habitable rooms per hectare is proposed.

25 If site density is calculated on the basis of the site area plus 6m of river and road and the entire creek and basin, as is done by the developer the site comprises 4.92 ha and has 2559

habitable rooms giving an overall density of 520 hr/ha. The draft London Plan states that "residential density figures should be based on gross residential area, which includes internal roads and ancillary open spaces." If the Thames is excluded from this calculation and the creek and the basin are counted as ancillary open spaces this reduces the site area to 4.78 hectares and produces an overall density figure of 535 hr/ha. If the external roads are also excluded from the calculation the site area is 4.58 ha and the density figure increases to 559 hr/ha.

26 TfL has identified that with the proposed bus improvements the site would have an accessibility index of three and that if the West London Line "Orbi-Rail" scheme were to be completed this would increase to 4. The range identified for urban sites with an accessibility of four to six is 450-700 hr/ha. The draft London Plan states that "Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL)." Site setting can be defined as central, urban and suburban depending on the density of existing development and the mix of different uses. This site is considered to be "urban", given the density of development, which surrounds it, and its inner London location. Although the site is not within 10 minutes walking distance of a town centre, Fulham Broadway is approximately 20 minutes from the site. If the sites PTAL level could in the medium terms be increased to 4 then an overall site density of 559 hr/ha is considered to conform with the proposed accessibility and density levels set out in the draft London Plan, taking into account both the existing and potential accessibility of the site and its urban location. A less dense development limited to 450 hr/ha would not take into account potential improvements to the sites accessibility over time and would fail to maximise the site's potential, forgoing the opportunity to deliver a substantial contribution to London's affordable and private housing stock in a central urban location.

Affordable housing

27 In response to the refusal of planning permission on the site the applicant has increased the overall level of affordable housing provide within the scheme. The affordable housing offered on the site is as follows.

Hammersmith & Fulham Site

28 The scheme proposes 50% affordable housing with 32% social rented and 18% intermediate housing in the form of key worker housing. The mix of tenure types is as follows:

	<u>current scheme</u>	<u>refused 2001 scheme</u>						
Total units	444	464						
Private units	222	314						
Affordable	222	150						
		Studio	1 Bed	2 Bed	3 bed	Pent-house	Total Units	% total
Private								
units	0	33	126	47	15	221	50%	
habitable rooms	0	66	378	188	75	707	58%	
RSL								
units	0	86*	50**	6	0	142	32%	
habitable rooms	0	172	150	24	0	346	29%	
Key Worker								
units	32	16	32	0	0	80	18%	
habitable rooms	32	32	96	0	0	160	13%	
*** total affordable								

habitable rooms						506	42%
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- * includes 44 units for the elderly
- ** includes 8 units for the elderly
- *** excluding kitchens and bathrooms as habitable rooms.

29 The RSL housing is primarily one and two bed with only 6 three bed units being provided. The bias of affordable housing in the proposals is towards smaller one and two bed units. This is in part as a result of providing smaller affordable units specifically for the elderly.

30 The draft London Plan seeks the target provision of up to 50% affordable housing in redevelopment schemes. Policy 3A.7 states that "In reviewing UDPs boroughs should seek the maximum reasonable amount of affordable housing. They should demonstrate that they have set an overall target for the highest number of affordable homes to be provided taking account of regional and local assessments of need, the promotion of mixed and balanced communities, and potential sources of supply...". Policy 3A.8 identifies the level of affordable housing that will be sought in individual schemes. Indicative affordable housing targets for the boroughs are set out in table 3A.3 and for Hammersmith & Fulham this is 50%. Policy 3A.8 states that in negotiating affordable housing, borough councils should apply these targets sensitively, taking into account site costs, economic viability, including the availability of public subsidy and other planning objectives. There will be some sites that are capable of achieving more than the indicative affordable housing target and some less.

31 Hammersmith & Fulham Council produced a housing needs survey in March 1999. This found that households requiring larger properties (of three bedrooms or more) were disproportionately in need. On the basis of this housing needs survey the scheme would not appear to address the greater need in Hammersmith & Fulham for larger sized affordable housing units. Additionally, the emerging Hammersmith & Fulham UDP seeks to ensure that "a mixture of units of different sizes is provided to meet the needs of family and non-family housing" (H06 (b)). However, the provision within the scheme for housing for the elderly does potentially address this issue in part as Council family accommodation which is currently under-occupied could be freed up by offering tenants transfers to this scheme. In addition, there is a current consent for the redevelopment of this site which does not deliver any affordable housing and which could be implemented. Potentially therefore a scheme may be implemented on the site which delivers no affordable housing at all.

32 Hammersmith & Fulham's emerging UDP policy in respect of affordable housing states that there will be a presumption in favour of its provision in residential development and that the proportion of affordable housing provided will be determined by "*having regard to the overall level of need for affordable housing in the Borough at the time of the application and: [the overall monitoring target of 65% of all new housing and] the need to achieve a successful [residential] development*". There is no up-to-date housing needs survey of the borough and the 65% target is an overall monitoring target rather than a target, which needs to be applied absolutely to each individual site.

33 The existing site is a relatively high value location. More information is required if a development appraisal is to be carried out to assess the cost of contamination and to test if the provision of 65% affordable housing on this site would be likely to make the scheme unviable and that the provision of a 50% is a more reasonable target in such circumstances.

34 If the amount of affordable housing provided is calculated on a habitable room basis rather than a unit basis the split on site is 57% private and 43% affordable housing (see the

above table). There is however, no requirement in the Hammersmith & Fulham UDP nor the emerging London Plan to measure affordable housing on this basis.

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35 The proposals are considered to meet the broad policy direction of the draft London Plan as they provide for 50% affordable housing split between 32% social rented accommodation and 18% intermediate housing, and the overall increase in the provision of affordable housing on the site from the scheme which was refused planning permission, is welcomed. However, given the housing need identified in Hammersmith & Fulham's own housing needs survey it would be appropriate to support Hammersmith & Fulham if they wished to secure a higher percentage of family units within the overall scheme up to 50% provision overall.

Kensington & Chelsea Site

36 The scheme proposes 34.5% affordable housing overall, comprising 21.5% social rented and 13 % intermediate housing.

	<u>current scheme</u>	<u>refused 2001 scheme</u>
Total units	422	448
Private units	276	312
Affordable units	146	136

	Studio	1 Bed	2 Bed	3 bed	Pent-house	Total Units	% total
Private							
units	0	20	158	87	11	276	65.5%
habitable rooms	0	40	474	348	55	917	73%
RSL							
units	0	28	50	13	0	91	21.5%
habitable rooms	0	56	150	52	0	258	20.5%
Key Worker							
units	40	7	8	0	0	55	13%
habitable rooms	40	14	24	0	0	78	6.5%
total affordable						336	26.5%
habitable rooms							

37 The bias in the provision of affordable units within the scheme is towards two and one bed units. The key worker provision on the site comprises primarily studio accommodation.

38 Kensington & Chelsea Council's Adopted UDP (25 May 2002) identifies that if its affordable housing target is to be met *"the large sites in the Schedule of Major Development Sites (of which Lots Road is one) should provide a higher proportion (i.e. more than one third) of affordable housing...."* (paragraph 5.5.10a). As a minimum, sites should provide at least a third affordable housing (paragraph 5.5.10c). In terms of units provided the current scheme meets the UDP's minimum requirements (of no less than 33%). However the site is one of the borough's major development sites and clearly it does not provide the higher proportion of affordable housing sought by the adopted plan policy and is lower than the indicative target of the draft London Plan policy. The mix of units is broadly in line with the draft London Plan policy. The developer has identified the considerable costs associated with the decontamination of the site and the uncertainty as to the ultimate cost of that process as a reason, which mitigates against the provision of a higher figure for affordable housing on the site. The developer has not provided viability information to back up this case. The developer estimates

that it will cost £30 million to decontaminate the site including contingencies. Of this £25 million will be required to clean up the Kensington & Chelsea site comprising: -

- Decontamination £2 million
- Abnormals £3 million
- Power Station decommissioning £16 million
- Total £21 million
- Plus contingency at 20% £25 million

39 The Three Dragons Report "Affordable Housing in London" considered the issue of remediation and its impact on the provision of affordable housing at a borough wide level. It stressed that the figures contained in paragraphs 6.30 to 6.34 were indicative only and that remediation costs could vary significantly on a site by site basis. The applicant has stated that whilst the Three Dragons report Applied notional contamination figures of £500,000 per acre and £5,000 per unit for planning obligation costs in order to achieve 50% affordable housing, the actual expenditure at Lots Road is estimated to be £25 million over a 4 acre site, £23 million more than estimated in the Three Dragons Report, primarily resulting from the cost of the decommissioning of the power station itself. The applicant also estimates that the cost of providing the units will be closer to £20,000 per unit rather than £5,000.

40 In the absence of viability information it is difficult to arrive at a robust view on the proportion of affordable housing that could reasonably be sought on this site, not to consider whether decontamination costs were actually reflected in, and absorbed by, a lower than otherwise land value. In principle, the disposer of the land should bear these costs, thus enabling the full affordable housing package to be provided.

Environmental Impact Assessment

41 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of the case.

42 It is considered that the applicant should have regard to the safety implications of the switching station for new development, which does not appear to have been covered in the statement.

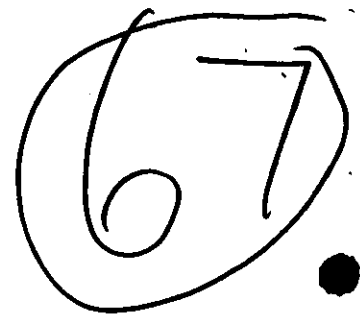
Biodiversity

43 The site, especially Chelsea Creek, is of significant biodiversity interest. This interest will change, and almost certainly decline, as a result of the closure of the power station, and the impact of the proposed development must be viewed in this context.

44 The landscape proposals for the development, especially the intertidal terraces and green roofs, will potentially be of major benefit to biodiversity.

45 A few areas where the proposals could be further improved are as follows:

- Consider screening some of the creek to reduce disturbance to birds.
- Reduce or simplify the planting in the intertidal terraces.
- Consider reducing the amount of shrub planting to benefit black redstarts.
- Institute a monitoring scheme for the green roofs.



Blue Ribbon Network (draft London Plan 2002)

46 The site lies within the draft London Plan's Blue Ribbon Network and a number of riverside policies apply. The proposals conform to a number of policies in the Plan but in the event of planning approval it will be important to ensure that the good intentions set out by the applicant in supporting statements to the application are realised, e.g. river transport and surface drainage.

Local planning authority's position

47 Hammersmith & Fulham Council has not officially confirmed its views on the current planning applications other than that it is likely to consider the scheme at a planning committee on 11 September 2002, which coincides with a local ward bi-election. Informally, officers have indicated that the applications will be recommended for refusal. Officers have previously maintained that 65% affordable housing should be provided on the site and that overall density levels should be reduced, both to increase open space provision on the site and reduce pressure on the surrounding road network and to be in line with the density proposals in the draft London Plan.

48 Kensington & Chelsea Council is likely to seek a higher proportion of affordable housing on the site in line with its recently adopted UDP policies. The Council is also concerned about the impact of a high density development on the surrounding road network and have yet to be convinced that this can be ameliorated by the provision of improved bus facilities. In design terms Council officers have sought a reduction in the height of the residential tower on the creekside and also a reduction in the height of the buildings, which face onto Lots Road.

Views of TfL

Site accessibility

49 The site currently has relatively poor public transport access when calculated using the conventional PTAL method (level 2). However, this reflects the site location on the river and the long walk distances to rail facilities. Improvements planned to bring bus services closer to the site and improve frequencies will raise the PTAL to level 3. Because of current uncertainty the applicants have not taken account of the improved accessibility provided by the proposed Chelsea Harbour West London Line station although this could further raise the PTAL to level 4. Improvements to river bus services are also proposed although these are not included in PTAL calculations.

50 Although beyond the walk distance used in PTAL calculations, there are three Underground stations close to Lots Road. Fulham Broadway is the closest although it is still a 15 minute walk from the site. The station is on the Wimbledon branch of the District Line. West Brompton station is a 20-25 minute walk from the site and is on the same branch. Additionally, West Brompton station offers access to rail services on the West London Line. Earls Court station providing connections to all District Line and Piccadilly Line services is approximately 20-25 minutes walk from the site although it can also be reached on the C3 bus service.

Transport proposals

51 A package of transport improvements known as the Sustainable & Integrated Transport Strategy (SITS) has been put forward by the applicants to address the impacts of the

development. These have been discussed in detail with officers at the boroughs and TfL. Details of the final transport package will be included in a Section 106 Agreement.

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52 The SITS appears to be a genuine attempt to encourage walking, cycling, rail, bus and river travel in place of car use. The applicants have allocated a total budget of £5 million to fund the package, as follows:

• Embankment bus service	£1 million
• C3 frequency enhancements and extension to the north of Earls Court	£500,000
• Bus priority measures	£600,000
• Bus stop improvements	£200,000
• Improvements to the bus gate	£50,000
• Contributions to upgrading West London Line station	£1 million
• Cycle path improvements	£410,000
• Pedestrian improvements	£200,000
• Improved access to Chelsea Harbour pier	£200,000
• Green Travel Plan measures	£120,000
• School Travel Plan measures	£120,000
• Environmental cell	£400,000
• Lots Road/Cremorne Road junction	£200,000

53 The costs have been provided by the applicants and although TfL is satisfied that they were a fair estimate at the time the application was submitted, further work will be needed to ensure that the funding will enable all the elements listed in SITS to be delivered. Some of the costs to implement the SITS are uncertain and are likely to increase. In particular the costs of providing improved bus services are based on tender prices current at the beginning of 2002. London Buses has estimated the net deficit funding required to support the proposed Embankment bus service is over £1.1 million. Tender prices are rising rapidly and so the overall funding for bus service improvements will need to be increased to reflect this. More generally, some form of index linking will be required to ensure rising costs are taken into account.

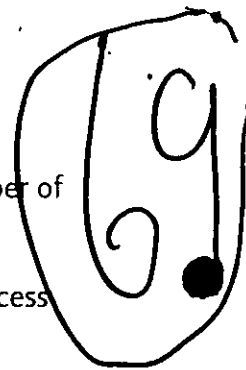
54 There is current uncertainty surrounding plans for the station on the West London Line. The applicant proposes that the £1 million funding earmarked to upgrade the station should be reallocated to other elements of the package if the station does not proceed within eight years. TfL believes that any funding which cannot be used or isn't needed for the intended purpose should be reallocated to other elements in the SITS. It will be very important that the Section 106 agreement provides both clarity and flexibility. The Agreement will need to provide sufficient assurance that all elements of the package can be provided whilst also providing certainty regarding the amount of funding required.

55 In addition to SITS a number of transport measures are proposed as part of the development. These are estimated to cost a further £3 million and include pedestrian and cycle routes through the site, relocation of on-street parking and provision of a travel centre, subsidised premises for a bike shop and a home delivery pick-up point.

West London Line

56 The West London Line passes close to the western boundary of the site. The closest existing station is West Brompton, approximately 1.5 km from the site. A Rail Passenger Partnership (RPP) bid was submitted to the SRA in February 2000 to fund a package of

enhancements to the West London Line. This is still under consideration although a number of issues remain unresolved and are delaying the outcome of the RPP bid.



57 As part of the improvements a new station at Chelsea Harbour is proposed with access from both Chelsea Harbour Avenue and Townmead Road. The developers of the adjacent Imperial Wharf site are providing funding for these station works through a Section 106 Agreement.

58 There are ambitious proposals to upgrade the West London Line as part of the Orbirail concept outlined in the Transport Strategy. This envisages a network of rail services providing frequent orbital links. To realise the proposals for Orbirail it would be necessary to upgrade the proposed four-car platform to an eight-car platform.

59 At the request of TfL the applicant's consultants are carrying out a feasibility study into doubling the size of the proposed Chelsea Harbour station to accommodate eight car trains. Stage one of this work is now completed and has concluded that there is sufficient space for platform lengthening. The second stage of the study is examining land ownership and operational constraints.

60 £1 million of the overall SITS package has been pledged towards West London Line improvements when the station at Chelsea Harbour is constructed. This could provide funding towards the station upgrade works although the total cost of these works is unclear at this stage. If the station plans do not proceed within eight years this funding could be reallocated to other elements in SITS.

Bus services

61 A number of service improvements have been put forward by the applicants and discussed in detail with London Buses.

C3 service

62 Existing route C3 linking the site to Earls Court will be increased in frequency from 6 to 8 buses per hour. The service will be diverted via the eastern arm of Lots Road to serve the development site more directly. Proposals for improvements to the C3 meet London Buses' criteria and their inclusion in the transport package is supported. London Buses has also suggested it may be appropriate to consider a northward extension of the C3 service to Shepherd's Bush, Hammersmith or White City. Extension proposals will need to take into account the availability of stand space.

Embankment service

63 The proposal for a completely new bus service linking the site to Pimlico and Westminster along the Embankment is supported in principle. Work done to date suggests that this service is likely to meet London Buses' planning and financial criteria. However, a full evaluation of the costs and benefits will be needed once some of the uncertainties are resolved surrounding the impact of the proposed congestion charging scheme and the future opening of the West London Line station at Chelsea Harbour. Adequate standing space would need to be identified at both ends of the route. TfL understands that potential stand locations have been identified by the applicant although these would need to be confirmed closer to the start date.

Other bus service proposals

64 A number of alternative bus service proposals put forward by the applicants have been evaluated by London Buses. These include changes to route 19 and an extension to route 328. However, these changes are unlikely to be an effective use of the available transport subsidy and are not supported. Some of the objectives of providing improved local links could be better achieved through extensions of the C3 service.

65 London Buses intends to review the package of bus service enhancements in spring 2003 with a view to firming up details at that stage.

Highways

66 A new signal-controlled junction incorporating improved pedestrian facilities is proposed for the junction of Lots Road with Cremorne Road. This will introduce a degree of delay to through traffic on Cremorne Road. Some localised widening will be required to provide the necessary capacity at the junction. In order to maintain an adequate footway width, some frontage land owned by RB Kensington & Chelsea (currently paved but not dedicated as footway) may need to be acquired. This can be confirmed when the applicant submits revised drawings for the junction. The £200,000 allowance for junction works appears to be realistic excluding any potential land acquisition costs.

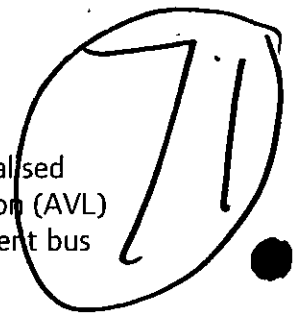
67 TfL Street Management has examined the impact of the proposed development on the Transport for London Road Network (TLRN). The methodology used in the Transport Assessment is similar to the approach used for the adjacent Imperial Wharf development. The analysis assumes a worst case scenario and takes no account of the improvements proposed in the transport package. TfL accepts this approach, which provides a robust basis for assessing the impact of additional traffic on the strategic road network. However, TfL is aware that a number of detailed points regarding the analysis of traffic impact in the Transport Assessment have been raised by the Chelsea Harbour Residents' Association. These include the need to present the results of surveys of traffic queues, as well as a more detailed justification for residential trip rates and the assumption that improvements resulting from the adjacent Imperial Wharf development will lead to a reduction in trips. TfL has requested additional information from the applicant's consultants to address these issues, which should have been presented as part of the Transport Assessment. Despite these detailed concerns, the impact of the development on the TLRN is considered acceptable.

68 An environmental cell and 20mph zone is proposed for local roads. This is supported in principle but any traffic calming measures would need to be 'bus friendly'. The use of speed tables is favoured rather than speed cushions for roads with high levels of on-street parking. Speed tables should meet the London Buses Guidelines for Traffic Calming on Bus Routes. The relocation of on-street parking from the south side of Lots Road is welcomed, as this will reduce conflicts for buses. The associated widening of pavements should enable a bus shelter to be provided.

69 It should be noted that Kensington & Chelsea Council has high design standards and will need to give approval for works on borough roads. This may lead to higher than anticipated costs for measures to support the proposed environmental cell and 20mph zone. The estimated cost of £400,000 may need to be increased to reflect this. It will be important that increased costs in this area do not prejudice other elements of SITS.

Measures to assist buses

70 Bus priority measures will be provided at the Lots Road/Cremorne Road signalised junction in the form of Selective Vehicle Detection (SVD). Automatic Vehicle Location (AVL) beacons to track bus movements could be installed along the route of the Embankment bus service as well as SVD at a number of traffic signals.



71 The applicant is also willing to fund the installation of bus lanes along the Embankment.

72 These would need to be designed such that there was sufficient roadspace for queuing displaced traffic without blocking upstream junctions. TfL is due to consult shortly on plans for a segregated cycle lane along the south side of Chelsea Embankment and Cheyne Walk. Cycle lanes need not preclude the installation of bus lanes, although ideally they should be 4-4.5m wide to allow buses to overtake cyclists.

73 The feasibility of bus lanes along the Embankment would need to be investigated further once the Central London Congestion Charging Scheme is operational and the cycle lanes are installed. TfL would want flexibility so that funding earmarked for bus priority measures on the Embankment could be diverted into other elements of the SITS if the priority measures are not implemented.

74 The existing bus gate on Townmead Road increases delays to buses because it is controlled by video and intercom and response times can be very slow. The applicant proposes to fund installation of SVD at the bus gate to enable an approaching bus to be identified and automatically raise the barrier. This improvement is strongly welcomed.

75 It is disappointing that additional bus standing space is not being provided as part of the development, given the acute shortage in this area of London. The need for bus standing space should be considered as part of any revised plans for the proposed interchange at the new Chelsea Harbour station.

Measures to assist pedestrians/cyclists

76 A number of measures to assist cyclists in the area around the development site are outlined in the SITS. These include improvements to the Thames Cycle Route, new cycle lanes, cycle crossing facilities, advanced cycle stop lines, signage and additional cycle parking at key destinations. These are all welcomed.

77 The proposed cycle pool for residents, subsidised premises for a cycle shop and the provision of community wide cycling proficiency training is described in the Green Travel Plan. These are all recognised as innovative schemes that are welcomed by TfL.

78 Above ground, secure residents' cycle parking is proposed. This should be provided for every unit in accordance with the London Cycle Network Design Manual. In addition accessible, cycle parking is proposed in communal areas and adjacent to public transport facilities, shops and amenities.

79 Pedestrian improvements proposed as part of the SITS are also welcomed. These include additional dropped kerbs and tactile paving at locations around the site, improved crossing facilities at Lots Road/Cremorne Road and on Kings Road, new pedestrian signs and improved permeability of the site. Pedestrian permeability will be improved through extensions to the Thames Path, new public open space, improved links to the river and new bridges across the creek. It is recommended that the new bridges are designed for joint pedestrian and cycle use.

80 Work will now need to take place to agree a deliverable package of schemes between the applicants, boroughs and TfL. It will be important that routes to public transport facilities are given a high priority.

Green Travel Plan

81 A series of measures are proposed including:

- Appointment of a Transport Manager who would be employed as part of the management team to oversee the implementation of the Green Travel Plan;
- Requiring private residents to pay £200 as part of the service charge to be used for public transport journeys (in effect compulsory part purchase of a Travelcard);
- Provision of a cycle pool for residents and the local community;
- Affordable accommodation for a bicycle shop;
- Community wide cycling proficiency and education scheme;
- Car journey share scheme;
- Car hire facilities;
- Car share pool;
- Taxi and minicab proposals;
- Sponsorship for six School Travel Plans;
- On-site transport information centre;
- Internet website with travel information;
- Internet shopping collection points.

82 This innovative package of measures appears to demonstrate a long-term commitment by the applicant. TfL supports the majority of the measures although the details of how these are incorporated into the Section 106 agreement will need to be the subject of ongoing discussion between the applicants, boroughs and TfL.

83 Provision of a travel information centre will help to provide a physical presence on site and act as a focus for the various Green Travel Plan initiatives. Similarly the appointment of a Transport Manager will help to ensure that there is an ongoing commitment from residents and commercial occupiers.

84 Although TfL supports the concept of requiring residents to pay for public transport through the annual service charge, the proposed amount would be insufficient to purchase an annual Travelcard. References to a public transport smart card in the Transport Assessment could be misleading and in subsequent documents TfL is pleased to see this has been amended. Although the details have not been fully worked out, TfL urges the applicants to consider requiring purchase of an annual Travelcard for zones 1 and 2 as an alternative.

85 A car share pool and discounts on car hire facilities are proposed. TfL would like to see the concept of a car share pool developed further including the allocation of parking spaces within the site for pool cars. Membership of the scheme should enable residents to obtain discounts on car hire facilities. It will be important that the on-site facility forms part of the wider network being developed by a number of London boroughs including Kensington & Chelsea with support from TfL.

River transport

86 Improved access to Chelsea Harbour pier and better passenger facilities are proposed as part of the transport package. Although the pier is privately owned these improvements are supported by London River Services. A compulsory subsidy of £100 per private residential unit per annum is proposed to support improved river services. This would amount to a total subsidy of approximately £50,000 per year to be guaranteed in perpetuity. It is understood that in return for the subsidy an operator has expressed interest in providing an additional river bus service between Chelsea Harbour and Westminster Pier during the morning and evening peak hours to complement the existing service to Cadogan and Embankment Piers.

87 The operator of the existing service had previously indicated that the frequency and capacity could be increased in line with demand although it is not certain whether this would still proceed given the introduction of the new subsidised service. London River Services would not be directly involved in service provision although Travelcard holders could obtain a one-third discount on the new service.

Taxi services

88 The Green Travel Plan refers to measures to encourage use of local taxi and minicab services. It is important that these include licensed hackney carriages, which are fully accessible. Although it is not referred to in the Transport Assessment, TfL understands that space within the development adjacent to the creek will be reserved for a taxi rank.

Parking

89 Although TfL welcomes the reduction in parking from the earlier application, the amount of parking for the private units is still generous. A total of 696 spaces are proposed. These include 40 public parking spaces relocated from Lots Road. Although overall provision is below 1 space per unit, this has only been achieved because very few spaces are being provided to serve the affordable units. 582 spaces are provided in connection with 498 private units while only 74 spaces are provided for 368 affordable units. TfL would want to see the number of spaces provided in connection with the private units reduced to a maximum of 1 space per unit. The package of measures proposed in the SITS, including plans for a car pool facility, should enable overall levels of parking to be reduced.

90 The management of on-site parking to minimise transport impacts will be an important consideration. TfL is concerned that residents on site A (in Kensington & Chelsea) would be able to apply for residents' on street parking permits. This could undermine attempts to control parking and Kensington & Chelsea Council is urged to amend current regulations to ensure that residents of the Lots Road development are not eligible to apply for on street permits. This would help to address local residents' concerns about traffic generation and parking pressure on local roads.

91 TfL considers that an annual charge for each space may be more effective than outright sale with the property. If demand proved lower than expected the surplus spaces should be converted into more profitable uses. The approach to parking management will need to form part of the Green Travel Plan.

TfL's conclusion

92 TfL welcomes the package of transport improvements in the SITS which appear to represent a genuine attempt to encourage the alternatives to car travel. Further work will be needed to agree the detailed schemes that will form part of the Section 106 agreement. This should involve the applicants, boroughs and TfL.

93 The Section 106 agreement will need to provide flexibility (to allow funding to be reallocated if necessary) and certainty that the list of transport projects can be delivered. Some costs are likely to rise during the planning and development process and additional funding will need to be provided to cover these cost increases.

94 The impact of the development on the strategic road network has been assessed and is considered to be acceptable.

95 Overall parking provision is lower than the earlier application but the number of spaces allocated for the private residential units is still considered to be generous and should be reduced to a maximum of 1 space per unit. The approach to parking management should form part of the Green Travel Plan.

Other comments

96 English Heritage supports both the original scheme and this scheme. English Heritage conclude that the two towers will have little or no adverse impact on listed buildings, conservation areas or other heritage designations.

97 CABI supports the original scheme and was involved in negotiations with the architect to secure improvements to the design of the two towers. CABI continues to offer its strong support for the scheme and welcomes the reuse of brownfield land, the power station and the provision of much needed high density housing in central London. CABI considers that *"the project constitutes a residential scheme of the highest quality, and is arguably the best such scheme along this part of the river for 20 years"*.

98 The Environment Agency object to the proposals on a number of grounds including encroachment onto Chelsea Creek, impact on flood defences, the details of the proposed works to the creek, the lack of a creekside/riverside space and the positioning of the towers play in denying the creation of such space, the narrowness of the Thames Path and its enclosed and unwelcoming feeling.

99 The Lots Road Action Group does not object in principle to the development of the site but does object to such a high density development in the absence of adequate public transport infrastructure to support the development.

100 The Chelsea Harbour Residents' Association object to the scale, height, massing and density of the proposals and the adverse effects that they would have on the locality.

101 The Chelsea Society welcomes some of the changes to the scheme but continue to object to the density at 961 hr/ha, inadequate public transport improvements, the towers, the quality of the spaces on the river and safeguarding of the creek as a "Little Venice".

102 Hammersmith and Fulham Historic Buildings Group object to the height, scale and density of the proposed development.

Legal considerations

103 There are no legal considerations at this stage.

Financial considerations

104 There are no financial considerations at this stage.

Equal opportunities considerations

105 The two Councils have policies, which seek to secure a percentage of residential accommodation to be suitable for occupation by wheelchair users (10%). Access around the site is generally step free. The applicants should be asked to provide a complete access statement.

Conclusion

106 The site is one of a few large opportunity sites within central London, which could deliver a significant contribution to the draft London Plan's housing targets. Although the site has relatively poor public transport accessibility at the moment, improvements could be achieved in the short term through enhanced bus services and in the long term through improvements to the West London line and "Orbi-Rail". The developer would be expected to make a significant financial contribution to these projects through S.106 contributions. Consideration should also be given to further reducing on-site car parking.

107 Given the proposed improvements to public transport, the density of development proposed for the site is considered to meet the guidelines set out in the draft London Plan. The density of development proposed also allows for the delivery of a significant level of affordable and private housing on the site. The design of the scheme is considered to be of a high quality with the towers contributing positively to the London skyline and the setting of the Thames and the Lots Road Power Station. It is regrettable that one of the towers has been reduced in height and the opportunity for a taller, elegant tower foregone. The accessibility into and through the site and the creek is considered to be a significant urban design gain. The legibility and permeability of the scheme could be enhanced by some amendments to the layout but overall the design quality is of the highest quality.

108 The increased levels of affordable housing provide on the site are closer to meeting the requirements of the draft London Plan, although additional viability information would be required in order to fully assess the high cost of decontaminating the site and decommissioning the power station. Overall, the development is considered to be in the interest of good strategic planning in London.

for further information, contact Planning Decisions Unit:

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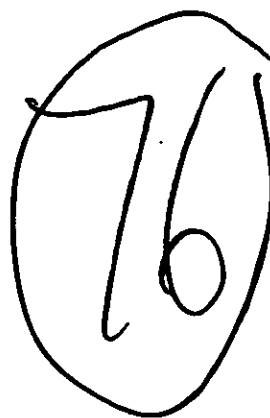
Colin Wilson, Case Officer

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GREATER **LONDON** AUTHORITY
Policy & Partnerships Directorate

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Environment Department
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Our ref: PDU/0066CW06
Your ref: 2002/1366/1368p
Date: 30 August 2002

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.		- 5 SEP 2002			PLANNING	
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		ARB	FPLN	DES	FEES	

Dear Mr. Entwistle,

**Town & Country Planning Act 1990 (as amended); Greater London Authority
Act 1999; Town & Country Planning (Mayor of London) Order 2000
Lots Road**

I refer to your letter of 25 June 2002 consulting the Mayor of London on the above planning application. On 28 August 2002 the Mayor considered a report on this proposal, reference PDU/0066/02. A copy of the report is attached, in full.

Having considered the report, the Mayor's conclusions are as follows.

- The site is one of a few large opportunity sites within central London that could deliver a significant contribution to the draft London Plan's housing targets. Although the site has relatively poor public transport accessibility at the moment, improvements could be achieved in the short term through enhanced bus services and in the long term through improvements to the West London line and "Orbi-Rail". The developer would be expected to make a significant financial contribution to these projects through S.106 contributions in order to mitigate the movement impacts on the surrounding area. Consideration should also be given to further reducing on-site car parking.
- Given the proposed improvements to public transport, the density of development proposed for the site is considered to meet the guidelines set out in the draft London Plan. The density of development proposed also allows for the delivery of a significant level of affordable and private housing on the site. The design of the scheme is considered to be of a high quality with the towers contributing positively to the London skyline and the setting of the River Thames and the Lots Road Power Station. The accessibility into and through the site and the creek is considered to be a significant urban design gain. The legibility and permeability of the scheme could be enhanced by some amendments to the block layout and in particular views into and through the site, but overall the design is of a high quality.



- The increased levels of affordable housing provided on the site (at 50% on the Hammersmith & Fulham side) meet the target set out in the draft London Plan.

Overall, the Mayor considers that the development is in the interest of good strategic planning in London.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The Mayor has taken the environmental information made available to date into consideration in formulating his comments.

If Hammersmith & Fulham Council decides in due course that it is minded to approve the application, it should allow the Mayor fourteen days to decide whether or not to direct the Council to refuse planning permission (under article 4(1)(b)(i) of the Town & Country Planning (Mayor of London) Order 2000). You should therefore send me a copy of any officer's report on this case to your planning committee (or its equivalent), together with a statement of the permission your authority proposes to grant and of any conditions the authority proposes to impose, and a copy of any representations made in respect of the application (article 4(1)(a) of the Order).

Yours sincerely,

Giles Dolphin

Planning Decisions Manager

cc Angie Bray, London Assembly Constituency Member
 Bob Neill, Chair of London Assembly Planning and Spatial Development Committee
 Kensington & Chelsea Council
 Andrew Melville, GoL
 Sam Richards, TfL
 Anne Crane, LDA
 Jim Pool, Montagu Evans

- ☐ City of London
- ☐ Glasgow
- ☐ Edinburgh



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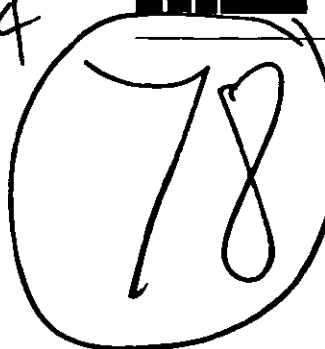
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30 August 2002

Royal Borough of Kensington & Chelsea
Planning Department
Town Hall
Hornton Street
London W8 7NX

FAO: John Thorne Esq

PP/02/1324



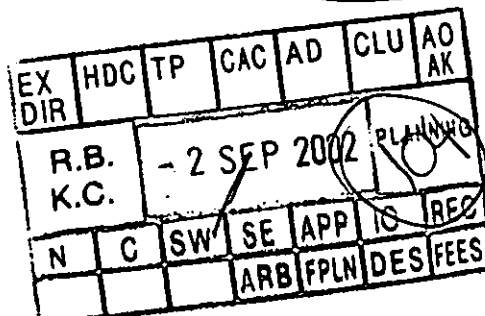
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Dear Sirs

LOTS ROAD POWER STATION DEVELOPMENT - AMENDMENT TO PLANNING APPLICATIONS

PLANNING APPLICATION REFERENCES: 02/01324 & 02/01325 (duplicate)

As you are aware, we are currently in the process of discussing the contents of the current planning application with your officers. A similar process is taking place on the remainder of the site within the London Borough of Hammersmith and Fulham. As a consequence of discussions with the Environment Agency and the London Borough of Hammersmith and Fulham, a number of amendments are proposed to the make up of the Creek and residential content to the south of the Creek (Hammersmith and Fulham). As the borough boundary runs down the middle of Chelsea Creek, it is necessary to amend the contents of the application previously submitted to your Borough. We hereby enclose 15 copies (10 x A3 and 5 x A0) of the amended plans for your approval. The attached drawing schedule lists the drawings containing amendments within the Royal Borough.

In view of the nature of the proposed amendments, an addendum to the existing Environmental Statement has been prepared. The addendum document assesses the environmental impact of the changes and concludes that the amendments will not affect the original conclusions set out in the Environmental Statement: the residual environmental impact of the revised scheme remains substantially beneficial. As discussed, we enclose 6 copies of this addendum for your attention.

As this is an amendment to an existing Environmental Statement, our clients have placed the requisite Notices on site, 7 days prior to the submission of this amendment (copy enclosed) and adverts will be placed in the Kensington Informer on the 6 September 2002. We have notified all statutory consultees in writing as well as series of key non-statutory consultees who have previously expressed an interest in the application. We enclose copies of the letters submitted to these parties identifying the requirement for them to respond to the Royal Borough within 21 days of the service of the Notices.

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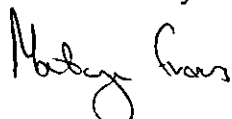
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S M Wilson

Finally, in pursuance of Regulation 14 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999, press notices have been published in the Kensington Informer, which is due to be published on the 6 September 2002, and we certify that a notice has been left on site for not less than seven days in the 28 days immediately preceding the date of submission.

If you would like to discuss any aspects of these submissions in more detail please feel free to contact Jim Pool of this office.

Yours faithfully



MONTAGU EVANS

Enc.

Cc: Paul Entwistle – London Borough of Hammersmith and Fulham



JWP/jb/PD5824

30 August 2002

City of Westminster
Development Planning Services
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PP / 02/1324



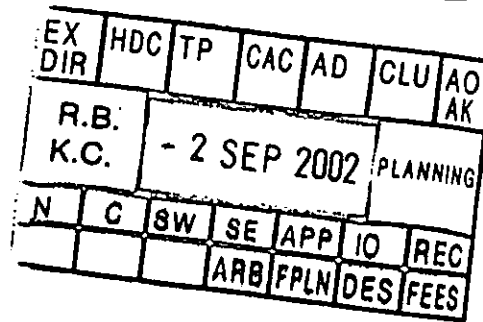
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Dear Sirs

LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE

PLANNING APPLICATION REFERENCES:

LONDON BOROUGH OF HAMMERSMITH AND FULHAM: 2002/1366/P & 2002/1368/P (duplicate)

ROYAL BOROUGH OF KENSINGTON AND CHELSEA: 02/01324 & 01/01325 (duplicate)

As you aware, we have submitted applications in duplicates to the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea for the primarily residential development of the above site.

Following discussions with the London Borough of Hammersmith and Fulham, the Environment Agency and a series of other interested parties, our client has decided to amend the current planning applications. The amendments to the built component of the development fall solely within the London Borough of Hammersmith and Fulham, however, as there are also changes proposed to the configuration of the Creek (which the borough boundary runs up the middle of) amendments also have to be made to the current planning applications within the Royal Borough of Kensington and Chelsea.

In view of the nature of the proposed amendments, an addendum to the existing Environmental Statement has been prepared. The addendum document (copy enclosed) assesses the environmental impact of the changes and concludes that the amendments will not affect the original conclusions set out in the Environmental Statement: the residual environmental impact of the revised scheme remains substantially beneficial. Also included is a set of the amended drawings at size A3.

The proposed amendments incorporate the following:

- Reduction in the number of residential units within the London Borough of Hammersmith and Fulham from 443 to 398 (a reduction of 45 units).
- The total number of private units has been reduced from 221 to 199 and the total number of affordable housing units has been reduced from 222 to 199, thereby maintaining the 50:50 ratio of

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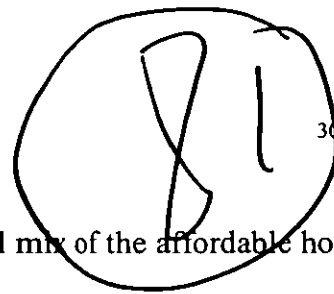
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30 August 2002
Page 2

the number of private to affordable housing units. The residential mix of the affordable housing has also been altered.

- A gated pathway has been introduced between the garden fences of Block HF5 and Admiral Square in order to allow Chelsea Harbour Limited service access. This pathway will be gated and secured.
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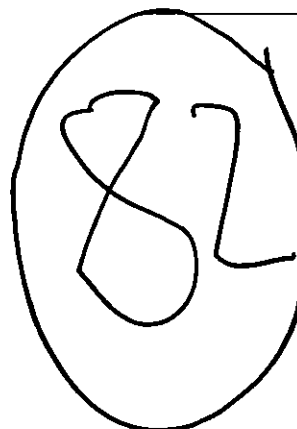
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JWP/jb/PD5824

30 August 2002

London Borough of Wandsworth
 Planning Department Town Hall
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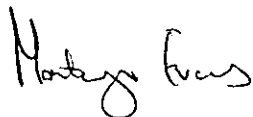
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30 August 2002

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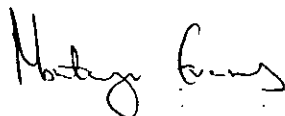
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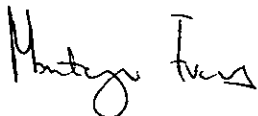
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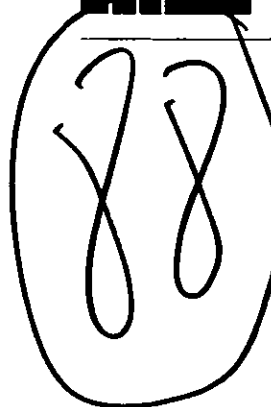
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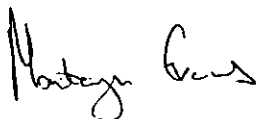
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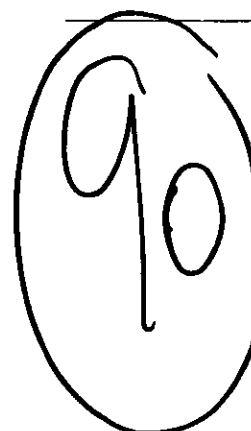
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Dr Rory O'Donnell, English Heritage
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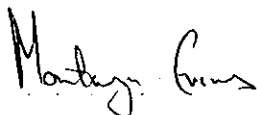
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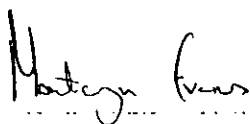
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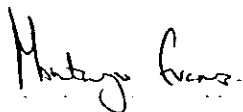
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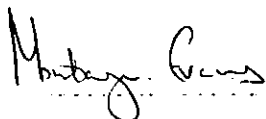
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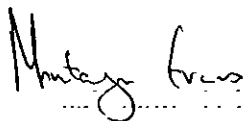
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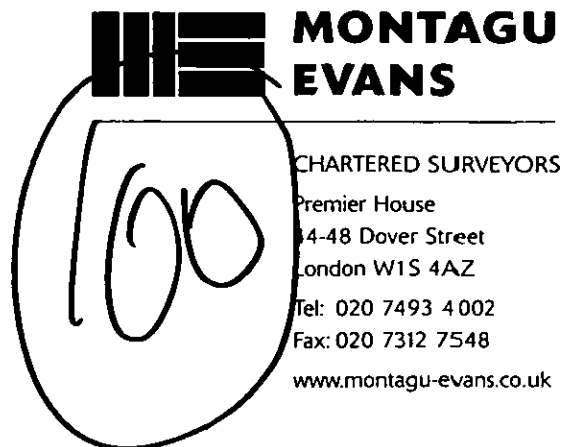
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Apollo House
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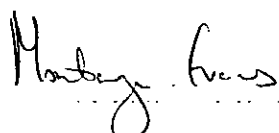
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JWP/jb/PD5824

30 August 2002

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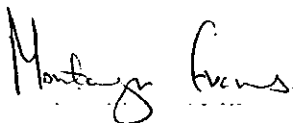
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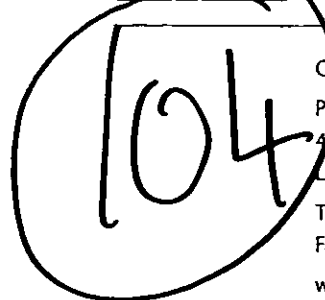


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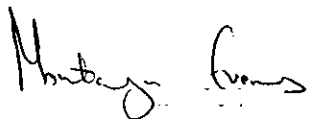
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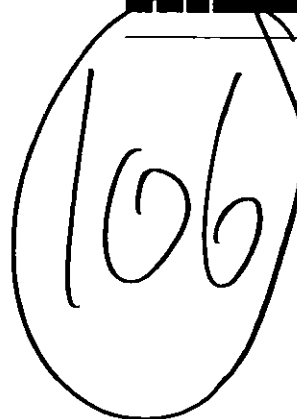
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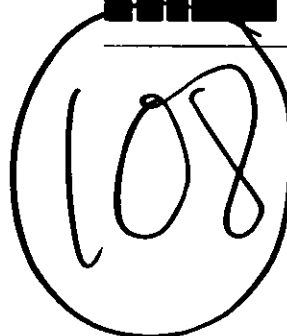
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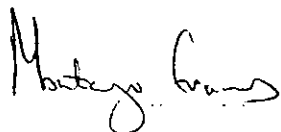
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