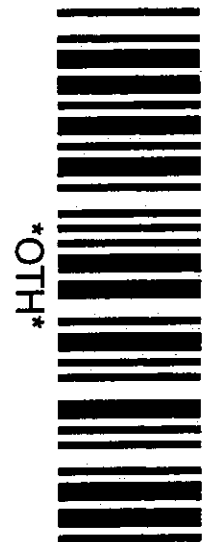


**ROYAL BOROUGH  
OF  
KENSINGTON & CHELSEA**

**DOCUMENT SEPARATOR**

**DOCUMENT TYPE:**

**OTHER**



**\*OTH\***

☐ City of London  
☐ Glasgow  
☐ Edinburgh



**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

The Environment Agency  
Apollo House  
2 Bishops Square Business Park  
Hatford  
AL10 9EX



CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:  
020 7312 7548  
E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Phillpotts  
P J Mason  
M A C Higgins

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott  
J N Stephenson

**ASSOCIATES**

T J Masterman  
Sarah Donovan  
J Askham  
L Ewan  
P J Wise  
A Kearley  
I D Macleod  
Diane Rider  
P A Dempsey  
J Drew

A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman  
Christine Blair

**CONSULTANTS**

D H Taylor  
N J R Braybrook  
R F Durman  
I P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skekey

**SECRETARY**

S M Wilson

p:\amal\pd5824 lots road\dec02\lrc\pd001202.doc

- ☐ City of London
- ☐ Glasgow
- ☐ Edinburgh



**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Tanya Bailey, Transport for London  
10th Floor Windsor House  
42-50 Victoria Street  
London  
SW1H 0TL



CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Muchie  
R V Bower  
D A McCrory  
R M Philpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Davey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munns  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hemmiston  
J C Pagella  
G M Skeicey

**SECRETARY**  
S M Wilson

p:\arna\pd5824 lots road\dec02\lotsroad091202.doc

☐ City of London  
☐ Glasgow  
☐ Edinburgh



**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Peter Stewart, Commission for Architecture  
& Built Environment  
The Tower Building  
11 York Road  
London  
SE1 7NX

CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:  
020 7312 7548  
E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Phillips  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skekey

**SECRETARY**  
S M Wilson

- ☐ City of London
- ☐ Glasgow
- ☐ Edinburgh



AMA/jb/PD.5824

18 December 2002

Hanna Elliot, Greater London Authority  
Planning Decisions Unit  
Romney House  
London  
SW1P 3PY



CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

# **LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR DRIVE, LONDON, SW10**

## **Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

### **PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Philpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaris  
I S Clark  
G H J McConigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
S M McDonald  
A D Munnis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

City of London  
Glasgow  
Edinburgh



**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Highways Agency  
Correspondence Unit, Room 13/14  
St Christopher House  
London  
SE1 0TE

CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@

montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbottom  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Philpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearey  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunniffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

- ☐ City of London
- ☐ Glasgow
- ☐ Edinburgh

AMA/jb/PD.5824

18 December 2002

Bill Woodward, Licensing Officer, Port of  
London Authority  
London River House,  
Royal Pier Road,  
Kent  
DA12 2BG

**MONTAGU  
EVANS**

CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@

montagu-evans.co.uk

Dear Sirs

# **LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR DRIVE, LONDON, SW10**

## **Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

### **PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Phillpotts  
P J Mason  
M A C Higin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Estex  
M E Kuit  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lizbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cuntiffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

- ☐ City of London
- ☐ Glasgow
- ☐ Edinburgh

AMA/jb/PD.5824

18 December 2002

Glenn Duggan CPDA  
Chelsea Police Station  
2 Lucan Place  
London  
SW3 3PB



**MONTAGU  
EVANS**

CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@

montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
R V Bower  
D A McCrory  
R M Philpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudat  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelekey

**SECRETARY**  
S M Wilson

City of London  
Glasgow  
Edinburgh

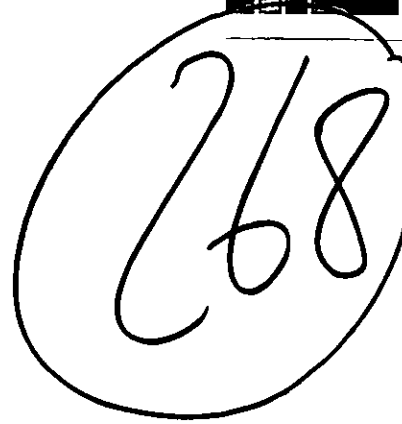


**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Ian Halden CPDA  
Fulham Police Station  
Heckfield Place,



CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:  
020 7312 7548  
E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Phillpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudatius  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearey  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

p:\ama\pd5824 lots road\dec02\lotsroad091202.doc

- ☐ City of London
- ☐ Glasgow
- ☐ Edinburgh

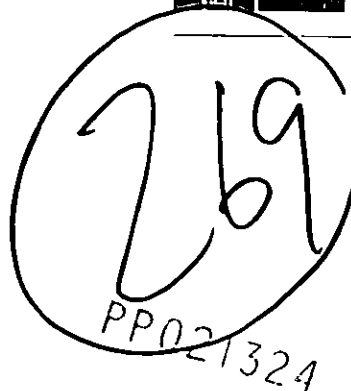


**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Legal Secretariat  
Network Rail  
Railtrack Headquarters  
Euston Square  
London  
NW1 2EE



CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:  
020 7312 7548  
E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Ken  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowne

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
R V Bower  
D A McCrory  
R M Phillpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Clare Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munns  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

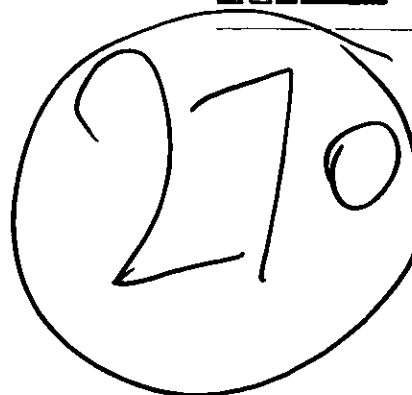
City of London  
Glasgow  
Edinburgh

**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

The Westminster Society  
c/o Peter Handley  
41 The Gardens  
London  
SE22 9QG



CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ  
Tel: 020 7493 4002  
Fax: 020 7312 7548  
www.montagu-evans.co.uk

Return Fax number:  
020 7312 7548  
E-mail: archie.avery@  
montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

p:\ama\pd5824 lots road\dec02\lotsroad091202.doc

**PARTNERS**

R G Thomas  
W C O'Hare  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbottom  
P T H Lowe

K J Mitchell  
R P Posner  
P B Grant  
H A Ruthertord  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
R V Bower  
D A McCrory  
R M Phillpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaius  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearey  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

- City of London
- Glasgow
- Edinburgh

AMA/jb/PD.5824

18 December 2002

Civil Aviation Authority  
Aerodrome Safeguard, Aerodrome Standards  
Department  
Aviation House  
West Sussex  
RH6 0YR



**MONTAGU  
EVANS**

CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@

montagu-evans.co.uk

PP021324 / B

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Keni  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Ruthertford  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohn

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
O A McCrory  
R M Philpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cuntiffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skekey

**SECRETARY**  
S M Wilson

p:\ama\pd5824 lots road\dec02\lotsroad091202.doc

- City of London
- Glasgow
- Edinburgh

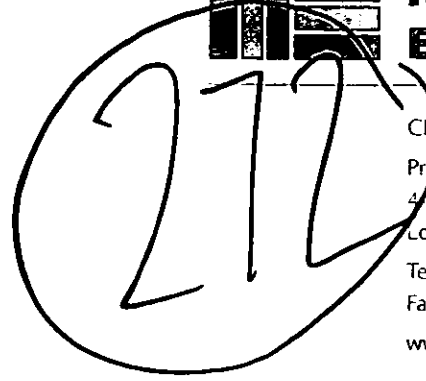


**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Government Office for London  
Planning Department  
9th Floor Riverwalk House  
London  
SW1P 4RR



CHARTERED SURVEYORS

Premier House  
47-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@

montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Pusner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Philpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudatis  
I S Clark  
G H J McGonigal

Clare Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masterman  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hemmiston  
J C Pagella  
G M Stelacey

**SECRETARY**  
S M Wilson

City of London  
Glasgow  
Edinburgh



**MONTAGU  
EVANS**

AMA/jb/PD.5824

18 December 2002

Corporate Affairs Team  
Hammersmith & Fulham Primary Care Trust  
5/7 Parsons Green  
SW6 4UL  
FAO: Peter Osborne Esq

CHARTERED SURVEYORS

Premier House  
44-48 Dover Street  
London W1S 4AZ

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

Return Fax number:

020 7312 7548

E-mail: archie.avery@

montagu-evans.co.uk

Dear Sirs

**LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, CHELSEA HARBOUR  
DRIVE, LONDON, SW10**

**Town and Country Planning (Environmental Impact Assessment) (England and Wales)  
Regulations 1999**

Circadian Ltd, are submitting a planning application to the London Borough of Hammersmith and Fulham to redevelop the above site for residential accommodation.

Circadian Ltd are also amending the current application in the Royal Borough of Kensington and Chelsea for a predominantly residential mixed use development. One Environmental Statement has been produced that considers the impact of the development for the whole site.

Within the Royal Borough of Kensington & Chelsea the principal amendments are as follows:

- The height of block KC1 has been reduced from 30 to 25 storeys.
- The provision of affordable housing units has increased from 146 to 166 units. This equates to 40% of the total number of units being affordable.
- A reduction in the number of private units from 276 to 254 units.
- A number of design changes are proposed to blocks KC1, KC2 and KC4.
- Alterations to the configuration of the proposed public open space.

With regards to the London Borough of Hammersmith & Fulham, the new planning application incorporates a series of changes to the previous scheme including:

**PARTNERS**

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cobu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Phillpotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott

**ASSOCIATES**  
T J Masternan  
Sarah Donovan  
P K Young  
J Askham  
L Ewan  
P J Wise  
A Kearey  
I D MacLeod  
Diane Rider

P A Dempsey  
J Drew  
A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munis  
Sarah Yeoman

**CONSULTANTS**  
D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelcey

**SECRETARY**  
S M Wilson

p:\amatpd5824 lots road\dec02\lotsroad091202.doc

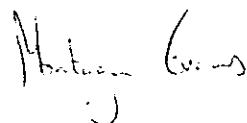
- A reduction in the number of private units from 222 to 181. An increase in the percentage level of affordable housing from 50% to 54%.
- An increase in height of block HF1 from 25 storeys to 37 storeys.
- The reduction in height of blocks HF2, HF3((c) – formally HF7), HF4 and HF5 by 1 storey.
- The removal of the detached unit (formally HF6) from the scheme.
- Studios to the rear of Block HF5 have been removed.
- One row of Horse Chestnut trees subject to Tree Preservation Orders to the rear of block HF5 are to be removed.
- The creek regeneration scheme has been subject to a number of design alterations further to previous comments made by the Environment Agency.

We enclose a copy of the application forms submitted to the London Borough of Hammersmith & Fulham, a copy of the covering letter accompanying the amendments submitted to the Royal Borough of Kensington, a set of drawings and a copy of the Environmental Statement.

If you would like to make any representations in respect of these amendments please write to Paul Entwistle at the London Borough of Hammersmith & Fulham, Department of Planning, The Town Hall Extension, King Street, London W6 9JU and John Thorne at the Royal Borough of Kensington & Chelsea, planning department, Town Hall, Hornton Street, London W8 7NX, 21 days from the receipt of this notice.

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

Yours faithfully



**MONTAGU EVANS**

c.c.	John Thorne	-	Royal Borough of Kensington & Chelsea
	Paul Entwistle	-	Royal Borough of Hammersmith & Fulham

ENVIRONMENT DEPARTMENT  
DEVELOPMENT CONTROL  
2<sup>nd</sup> January 2003

Planning & Conservation  
Royal Borough Of Kensington And  
Chelsea  
The Town Hall  
Hornton Street  
London  
W8 7NX

**Hammersmith  
& Fulham**

*Serving our Community*

**LONDON BOROUGH OF  
HAMMERSMITH & FULHAM**

Town Hall, King Street  
Hammersmith, London W6 9JU

WEB [www.lbhf.gov.uk](http://www.lbhf.gov.uk)

TEL 020 8753 1084

FAX 020 8753 3485

Please ask for

**Mr Paul Entwistle**

Extension: 3472

Fax: 020 8753 4870

Application Number **2002/03132/FUL**

Dear Sir / Madam,

### **TOWN AND COUNTRY PLANNING ACT 1990**

Address: **Land Adjacent To South Side Of Chelsea Creek,, Chelsea Harbour  
Drive, Chelsea Harbour London**

Proposal: **Demolition of buildings ancillary to the Lots Road Power Station  
and redevelopment of all unbuilt land to provide 397 units of  
residential accommodation (comprising 100 one bedroom units,  
168 two bedroom units, 106 three bedroom units and 23 four  
bedroom units) together with 267 car parking spaces, a  
gymnasium (823 sq.m) and associated works to Chelsea Creek  
and Chelsea Basin, including the construction of three bridges  
over the creek.**

Application Type: **Full Detailed Planning Application**

I refer to details of a planning application, which has been sent to you by the applicant's  
(Circadian Ltd) agent, Montagu Evans.

This planning application is the third submission for the proposed redevelopment of this site.  
Previous applications for a greater number of dwellings were refused in April 2002 (464  
dwellings) and September 2002 (443 dwellings).

The application is part of a larger proposal for the redevelopment of the entire power station  
site, incorporating the conversion of the existing power station building. The same developer  
is seeking planning permission from the Royal Borough of Kensington and Chelsea for the  
adjacent Power Station in Lots Road (land adjacent to the north side of Chelsea Creek).

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.		- 6 JAN 2003			PLANNING	
N	C	SW	SE	APP	IO	REG
		ARB		PLN	DES	FEES

The application is accompanied by an Environmental Statement, which covers the development site with both Boroughs.

The proposed development in this Borough does not accord with the provisions of the adopted Unitary Development Plan 1994.

The proposed development in this Borough may affect the character or appearance of a conservation area.

I shall be pleased to receive any observations you may wish to submit on this application by 31<sup>st</sup> January 2003. Please address all your correspondence to Mr Paul Entwistle, Development Control Division, Environment Department, London Borough of Hammersmith and Fulham, Town Hall, King Street, London W6 9JU.

Yours faithfully  
Stephen Moralee  
Head of Development Control

# ENVIRONMENTAL SERVICES

THE TOWN HALL HORNTON STREET LONDON W8 7NX

Executive Director MICHAEL STROUD BSc DipTE CEng FICE FIHT FIMgt

Director of Transportation and Highways CRAIG WILSON BSc MSc CEng MICE FIHT

Richard Carr  
Transport for London  
Windsor House  
42-50 Victoria Street  
London  
SW1H 0TL

Direct Line: 020 7361 3747  
Facsimile: 020 7361 2796  
Email: richard.case@rbkc.gov.uk  
Web: www.rbkc.gov.uk

277

08 January 2003

My reference: Lots Road

Your reference:

Please ask for: Richard Case

Dear Richard

## LOTS ROAD PLANNING APPLICATION

At the last meeting we had with Symmonds you agreed to provide me with some further information regarding the rail and bus proposals associated with the development.

In particular I requested clarification of how an 8 car station at Chelsea Harbour will speed up the introduction of Orbirail and associated improvements to the WLL as opposed to the existing proposals being developed by Imperial Wharf, Hammersmith and Fulham and the Royal Borough.

In addition I requested that with London Buses you considered what local bus services would be required given a station at Chelsea Harbour. In particular improved north-south services and links to existing routes.

I understand that Symonds are organising a meeting for the week commencing 20<sup>th</sup> January and I would appreciate this information in advance of the meeting

Yours sincerely

Richard Case  
Principal Engineer- Transportation and Road Safety

---

**PLANNING AND CONSERVATION**

THE TOWN HALL HORNTON STREET LONDON W8 7NX

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS

---

File Copy

Switchboard: 020-7937-5464

Direct Line: 020-7361-2467

Extension: 2467

Facsimile: 020-7361-3463

**THE ROYAL  
BOROUGH OF**



**KENSINGTON  
AND CHELSEA**

---

Date: 09 January 2003

My Ref: DPS/DCSW/PP/02/01324 & 1325/JT Please ask for: J. Thorne

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990**

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT  
ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 1999**

**Proposed development at:**

**Lots Road Power Station and Chelsea Creek, London, SW10**

Please treat this letter as formal consultation in respect of revisions to the above planning application, recently received by this Council, which includes an Environmental Statement.

Due to the considerable number of plans and supporting documentation, the agent (Montagu Evans), acting for the applicant (Circadian) has agreed to send the details of the application direct to you. I understand this has been done with a covering letter dated 18th December 2002.

I should be pleased to receive your observations on these proposals as soon as possible. It is particularly important for those identified in paragraph 98 of Circular 2/99 (Environmental Impact Assessment) as "the consultees" to respond within one month of the above date or as soon thereafter as practicable. If you have not received the application details from the applicant or if you require any further details in respect of this case please contact the Case Officer on the above telephone number.

Yours faithfully

**M.J. FRENCH**

Executive Director, Planning and Conservation

- City of London
- Glasgow
- Edinburgh

JWP/jb/PD5824

13 January 2003

The Executive Director  
Planning & Conservation  
Royal Borough of Kensington & Chelsea  
Town Hall, Hornton Street  
London W8 7NX

FAO: John W Thorne Esq

Dear Sir

## LOTS ROAD POWER STATION, SW10

As you are aware, we have now submitted an amendment to the current planning applications for this site with a new Environmental Statement. We set out below a series of answers to the points originally raised in your letter of 19 September 2002. The answers specifically relate to the amended planning application scheme. We also attach a matrix which directs you towards the specific areas within the Environmental Statement where the necessary material can be sourced.

### Matters for Revisions

#### 1. Affordable Housing

The amended proposals incorporates 40% affordable housing, the residential mix of which will be as follows.

Type	No.	%
Studios	23	14%
1 bed	35	21%
2 bed	58	35%
3 bed	33	20%
4 bed	17	10%
<b>Total</b>	<b>166</b>	<b>100%</b>

As you are aware, we are also incorporating affordable housing within the Hammersmith and Fulham element of the development. The total residential mix between both Boroughs will be as follows.

Type	No.	%
Studios	23	6%
1 bed	104	27%
2 bed	145	38%
3 bed	79	21%
4 bed	31	8%
<b>Total</b>	<b>382</b>	<b>100%</b>

#### PARTNERS

R G Thomas  
W C O'Hara  
C A Riding  
M J Kerr  
S L Thomas  
T P Watkins  
S R W Harris  
J T Bailey  
A C W Rowbotham  
P T H Lowrie

K J Mitchell  
R P Posner  
P B Grant  
H A Rutherford  
C M M Whyte  
A J Simmonds  
N P How  
R D Harvey  
D A M Reid  
R J Cohu

R P Woodman  
S J Waugh  
G S Davey  
A R McRitchie  
I J Michie  
R V Bower  
D A McCrory  
R M Philippotts  
P J Mason  
M A C Higgin

S E Knight  
G Howes  
N P Law  
T J Raban  
M J Knight  
G C Essex  
M E Kut  
M Gudaitis  
I S Clark  
G H J McGonigal

Claire Treanor  
J G Anderson  
T J Earl  
R A Clarke  
D W Graham  
P E Henry  
B J Collins  
M R P Gibbs  
H W Morgan  
J W Pool

S J Fricker  
A P Richardson  
Louise Younger  
R Sewell  
M J Whitfield  
Lisbeth Dovey  
N D Dryburgh  
W A Scott  
J N Stephenson

#### ASSOCIATES

T J Masterman  
Sarah Donovan  
J Askham  
L Ewan  
P J Wise  
A Kearney  
I D MacLeod  
Diane Rider  
P A Dempsey  
J Drew

A H Wood  
N P Goodman  
S M Cunliffe  
Joanna Fone  
Rachel Gee  
S M McDonald  
A D Munnis  
Sarah Yeoman  
Christine Blair

#### CONSULTANTS

D H Taylor  
N J R Braybrook  
R F Durman  
J P A Forsyth  
J B Hermiston  
J C Pagella  
G M Skelecy

#### SECRETARY

S M Wilson

p:\jwp\2003\pd5824\assessing\jthornrblc1001.doc

Handwritten: 279

EX DIR	HDC	TP	CAC	AD	CLU	AO
R.B. K.C.		15 JAN 2003		LAWYER		
N	C	SW	SE	DM	REC	
		ARB		FP	IN	FEES

2. ***Chelsea Creek***

Since your receipt of comments from the Environment Agency we have been in detailed discussions with them in order to alleviate their concerns. We feel that through amendments to the Creek, now formally submitted to your office, their objections should be satisfied. (see matrix)

Waterman Environmental also wrote to your office on 23 October to address the continued use of the Creek for watersports uses.

3. ***Design Matters***

Our client has reduced the height of the Kensington and Chelsea Tower to 25 storeys.

With regard to your comments regarding the square fronting the Power Station, further work has been undertaken to address your concerns regarding the "sense of enclosure". This has been included within the amended submission. You will note that CABE state in their letter of 13 December 2002 that "the changes to the site layout have in our view resulted in a successful sequence of open spaces each with a distinct character."

4. ***Car Parking***

The proposal will meet your car parking standards.

**Matters for Additional Submission**

5. ***Air Quality***

We refer you to our letter to Amanda Hughes of your Borough dated 10 October 2002. The amended Environmental Statement seeks also to addresses these matters (see matrix).

6. ***Archaeological Investigation***

We have subsequently met with English Heritage to agree an appropriate way forward. Additional documentation has been prepared which is incorporated within the amended Environmental Statement (see matrix).

7. ***Colour Drawings***

These drawings are being prepared, however, due to the long lead in time they do not form part of the amendment to the planning application.

8. ***Commercial Units***

Our clients have undertaken to provide you with large scale sections of the proposed light industrial units. These do not form part of the amended planning proposals, but will follow in due course.



9. ***Community Facilities***

Details of this are provided in the new ES and the basement, ground and first floor plan (see matrix).

10. ***Construction Materials***

Reference to the maximum possible use of recycled and sustainable construction materials is within the amended Environmental Statement (see matrix).

11. ***Construction Traffic***

Reference to the traffic generated by construction is within the Environmental Statement (see matrix).

12. ***Environmental Management Plan***

The EMP is appended to the Environmental Statement (see matrix).

13. ***Green Roofing***

The Environmental Statement incorporates clear references to the extent of green roofing. We envisage that details concerning plant types will be dealt with by a planning condition (see matrix).

14. ***Land Contamination***

We note the points raised within this paragraph of your letter. A full remediation strategy and risk assessment was submitted on 5 November and is incorporated within the Environmental Statement (see matrix).

15. ***Landscaping and Surface Access***

Landscaping plans for the public areas are incorporated within the amended plans. We are also preparing a separate plan reflecting our vehicular access strategy.

16. ***Lighting***

We have provided information on the lighting strategy for the construction period in the Environmental Statement. We anticipate other lighting matters being dealt with by planning condition (see matrix).

17. ***Neighbourhood Shop***

Details of the size and proposed location of the neighbourhood shop are incorporated within the amended application (see ground floor plan).

18. ***Phasing***

See figures 6.2 – 6.7 on page 47 of the Environmental Statement.

282

19 ***RSL***

We can confirm that our clients will work with an RSL partner selected in conjunction with the Royal Borough in its capacity as the housing authority.

20. ***Renewable Energy***

As we have discussed, our clients have concerns with regard to effectiveness and efficiency of incorporating photo voltaic panels within their development. This is based upon their own experience at Greenwich Millennium Village. See matrix for references to renewable forms of energy.

21. ***Thames Path***

Our clients are happy for matters associated with the detailed design of the Thames Path to be incorporated within any subsequent Section 106 Agreement.

With regard to a potential new Thames pedestrian cycle/river crossing, our clients are not prepared to accept a requirement to land any future new Thames Crossing on their site.

22. ***Security and Crime Prevention***

Our clients have met with the local police representative and his requirements are incorporated within the amended application and the Environmental Statement (see matrix).

23 ***Sunlighting and Daylighting***

Information on sunlighting and daylighting has been prepared by our consultant and is incorporated within the Environmental Statement (see matrix).

24 ***BSP Transformer***

I refer to the letter of 24 September from Waterman Environmental to Amanda Hughes (see matrix).

25 ***Waste Management***

This is addressed in the paragraph titled "Waste" (Page 60) of the Environmental Statement (see matrix).

26. ***Water Management***

A plan for the connection and use of grey water and the flood management strategy is incorporated within the Environmental Statement. This was also subject to a letter from Waterman Environmental to Rebecca Jane of your office dated 5 November (see matrix).

27. ***West London Line Station Proposals***

We are currently in detailed discussions with your Highways Officers concerning this and a variety of other proposals associated with the development.

283

## Section 106 Matters

Our clients could accept the principle of all of the items set out in your schedule other than the following.

**30. *Contribution to Educational Requirements***

We believe that the inclusion of a 100 space nursery within the development satisfies any requirement associated with this.

**40. *Public Access to Sports and Recreation Facilities***

These proposals have been specifically provided for residents of this development.

**42. *Restriction of B1 units within light industrial use class***

Our clients are willing to identify certain units within the development that are most appropriate for light industrial use, however they would not wish to restrict all B1 areas within the development to specifically B1c.

**43. *Skills Training and Enterprise Support***

The details associated with this element require further discussion and we would be pleased to meet with your colleagues to agree an appropriate solution.

**46. *Vehicular access to the adjacent Cremorne Wharf site via the underground***

I trust that this adequately addresses your requirements. It is clear from the above that the majority of issues that you have raised are incorporated within the new Environmental Statement associated with the amended application. The other material that you have requested is currently in production.

If you would like to discuss any of the above in more detail please feel free to give me a call.

Yours faithfully

*Just Barnett*  
J W POOL

284

**LOTS ROAD POWER STATION DEVELOPMENT  
PLANNING APPLICATION SUBMITTED ON 12 DECEMBER 2002**

**Matrix of the relevant extracts within the Environmental Statement corresponding to  
the issues raised in the letter sent by the Royal Borough of Kensington and Chelsea  
dated 19 September 2002**

	ISSUE	REFERENCE POINT
1.	Affordable Housing	a) Submitted plans produced by Terry Farrell & Partners b) Appendix A1, Section 8, page 46
2.	Chelsea Creek	a) Chapter 5, Section 5.4, page 32 (landscaping and open space) b) Chapter 13 c) Appendix E
3.	Design Matters	a) Appendix A2 b) Section 5.3.5, page 29 c) Figure 5.29 – landscape masterplan d) Landscaping drawings produced by Randle Siddeley
4.	Parking	a) Appendix H b) Section 16.4.1 <u>Note:</u> Total number of spaces to be provided = 400 spaces, of which: 360 will be allocated to the residential units, 250 private spaces and 110 affordable spaces.
5.	Air Quality	a) Chapter 17 b) Section 17.5.1
6.	Archaeological Investigation	a) Section 11.3.4 b) Appendix C2
7.	Colour Drawings	a) Figures 5.20 and 5.21, on page 28 b) Figure 5.34 – open space, page 37 c) Appendix C1 – Brompton cemetery wire line figures are No's 17 – 24 d) Additional drawings still to be submitted
8.	Commercial Units	a) Large scale section drawings to be submitted
9.	Community Facilities	a) Ground floor plan – reference 03/003 b) Figure 5.16, page 25 c) Figure 5.3.4
10.	Construction Materials	a) Figure 6.4.4 b) Figure 7.2.2

11.	Construction Traffic	a)	Chapter 6.7, page 48
12.	EMP	a)	Chapter 7, page 51
		b)	Appendix M
13.	Green Roofing	a)	Plan produced by Randle Siddeley
		b)	Figure 5.28, page 32
		c)	Section 5.4.6, page 36
14.	Land Contamination	a)	Chapter 15, page 127
		b)	Appendix G3
15.	Landscaping & Surface Access	a)	Plans produced by Randle Siddeley & Partners
		b)	Further information to follow regarding the type of traffic to be allowed in the different proposed areas
16.	Lighting	a)	Section 9.4.4, page 59
		b)	Details of the completed development lighting to be submitted and approved under Condition
17.	Neighbourhood Shop	a)	Ground floor plan produced by Terry Farrell & Partners
18.	Phasing	a)	Figures 6.2 – 6.7, page 47
19.	RSL	a)	Negotiations are on-going to identify a specific RSL
20.	Renewable Energy	a)	Section 9.4.8, page 59
		b)	Paragraph titled 'Energy', page 60
21.	Thames Path	a)	Landscape plans produced by Randle Siddeley
22.	Security & Crime Prevention	a)	Section 9.4.3, page 58
		b)	Section 5.3.8, page 32
23.	Daylight & Sunlight	a)	Section 19.3, page 174
		b)	Appendix K2
24.	Transformer	a)	Paragraph titled 'Off Site Sources', page 130
		b)	Section 15.4.7, page 135
25.	Waste Management	a)	Paragraph titled 'Waste', page 60
26.	Water Management	a)	Section 13.6.2
27.	West London Line Proposals	a)	Section 16.3.6, page 143
		b)	Section 16.5.6, page 153
		c)	Section 16.6, page 154

Thorne, John W.: PC-PlanSvc

From: Thorne, John W.: PC-PlanSvc  
Sent: 17 January 2003 18:16  
To: 'Jim Pool'  
Subject: RE: Planning notices / Exhibition

286

A copy of the site notice is in the post to you. We have not placed a further advertisement in the paper.

Your letter of 13th January seems to be unfinished- it tails off half way through the heading to paragraph 46?

John

-----Original Message-----

From: Jim Pool [mailto:Jim.Pool@Montagu-Evans.co.uk]  
Sent: 15 January 2003 11:36  
To: JohnW.Thorne@rbkc.gov.uk  
Subject: Planning notices / Exhibition

John

I've just noticed an error in my previous e mail re timing of the public exhibition. The mon, tues, thurs, fri start time is 11am and not 1 am !!

Also we should consider having a working meeting in a few weeks time to make sure that you have all the necessary info, and that we can address any additional queries that you may have received as a consequence of the consultation exercise. What do you think?

On a separate note can I have copies of any notices that you may have placed on site or in the local papers regarding the submitted amendments? Thanks.

Jim

Jim Pool

This Internet E-mail is intended solely for the person to whom it is addressed. It may contain confidential or privileged information. If you have received it in error, please notify us immediately by telephone and destroy the transmission. You must not copy, distribute or take any action in reliance on it.

**PLANNING AND CONSERVATION**

~~THE TOWN HALL HORNTON STREET LONDON W8 7NX~~

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS

*file*  
**THE ROYAL  
BOROUGH OF**



**KENSINGTON  
AND CHELSEA**

J W Pool  
Montagu Evans  
Premier House  
44-48 Dover Street  
London W1S 4AZ

Switchboard: 020 7 937 5464  
Extension: 2467  
Direct Line: 020 7361 2467  
Facsimile: 020 7361 3463  
Email: johnw.thorne@rbkc.gov.uk

23/01/2003

My reference: DPS/DCSW/JT    Your reference: JWP/ns/PD5824    Please ask for: John W Thorne  
/PP/02/1324

Dear Mr Pool

**Town & Country Planning Act 1990  
Lots Road Power Station SW10**

I write with reference to the Environmental Statement submitted in support of your major planning application for redevelopment of the above site.

The attached letter addressed to Mr Marsh of Waterman Environmental constitutes a request for "further information" under Regulation 19 of the Town & Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999.

Please ensure that sufficient copies of the requested information are available to meet the requirements of the above regulation.

Yours sincerely

M J French  
Executive Director, Planning & Conservation

*file  
copy*

# ENVIRONMENTAL SERVICES

COUNCIL OFFICES PEMBROKE ROAD LONDON W8 6PW

Executive Director MICHAEL STROUD BSc DipTE CEng FICE FIHT FIMgt  
Director of Environmental Health PAUL MORSE MSc MCIEH

Mr J Marsh  
Waterman Environmental  
Versailles Court  
3 Paris Garden  
London  
SE1 8ND

Switchboard: 020 7937 5464  
Extension: 5716  
Direct Line: 020 7341 5716  
Facsimile: 020 7341 5645  
Email: rebecca.jane@rbkc.gov.uk  
Web: www.rbkc.gov.uk

23 January 2003

THE ROYAL  
BOROUGH OF



KENSINGTON  
AND CHELSEA

My reference: RJ/CL/LRAQ/22.01.03 Your reference: FM570/R3/02

Please ask for: Rebecca Jane

Dear John

## Lots Road Dispersion Modelling Study – Appendix I

I have read this appendix with interest and am pleased to see that you have now included predictions of PM<sub>10</sub> and NO<sub>2</sub> for the year 2010. Please could you include all scenarios for 2004/5 and 2010 in one document?

### Construction Traffic

This assessment has still not taken account of construction traffic. Pollution arising from construction traffic could be significant as we work to try to achieve the national air quality objectives for the years 2004/5. It is not accurate to use predicted operational vehicle movements instead of construction vehicles. It must include the vehicles which site workers use to arrive and leave work each day. The vehicle mix used in the construction phase will also be very different to those used in the operational phase, for example, generators, excavators and other heavy plant. They are likely to use different fuels and perform to poorer emission standards - this will have an impact on the on-site emissions and subsequently, air quality. In addition, we think that the predicted number of lorry trips is an underestimate.

### Model Validation

We have previously asked for validation data to show how well the model performs. Having spoken with CERC last December, they have said that it would be possible to provide you with the validation results so that you could include it within the air quality assessment.

CERC informed me that the model was validated for 1999. Was any model verification undertaken? This is a comparison of modelled results versus any local monitoring data at relevant locations. In 1999, Bridge Place was not operating, so how was background data obtained for PM<sub>10</sub>'s?

If you have any queries relating to any of the above, then please do not hesitate to contact me.

Yours sincerely

Rebecca Jane  
Environmental Scientist  
Environmental Quality Unit.

Cc John Thorne – Planning Department RBKC.

# NOTICE OF A PLANNING APPLICATION

TOWN AND COUNTRY PLANNING ACT 1990  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990



Notice is hereby given the Royal Borough of Kensington and Chelsea Council have received an application:

**KENSINGTON  
AND CHELSEA**

- (a) for development of land in or adjacent to a Conservation Area.
- (c) which, if granted, would depart from the provisions of a development plan.
- (f) for development defined as "major" development.
- (g) for development requiring Environmental assessment.

Details are set out below.

Members of the public may inspect copies of the application, the plans and other documents submitted with it at:

The Planning Information Office, 3rd floor, The Town Hall, Hornton Street, W8 7NX between the hours of 9.15 and 4.45 Mondays to Thursdays and 9.15 to 4.30 Fridays;

For applications in the Chelsea area: The Reference Library, Chelsea Old Town Hall, Tel. 020-7361-4158.

For postal areas W10, W11 and W2: The 1st floor, North Kensington Library, 108 Ladbroke Grove, W11, Tel. 020-7727-6583.

Anyone who wishes to make representations about this application should write to the Executive Director of Planning and Conservation at the Town Hall (Dept. 705) within 21 days of the date of this notice. Please note that all letters of representation are public documents and can be seen by any interested parties.

## SCHEDULE

Reference: PP/02/01324/JT

Date: 24/01/2003

### **Lots Road Power Station and Chelsea Creek, London, SW10**

Conversion of Power Station to provide a mix of residential, retail, office, business and restaurant uses, together with erection of a 25 storey residential tower with ground floor gym, a 3-8 storey building incorporating commercial and residential uses, a 9 storey residential



# Waterman Environmental

Consulting Engineers & Scientists

296

Our ref: EN1493/389JM/TS  
Your ref:

Direct fax:  
Direct email:

020 7928 0656  
j.r.marsh@waterman-group.co.uk

Date: 27 January 2003

Rebecca Jane  
Environmental Quality Unit  
Environmental Services  
Royal Borough of Kensington and Chelsea  
Council Offices  
Pembroke Road  
London W8 6PW

EX	HDC	TP	CAC	AD	CLU	AO
DIR						AK
R.B.	- 5 FEB 2003				PLANNING	
K.C.						
N	C	SW	SE	APP	IO	REC
			ARB	FPLN	DES	FEES

Dear Rebecca

## Re: Lots Road Air Quality Assessment and Environmental Management Plan

Further to your letters of 11<sup>th</sup> and 12<sup>th</sup> December 2002, I have now gathered responses from our team. Thank you for the comments that you made, they were very constructive.

My colleague James Blake has responded by telephone on those issues relating to the air quality but, for completeness, I have set out our response to both your letters below. I have also received your letter of 23 January 2003 and the issues referred to are all being addressed.

Should you feel that there are any outstanding issues that require further discussion we would be pleased to meet with you at your soonest convenience and clearly in view of the Planning Committee date of 27 March we are eager to address any remaining matters as soon as possible.

With regard to the Draft EMP that was submitted with the ES, I have detailed below our response to each of the issues. We trust that, at this stage, this provides you with sufficient comfort however, please can you confirm whether you require the EMP to be reissued to you now and, if so, can you request this under Regulation 19 of the EIA Regulations. I will telephone you, on your return to the office on Tuesday, to discuss this.

### Letter dated 12 December 2002 and Letter dated 23 January Construction Traffic

We note your comments. Whilst we would maintain that the modelling and comparisons made represent a worst case situation, in response to your request, a detailed assessment of the anticipated construction traffic generation (including transport for construction workers) is being undertaken by us with input from Taylor Woodrow Construction and Symonds. This data will be added to the baseline flows in the RBKC's existing model to generate construction traffic modelling for 2004/2005. The results of this revised model should be available on or around the 21 February and we will forward our report to you immediately thereafter.

The graphical representation in the latest ES of the construction traffic generated by the proposed works is not, in the opinion of Taylor Woodrow Construction, an underestimate. As noted in the ES these graphs did not include light vehicles. Light vehicles and minibuses used to transport workers will, however, be included in the construction traffic modelling.

Versailles Court 3 Paris Garden London SE1 8ND

t 020 7928 7888 f 020 7928 0656 e environmental@waterman-group.co.uk www.waterman-group.co.uk

Directors: Robert H. Campbell BSc CEng MICE MStructE Simon Handy (MD) BSc(Hons) CEng MICE Alistair M. A. Dalziel BSc MBA CdiPAF MCIM  
David R. Thomson BSc(Hons) MSc AEMA Alex B. Tosetti BSc MSc MCI0B IEng AMICE AEMA Graham R. Hiscocks (Financial) BA(Hons) ACA  
Regional Directors: David R. Brown BSc(Hons) MSc Andrew Ferguson BSc(Hons) MRICS EARA David Hobson BTECH CEng MICE MIHT  
Director of Special Projects: John Whitham MMS MIEM Associates: John R. Marsh BSc(Hons) MSc FGS  
Consultant: Ann Heywood BSc(Hons) FRICS FRGS MIMgt

Waterman Group Offices: Birmingham Bishop's Stortford Bristol Cardiff Cirencester Cork Dublin Dundee Edinburgh Glasgow Harpenden Leeds Lingfield  
Lockington London Manchester Moscow Newcastle Sheffield Solihull Southampton Sydney Warrington Warsaw

Waterman Environmental Limited Registered in England Number 2537063 Registered Office Pickfords Wharf, Clerk Street, London SE1 9DG



291

#### Model Validation

For your reference, please find enclosed the model validation data. It is our intention to incorporate this data into an amalgamated report that will include the construction modelling. With regard to model verification, CERC are satisfied with the performance of the model.

#### PM<sub>10</sub> Modelling

As you are aware, modelling data for the year 2010 has now been incorporated in the latest ES and this compares the results with the new EU and provisional Air Quality Strategy objectives.

#### **Letter Dated 11 December 2002 Environmental Management Plan**

#### Baseline Monitoring

I note your comment; I agree that the point of the baseline monitoring is to establish the current conditions before any work is undertaken, so that any subsequent change can be noted, and actual effects of the work on the environment established. So, for example, if independent short term works are taking place that alter (increase) the noise or dust levels it would seem irrational (and, I would have thought, would not suit your purposes) to define the baseline at this temporary heightened level, particularly if these works cease immediately before the commencement of the works under our control. I think we are actually in agreement on this point!

You may not be aware that the first activity that will be undertaken at the site as a whole will be the demolition of the Oil Storage Building, which has an existing planning approval from Hammersmith and Fulham. We are currently finalising an (voluntary) EMP for the Oil Storage Building demolition and will be submitting this to LBHF in due course. Baseline data for this initial work phase is presently being collected and the intention is to use this data set for the main works EMP also. The extent of LUL decommissioning works at the present is such that no noise or other impacts are perceptible beyond the confines of the power station building and therefore we consider that this monitoring will represent an appropriate baseline.

With a long-term construction programme, the ongoing monitoring provides an indication on how the environment is changing and the EMP for each contract phase will be modified to suit.

In RBKC, the car park excavation and asbestos strip out works are proposed to commence in Spring 2004. The ongoing monitoring data from the Oil Storage Building demolition EMP can therefore be used to update the main contract EMP.

#### Creek Works

I note your comments. The intention is to undertake water quality measurements and regular visual surveys of the creek and we have now included a monitoring procedure into the document. I have spoken to Mr Peel Yates and discussed our proposals with him and I await any further comments or requests that he may have in this regard.

#### The Development Team

The Environmental Manager and Independent Environmental Specialist will be employed by Circadian, however, the identity of these individuals has not been agreed. Once appointments have been made for the various roles and responsibilities outlined the EMP will be updated.



292

There will be a contractual requirement for the Principal Contractor to undertake monitoring at least twice a week during the demolition and ground works for which they may employ an Environmental Manager or use one of their engineers. Monitoring may be increased to a daily frequency if required.

It has been recommended that Circadian employ an environmental consultant/specialist who would be independent of the contractor and provide independent monitoring of the works. This monitoring would typically be weekly noise and dust monitoring during active periods, to audit the effectiveness of the EMP and undertake reviews of the EMP at key stages.

We will be including in the specifications for all work packages that the contractor shall conform to the EMP and, of course, all statutory controls. We will seek prior agreement from you on the detail of the EMP and such issues as the monitoring frequency and positions. The responsibilities of the Principal Contractor and Independent Environmental Specialist will be agreed prior to the works and will be laid out in the Contract Documents and added to the EMP when known.

#### The Programme and Works

Details of the proposed programme are provided in the latest ES.

The current provisional programme on Site A is for the basement car park excavation and ground remediation to take place as a rolling programme between Spring 2004 and Autumn 2005. The Power Station asbestos plant strip-out is scheduled for between Spring 2004 and Winter 2005. The main construction works are phased between Autumn 2005 and late 2008.

The Remediation Strategy provides information on the remediation works but we will add a sentence to the EMP cross-referring to this document.

#### Sensitive Receptors

People external to the site have been included. For the avoidance of doubt, we will make it clearer that sensitive receptors such as schools and residential properties means the people in the buildings rather than the buildings themselves. We will include groundwater in the sensitive receptors table for completeness although it had already been considered elsewhere in the document.

We have not included on-site workers as a sensitive receptor since risks to on-site workers will be controlled through use of Health and Safety (CDM) risk assessments which are not covered within this document. The EMP is not intended to replace any statutory health and safety requirements.

#### Table 2 Asbestos

Your first two points are dealt with in the asbestos procedure in Section 6.2. The release of asbestos fibres will be prevented by use of appropriate asbestos working methodologies that will be subject to approval by the HSE.

The Contractor will be contractually required to comply with all relevant legislation together with HSE approved Codes of Practice and guidance current at the time of the works; these will include, but not necessarily be limited to, the following:



293

- The Control of Asbestos at Work Regulations 2002
- The Asbestos (Licensing) Regulations 1983 (as amended)
- The Special Waste Regulations 1996 (as amended)
- Construction (Design and Management) Regulations 1994

The contractor will be contractually required through the Employers Requirements to provide their method statements for dealing with such eventualities as the prevention of release of fibres to the atmosphere and dealing with unforeseen asbestos. We will make it a requirement that they should submit to you these method statements for your approval.

The actions are likely to be broadly in accordance with the following examples:

#### Methods for prevention of release of fibres to atmosphere

The methodology will obviously be dependant on the form of the asbestos encountered, its situation and how friable it is. Typically, these will include the provision of double sheeted negative pressure enclosures and decontamination units. Asbestos waste such as lagging materials will be double bagged and placed in sealed containers before transporting them off-site. Responsibility for removing the asbestos will rest with the competent contractors employed to remove it.

#### Decontamination Measures

The decontamination measures will typically comprise a self contained purpose-built unit housing separate 'clean' and 'dirty' areas and showering units and other welfare facilities.

#### Unforeseen asbestos

Again, the methodology will obviously be dependant on the form of the asbestos encountered, its situation and how friable it is but it is likely to be in accordance with the following. All such methods will be subject to HSE approval:

- If asbestos cement sheet (bound asbestos) is encountered, work in this particular area shall cease and suitable measures such as damping down shall take place to prevent fibre dispersal. The suspect material shall be clearly marked as such until confirmatory analysis can be undertaken.
- If friable, damaged, non-intact lagging etc are encountered, again, all work in the potentially affected area will cease. Immediate containment measures will be put into place such as the covering and damping down of the suspect material. Air testing will be undertaken immediately to record fibre levels.

### 3. Noise and Vibration

Method Statements mean demolition and construction method statements. These have not been written yet as, typically, they are drawn up once the contractors have been employed and will incorporate specific techniques or equipment available to the contractor. Method Statements are a standard requirement on demolition and construction sites and are written for each work task or area.

### 7. Road Footpath Congestion

Your Transportation and Highways Department will be contacted on by the contractor in due course to agree the traffic management system. We note that the EMP has been handed to your Transportation and Highways Department.



294

#### Use of the River:

The feasibility of using the river has been the subject of ongoing river transport studies. The second stage study is due to be completed by the end of January 2003 and this will be forwarded to you as soon as this is available.

#### 6.2 Asbestos Removal

Air monitoring: we note your comment and would be pleased to copy you in on whatever information you require. We will set up an 'open book' arrangement, whereby the Council can come and inspect records on site, although we will also regularly forward the monitoring data to your offices, if desired.

The details of the asbestos removal will be drawn up in a method statement once the contractors have been appointed. This will be forwarded to the Council and will be subject to agreement of the HSE and yourselves but it will not form part of the EMP.

We will insert a requirement to highlight asbestos monitoring results, which exceed the criteria. The criteria for the monitoring will be in accordance with Health and Safety Executive guidance and will be stated in the asbestos removal method statement.

#### **6.3 Control of Emissions to air**

Damping down is normally carried out using a spray hose to deliver a fine spray over potentially dusty areas. This will be present on site at all times. As described further on in the procedure, damping down (spraying) will be undertaken as required but particularly during dry and/or windy weather.

##### **6.3.4 Action Level**

The air quality monitoring is undertaken over a 5 or 15 minute sampling interval and is therefore considered to be reasonable for this site. The same level has also been accepted on other sites throughout London as a reasonable 'trigger' level. Visual observations of dust will also be responded to.

The EMP will cover the main construction phase of works as well as the remediation works; the remediation strategy will cross-refer to the EMP and vice versa.

Details of the wheel washing that will be used will be submitted once we have further information from the Contractors and know the location of site plant.

Street sweeping will be a combination of manual sweeping by the Gatemans and regular street sweeping using a modern vehicle during the periods when lots of deliveries/waste disposal is being undertaken. The street sweeping will be undertaken under contract, which will also require the street sweeper to be called out at any time if the roads are getting noticeably dirty.

We will amend Bullet point 8 to say that vehicles will have to be turned off at all times when not in use.

Yes, a map will be provided showing dust monitoring positions once agreed. It is likely that up to 8 positions will be established and monitoring from a selection of these will be chosen, dependent upon the working areas.



295

Monitoring will be undertaken at least twice a week during demolition and groundworks but will be more frequent during other phases of the works. At other times, the frequency of monitoring will be dependent upon the type of work being undertaken. The required frequency will be determined by the independent environmental consultant during their weekly monitoring visits.

Due to the higher cost of permanent dust monitors, coupled with difficulties securing an uninterrupted power supply and protection of these monitors, mobile monitoring only is proposed. Fewer positions could be monitored in this manner and it would be more difficult to move the monitors to respond to changes in working areas and wind conditions.

Approximately 2 dust deposition gauges will be located on the site perimeter. The monitors will have to be located within the site boundary to prevent damage or vandalism and therefore, due to space constraints, we would be unable to have any more gauges around the perimeter of Site A. You are correct in assuming that deposition gauges collect a sample of dust whereas hand held dust monitors give an average reading over a specified time period.

#### **6.8. Waste Management and Minimisation**

We will add a paragraph detailing the procedure for ensuring that the material is uncontaminated.

#### **6.13 Monitoring**

The general review is undertaken weekly by the independent environmental consultant during key phases of the work. Audits will be undertaken less frequently during the final stages of construction and fit-out when the risks are significantly lower. Frequency for these audits will be agreed with RBKC and LBHF at the time.

#### **Other Issues**

We will expand upon waste storage issues in the waste management and minimisation section.

We acknowledge that the concrete crusher will need to be authorised. The equipment will also be modern, comply with relevant British Standards and be regularly maintained to ensure that noise and dust is kept to a minimum.

It should be noted that the EMP will be revised for each contract package to ensure that it remains relevant to the work being undertaken at the time. At this stage it is very difficult to provide details on a number of issues until we are able to discuss working methods with the contractors, who will not be employed until planning permission has been granted. This also enables us to incorporate specific, bespoke environmental controls that the contractors may have at their disposal

Yours sincerely

**John Marsh**

cc: John Thorne  
Jonathan Trout  
Jim Pool

Planning Department, RBKC  
Circadian  
Montagu Evans



## Waterman Environmental

Consulting Engineers & Scientists

296

Our ref: G/EN1493/392JM/JMcN  
Your ref:

Direct fax:  
Direct email:

020 7928 0656  
j.r.marsh@waterman-group.co.uk

Date: 28 January 2003

Rebecca Jane  
Environmental Quality Unit  
Environmental Services  
Royal Borough of Kensington and Chelsea  
Council Offices  
Pembroke Road  
London W8 6PW

EX	HDC	TP	CAC	AD	CLU	AO
IR						AK
R.B.	- 5 FEB 2003				PLANNING	
K.C.						
	C	SW	SE	APP	IO	REC
			ARB	FPLN	DES	FEES

Dear Rebecca

### Re: Lots Road Environmental Management Plan

Further to our telephone conversation of today and my letter of 27 January I would wish to clarify our position on the requirement to agree formally a final version of the EMP as a pre-planning requirement.

We consider that it would be appropriate for this issue to be conditioned so that it could be a requirement for the EMP for each phase of work to be subject to the approval of the Environmental Services Department of Royal Borough of Kensington and Chelsea. Each agreed EMP will contain similar provisions to those provided in the ES Appendix but may include additional or varied clauses to cover the specific phase of work under consideration. This is an appropriate way to deal with EMPs and commonly used/adopted by other planning authorities.

Our opinion is that whilst a generic or draft document can be devised and agreed, it is not possible to finalise this document until a later date for the following reasons:

- The Lots Road Project is a long and complex project spanning six years
- The project will include several separate contracts (e.g. Demolition, Asbestos removal, Plant Decommissioning, Earthworks, Construction, fit-out, etc.) that may have different contractors involved and different mechanisms of management. For example, the early phases of work may be let individually to contractors and later phases may have a Construction Manager in place.
- At this stage it is very difficult to provide details on a number of issues until we are able to discuss working methods with the contractors, who will not be employed until planning permission has been granted. This also enables us to incorporate specific, bespoke environmental controls that the contractors may have at their disposal
- As noted in the ES, the EMP incorporated in the ES refers specifically to Site A and it is our intention to finalise this document subject to the timing of the planning approval to address both RBKC and LBHF or one council if the planning approvals do not coincide.
- The sequence and phasing of the work will be subject to the timing of these planning approvals
- The EMP, the associated threshold values, the site environmental management and controls are iterative and will, for each construction phase, take into consideration the environmental conditions and legislation prevailing at that time.
- By having an EMP agreed for an individual package of work it can be tailored better for the work that the contractor is undertaking. For example, the environmental controls on the asbestos removal contract within the power station would be different from those in place during the creek works.

Versailles Court 3 Paris Garden London SE1 8ND

t 020 7928 7888 f 020 7928 0656 e environmental@waterman-group.co.uk www.waterman-group.co.uk

Directors: Robert H. Campbell BSc CEng MICE MStructE Simon Handy (MD) BSc(Hons) CEng MICE Alistair M. A. Dalziel BSc MBA CdpAF MCIM

David R. Thomson BSc(Hons) MSc AEMA Alex B. Tosetti BSc MSc MCIOB IEng AMICE AEMA Graham R. Hiscocks (Financial) BA(Hons) ACA

Regional Directors: David R. Brown BSc(Hons) MSc Andrew Ferguson BSc(Hons) MRICS EARA David Hobson BTECH CEng MICE MIHT

Director of Special Projects: John Whitham MMS MIEM Associates: John R. Marsh BSc(Hons) MSc FGS

Consultant: Ann Heywood BSc(Hons) FRICS FRGS MIMgt

Waterman Group Offices: Birmingham Bishop's Stortford Bristol Cardiff Cirencester Cork Dublin Dundee Edinburgh Glasgow Harpenden Leeds Lingfield

Lockington London Manchester Moscow Newcastle Sheffield Solihull Southampton Sydney Warrington Warsaw

Waterman Environmental Limited Registered in England Number 2537063 Registered Office Pickfords Wharf Clink Street London SE1 9DG



2977

I would note that, we will be including in the specifications for all work packages that the Contractor shall conform to the EMP and, of course, all statutory controls. The Contractor will be contractually required to comply with all relevant legislation together with HSE approved Codes of Practice and guidance current at the time of the works. The Contractor will be contractually required through the Employers Requirements to submit their method statements to you.

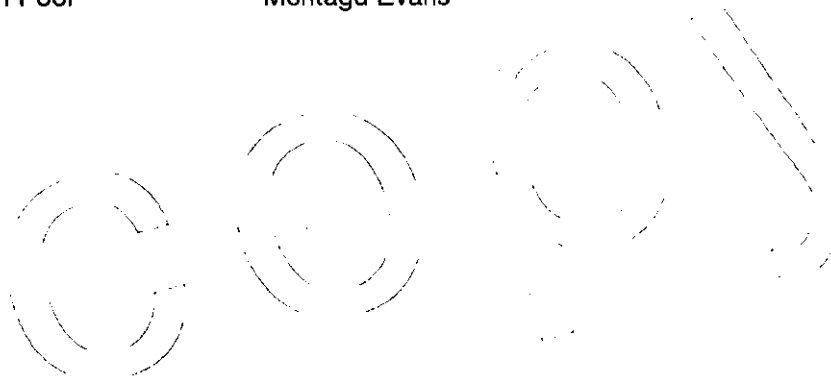
Please let me know if you require any further clarification and I look forward to receiving your feedback in due course.

Yours sincerely

**John Marsh**

cc: John Thorne  
Jonathan Trout  
Jim Pool

Planning Department, RBKC  
Circadian  
Montagu Evans



# ENVIRONMENTAL SERVICES

THE TOWN HALL HORNTON STREET LONDON W8 7NX

Executive Director MICHAEL STROUD BSc DipTE CEng FICE FIHT FIMgt

Director of Transportation and Highways CRAIG WILSON BSc MSc CEng MICE FIHT

Mike Lewin  
Symonds Group  
24-30 Holborn  
LONDON  
EC1N 2LX

John Thorne

Extension: 3747  
Direct Line: 020 7361 3747  
Facsimile: 020 7361 2796  
Email: richard.case@rbkc.gov.uk  
Web: www.rbkc.gov.uk

THE ROYAL  
BOROUGH OF



KENSINGTON  
AND CHELSEA

29 January 2003

My reference: 20177

Your reference:

Please ask for: Richard Case

Dear Mike,

## LOTS ROAD POWER STATION SUPPLEMENTARY TRANSPORT ASSESSMENT

At the meeting held on 23 January and in your letter dated 28 January we have discussed the information that will be required in a supplementary transport assessment for me to report the transport impact of the development. In order to assist your preparation of this information I have set out in detail the areas that will require further clarification, revision or inclusion.

### Sensitivity test

As previously discussed I do not accept that the trip rates used in the assessment to date represent a worst case for the development. I have previously supplied you with (Technical Note 1, February 2002) rates that I require the assessment to be based upon. In summary these are residential rates for private and affordable accommodation and rates for commercial/retail and A3 from the TRAVL database. I am not satisfied that it is robust to constrain trips to the number of on-site car parking spaces. The traffic modelling work will need to be repeated for these trip rates.

### Impact on parking

A3 uses can have a significant impact on on-street parking. I require clarification on what the impact of this development will be and the arrangements that will be made to ensure that patrons use the on-site parking.

### West London Line

I note that TfL have indicated that only 'passive provision' must be made for the increased length of platforms at the WLL station (TfL letter 20/01/03). This is welcomed and the assessment should be modified to improve funding available for streetscape improvements or other measures within the package.

### Environmental Cell

I consider that many of the measures fall in to this package. For example the streetscape improvements in Lots Road and the walking and cycling measures. For this reason I would like the Environmental Cell rebranded as a Streetscape Improvement Zone and a focus on urban quality added. The detail of the measures is more appropriately dealt with once the planning application is determined and measures can be devised to correspond to the councils own programme at the time. The supplementary assessment should clarify this and state that current proposals are for indication purposes only.

### **Lots Road**

The detailed design required to allow buses to use the southern section should form part of the Streetscape Improvement Zone and be considered once the application is determined. Until this is known the arrangements for relocated car parking are not known.

### **Bus Services**

As discussed at next weeks meeting it is appropriate to remove reference to specific services. Instead the assessment should consider the broad objectives. Such as increase links to Earls Court and Kensington High Street; An embankment service to Westminster and Increased services to the new WLL station. The detail will then be discussed with London Buses and the Council once the application is determined.

### **TLRN and Cremorne Road Junction**

I am informed by Traffic Management that the principles behind the modelling are now acceptable, although it will need to be rerun as part of the sensitivity tests. I also understand that the junction design at is now acceptable.

### **Bus Priority**

I understand that the proposals do not include any bus lanes on either the TLRN or the Royal Borough's roads. This should be expressly stated along with the details of the type of priority envisaged.

### **Detailed Geometry**

At our meeting on 20 August 2002 a number of issues were highlighted regarding detailed operation of the site, The supplementary assessment should address these.

### **Phasing**

The supplementary assessment must include details of when the measures will be introduced for example to be implemented at construction, first occupation, completion and the duration of funding.

### **Construction**

I am still awaiting details on expected construction traffic, the use of the river, and the measures that will be available to transport workers to the site.

### **Community Car Club**

I welcome the provision of parking for the City Car Club and would suggest that you contact Chas Ball at Smart Moves on 01484 483061 to discuss arrangements for funding the pool vehicles and whether the vehicles can be part of the Borough's scheme.

### **Travel Information**

For your information Kensington and Chelsea Community Transport have expressed an interest in operating the travel information office as this will assist them in maintaining an office in the South of the Borough- although I suspect that this is a matter of detail for after determination of the application.

I trust that these points are helpful and look forward to receiving the supplementary assessment.

Yours sincerely

  
Richard Case

**Principal Engineer- Transportation and Road Safety**

Cc **Jim Pool, Montague Evans**  
**John Thorne, RBKC Planning**

**PLANNING AND CONSERVATION**

~~THE TOWN HALL HORNTON STREET LONDON W8 7NX~~

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS

**THE ROYAL  
BOROUGH OF**

J W Pool  
Montagu Evans  
Premier House  
44-48 Dover Street  
London W1S 4AZ

Switchboard: 020 7 937 5464  
Extension: 2467  
Direct Line: 020 7361 2467  
Facsimile: 020 7361 3463  
Email: johnw.thorne@rbkc.gov.uk



**KENSINGTON  
AND CHELSEA**

30/01/2003

My reference: DPS/DCSW/JT    Your reference: JWP/ns/PD5824    Please ask for: John W Thorne  
/PP/02/1324

Dear Mr Pool

**Town & Country Planning Act 1990  
Lots Road Power Station SW10**

I write with reference to the Environmental Statement submitted in support of your major planning application for redevelopment of the above site.

The attached letter addressed to Mr Lewin of Symonds Group constitutes a request for "further information" under Regulation 19 of the Town & Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999.

Please ensure that sufficient copies of the requested information are available to meet the requirements of the above regulation.

Yours sincerely

M J French  
Executive Director, Planning & Conservation

R

# Responsibility and remediation

Where land is to be "determined" as "statutory contaminated land", there are a number of stages to be followed:

## ● Identify "appropriate person"

Class 'A' person – original polluter

Class 'B' person – current owner or tenant

Class 'C' person – other (may be the local authority)

If a person knowingly permits pollution to occur, for example, as part of a poorly executed ground investigation that generates migration pathways on site for contaminants and aggravates the situation, then they can be deemed the class 'A' person – in effect, a duty of care.

The local authority will attempt to bring about "voluntary remediation" or, failing that, serve a "remediation notice". The severity of the site problem

would influence the approach, with the ultimate goal being to protect human health. It is possible after suitable notice periods for the local authority to carry out the remediation and to recover costs from the appropriate person/s.

● "Special sites" – where the severity of the situation on site is severe and/or where pollution of controlled waters is involved, then the site can be classified as "special". In this case the enforcement reverts to the EA which will take on the full responsibility for the remediation strategy.

● "Compliance monitoring" – these will become more important as a means of checking the efficiency of remediation schemes once final remediation statements have been "signed off". It is expected that longer-term monitoring will become part and parcel of many future schemes.

authorities, not just land that is zoned for redevelopment, and will form the basis of current and future planning applications.

Historically, land has been assessed using industry profile data sheets and guidance notes for soils from the Inter-Departmental Committee for the Redevelopment of Contaminated Land (ICRCL).

A more robust mathematical modelling system has recently been inflicted on industry by the EA. It has taken a decade to develop and is called the Contaminated Land Exposure Assessment (CLEA). This modelling system has produced a partially complete set of Soil Guideline Values (SGV) to replace the former ICRCL values, which most consultants have grown used to over the past decade. Indications are that careful assessment of a site using the CLEA approach can lead to cost savings for site remediation.

Often the "target concentrations" for soil

contamination means that the current level of contaminants on a site are of no concern for that specific end use. It is also interesting that one or two anomalies can be seen.

For example, the old ICRCL threshold value for mercury was 1mg/kg, but now an SGV value of 8mg/kg is permitted for the same category of residential property, allowing for plant uptake (a form of local allotment). Thus the SGV values have become less stringent with respect to mercury. Each site will need to have its own site-specific assessment if these "target" SGV values are exceeded.

Of potentially greater concern to those developing land is the attention being given to ground water quality. The main issues here are:

● Leaching – the solubility of chemicals in the soil such that water passing them might render them mobile and thus create a "pathway" for them to reach a "receptor";

● Rainwater infiltration – the amount of water recharge the soil is taking that might generate a flow of substances from the soil;

● Groundwater vulnerability – the closeness of the site to a known aquifer, and/or water abstraction points for drinking purposes.

This all forms part of the broader government ambition to clean up all coastal and inland waters by 2015 as part of the EC Groundwater Directive. The wise will see the need for warranties and insurance cover, but the cost of these may escalate in the short term to cover perceived longer-term risks. The clean-up standards of today may not be good enough for future clean-ups, particularly for a different end use.

What is very clear is that the cost of ground investigations will go up, and that more time will be needed for the assessments to be carried out to the higher standard needed. It is also likely to take the local authority and environment agency longer to process the planning applications and discharge any environmental conditions.

## Say hello to CLEA

The CLEA system has well and truly arrived in England and Wales. Scotland has for some time been using a SNIFFER methodology, which was derived for Scotland and Northern Ireland; in the US they use the Risk Based Corrective Action (RBCA) approach. All of these have similar concepts, and use a tolerable daily intake set of chemical exposure reference values.

In future, the local authority and EA have a watching brief and are asking for justifiable data and procedures to be submitted when assessing sites, both in terms of current condition as part of a feasibility study, and also when intended for development as part of a routine planning submission. They might take a much more proactive view on land conditions than they have in the past. All landowners should bear this in mind, irrespective of the currency of their projects.

In conclusion, passive acknowledgement of the presence of contaminated land, and begrudging treatment of the same, is no longer an option. An understanding of the potential consequences of the legislation is as essential as calculating property yields.

It is hard to believe that our industrial forefathers never imagined that the burying and dumping of waste could be harmful.

*Dr Paul H McMahon is director of earth sciences at RoC Consulting in Manchester*

## Where the dirty bits are

### Derelict land and housing demand

Region	% of total area of derelict land	% of total household increase	Balance of brownfield land
South East	7.3	25.2	Shortage
London	4.1	14.4	Shortage
South West	14.0	12.4	Balanced
North West	21.8	10.2	Abundance
East Midlands	11.1	9.5	Balanced
Yorkshire & Humberside	13.8	8.8	Some spare
West Midlands	12.5	8.4	Some spare
East Anglia	2.6	6.5	Shortage
Northern	12.8	4.6	Abundance

Source: DETR & Quoted in POST117

Land polluted by years of industrial activity and carelessness is going to be reclaimed, says government. But how will local authorities go about deciding where to clean up, and who will pay? Dr Paul McMahon reports

# Ways to assess a legacy of mess

On a small and densely populated island, we cannot keep swallowing up a valuable fixed resource. This is especially true when extensive industrial wastelands are laid bare, ravaged by micro and macro-economics, underinvestment and the transformation of the British economy from an industrial manufacturing base to consumer services.

Our land has changed little in the last two decades, but the attitude of government to its condition has changed drastically.

PPG 3 requires that much of our future housing should be constructed on brownfield land. As a result, planning emphasis is on locating new developments on previously used industrial land.

The table opposite shows data that fits with history lessons on the industrial revolution: most former industrial and now derelict sites are in North, but the major housing needs are in the South.

There is a disparity between the availability of derelict land, and the need for more households if we have a national policy that aims to locate a high proportion of new households on brownfield land.

Another factor is that land values are lower in the North, yet remediation costs associated with brownfield sites are generally the same across the country. Therefore, balancing the books on projects in the North can become troublesome and even lead to abandonment without additional funding. It is clear when formulating such government policy that clear guidance on terminology and precise definitions are required, to allow policy objectives to be measured.

The legal definition for contaminated

land, as brought in by section 57 of the Environment Act 1995, and now forming part of section 78 as inserted into the original Environmental Protection Act 1990, and respectfully known as within part IIA of that Environmental Protection Act, is now: "Any land that appears to the local authority in whose area it is situated, to be in such a condition, by reason of substances in, on or under the land, that:

- a. Significant harm is being caused, or there is a significant possibility of such harm being caused; or
- b. Pollution of controlled waters is being, or is likely to be, caused.

This firmly makes the local authority a key

## Waste reduction

The EC Waste Framework Directive is trying to reduce the amount of waste being produced and modernise the way we consider recycling, which culminates in the final disposal of our waste.

This is not just for domestic producers of waste, but also for construction operations. It will become a condition that all materials destined for landfill as a disposal option will need a form of treatment prior to final disposal by landfill or incineration.

Thus construction waste from excavations on site will need to have a pre-treatment stage before it will be allowed into a landfill facility. It is also predicted that landfill tax will be raised quite significantly at the next Budget; thus, the longer-term approach will become one of on-site remediation, and risks will be assessed in a more robust manner. Developers will have to consider warranties and insurance protection.

player in the compilation of public registers of information. It is also worth emphasising at this point that there is a requirement for there to be a "source pathway receptor" mechanism for there to be a "significant risk of significant harm" for the land to be designated as "contaminated land". All of these terms have clear meanings.

The Department of Environment, Food and Rural Affairs (DEFRA) and the Environment Agency (EA) are the key players in setting the rules for local authorities to follow.

However, each local authority was given the duty to produce its own strategy. We await the lead from local authority contaminated land officers, who could be described as being goaded into action by the EA to judge how we have historically abused our land mass. This national audit trail will allow the EA to produce five-yearly reports on the state of our land, the first of which was published in October 2002.

### Phasing-in of assessment procedures

The current situation allows local authorities to phase the assessment procedures between now and 2006, with most having already produced their public domain inspection strategies, and some being well on the way towards full implementation.

The rigorous inspection of all sites with the "potential to be affected by contamination" is a term currently at consultation stage within planning circles, and is being adopted by local authorities when looking at land within their area. Thus all land will be looked at by local

ble in + pc ack -> JKT

Your Ref:  
Our Ref: 03/00364/OBS/  
Date: 10 February 2003

The Royal Borough Of Kensington & Chelsea  
Planning And Conservation  
The Town Hall  
Hornton Street  
London  
W8 7NX



Dear The Royal Borough Of Kensington & Chelsea

This application is submitted under the:  
TOWN AND COUNTRY PLANNING ACT 1990.  
(and associated legislation)

Proposed Development At:	<b>Adjoining Borough Observations Within Kensington And Chelsea</b>
For:	<b>Observation of the proposed development in the adjoining Borough of Kensington and Chelsea of Lots Road Power Station on the site to the north side of Chelsea Creek to include the conversion of the existing power station, 25 storey tower, 420 residential units with associated car parking and public open space.</b>

Received on 13 January 2003 Fee Received: £0.00 Receipt No.

Your application has been received and will first be checked to make sure that you have completed it correctly and that any drawings or plans you have sent are sufficiently detailed. Please treat this letter as a receipt for any fee you may have paid.

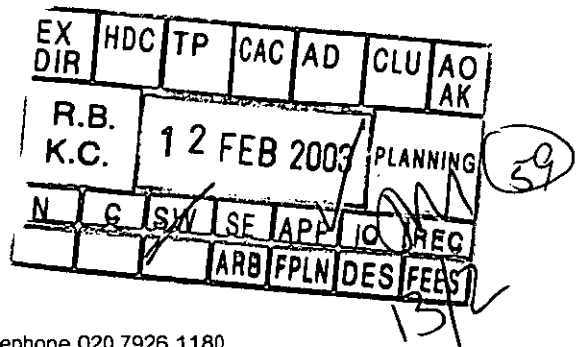
If the application has not been correctly submitted, a further letter will be sent to you soon. If your application is accepted as being valid, you will receive a formal acknowledgement giving you the start date of the Councils consideration of the application.

We will try to advise you whether or not your application is valid within 14 days of the date of this letter. It would help us to process applications more speedily if you did not telephone us to check on the progress of the application during this period.

Yours sincerely

Director of Community Renewal

Lambeth Planning  
Development Control  
Acre House  
10 Acre Lane  
London SW2 5LL



Telephone 020 7926 1180  
Facsimile ~020 7926 1171  
www.lambeth.gov.uk

Your Ref:  
Our Ref: 03/00364/OBS/MG  
Date: 10 February 2003

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.	12 FEB 2003				PLANNING	
N	C	SW	SE	APP	IO	REC
			ARB	FPLN	DES	FEES

304  
56

The Royal Borough Of Kensington & Chelsea  
Planning And Conservation  
The Town Hall  
Hornton Street  
London  
W8 7NX



Dear The Royal Borough Of Kensington & Chelsea

This application is submitted under the:  
TOWN AND COUNTRY PLANNING ACT 1990.  
(and associated legislation)

Proposed Development At:	<b>Adjoining Borough Observations Within Kensington And Chelsea</b>
For:	<b>Observation of the proposed development in the adjoining Borough of Kensington and Chelsea of Lots Road Power Station on the site to the north side of Chelsea Creek to include the conversion of the existing power station, 25 storey tower, 420 residential units with associated car parking and public open space.</b>

I acknowledge receipt of your application and fee in the sum of £0.00 which was received on 13 January 2003. I can confirm that the application was valid on 13 January 2003.

Your case officer is Marian Girdler (Tel: 020 7926 1195) who may contact you regarding this application.

We will endeavour to process your application as soon as possible. However, if you have not been notified of the Council's decision within 8 weeks of the above valid date, you are entitled to appeal directly to the Planning Inspectorate, Room 3/08b Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN any time during the following six months.

If you should appeal the Council will not be able to determine your application as it will then be handled by the Planning Inspectorate's appeal procedure. It may be in your interest to speak to your case officer before considering an appeal.

Your proposal may require approval under the Building Regulations and you should contact the Building Control Helpline on 020 7926 1200 who will be pleased to advise you.

Yours sincerely

Director of Community Renewal

Lambeth Planning  
Development Control  
Acre House  
10 Acre Lane  
London SW2 5LL

Telephone 020 7926 1180  
Facsimile ~020 7926 1171  
[www.lambeth.gov.uk](http://www.lambeth.gov.uk)



Essex, Hertfordshire & London Team  
London Office Devon House 12-15 Dartmouth Street  
Queen Anne's Gate London SW1H 9BL  
Tel +44(0)20 7340 4870 Fax +44(0)20 7340 4880  
Email london@english-nature.org.uk  
www.english-nature.org.uk



Montagu Evans  
Chartered Surveyors  
Premier House  
44-48 Dover Street  
London W1S 4AZ

Your ref: JWP/ns/PD.5824  
Our ref: BO5/7-4

11<sup>th</sup> February 2002

Dear Sir/Madame,

**LOTS ROAD POWER STATION DEVELOPMENT, LAND AT THAMES AVENUE, AND COMBINED IMPACT REPORT, LONDON SW10.**

Thank you for consulting English Nature, as a statutory consultee under the Environmental Impact Assessment Regulations 1999, on the Lots Road EIA. English Nature has previously been consulted with regard to the scoping of the impact assessment for both the residential development and the Lots Road Power Station. Our response to these consultations is attached for your information.

English Nature advice that an EIA should follow best practice survey methodology details of this should be outlined fully in the text. If it is not explained in full in the text, then methodology and analysis should be made available at a named source. This information was not provided in appendix G1/2 where other ecological survey/analysis information was provided.

We must highlight that as a result this EIA falls short of best practice recommendations, by only providing detail of the preliminary invertebrate survey and not outlining detail of other surveys carried out. We further note that the detail of the preliminary invertebrate survey has been edited by CPM and is not the original report. This is somewhat misleading, as it is stated that full details of the survey are included in Appendix 2 (p96 Environment Statement).

The results from the preliminary invertebrate survey displayed habitats on site to be of "medium interest" (36 species of terrestrial invertebrates, including 1 nationally rare, 1 nationally scarce species and 4 uncommon species), however, these same habitats are then judged to be of "low local ecological value". This seems to be contradictory, especially as the edited survey highlights the importance of urban ruderal habitats in the maintenance of nationally important invertebrate faunas.

The current EIA makes no attempt to mitigate for the loss of habitat, bar the suggestion that as a similar area of ruder habitat exists locally means that the loss of this habitat is of minor significance. This is an unsustainable approach, the fact that



INVESTOR IN PEOPLE



Awarded for excellence

working today for nature tomorrow

there is similar habitat in the locality does not mitigate for its loss on this site. Indeed this is especially relevant in relation to terrestrial invertebrates, which are often considered to be relatively immobile.

506

We welcome the provision of gravel mulch and other planting for invertebrates and proposed measures for other fauna on this site (i.e. bat/bird boxes), however the extent of these proposals are not outlined in any detail. The EIA states: "the majority of the terrestrial habitats on the site that will be lost will be replaced as part of the overall landscape strategy for the site development" (p96 Environmental Statement). Without site of this Landscape Strategy it is impossible to assess whether this will mitigate for habitat loss on the site, enabling a sustainably led development.

English Nature advises that all surveys should be carried out at an appropriate time of year for the group being surveyed. The detail of reptile survey methodology was found to be lacking. Reptiles enter hibernation between October and February, as such; October is not the most appropriate time to carry out reptile survey. I have enclosed a copy of a table taken from Protected Species in London (London Ecology Unit, 1999) this outlines the distribution of reptiles and amphibians in Greater London. It is incorrect to suggest that no reptiles exist within inner London Boroughs (p96 Environment Statement).

Further, we note that a recent bat survey has not been undertaken as part of this EIA. Reference was made to the RBKC survey carried out in 1994. As the information from the 1994 survey has not been included, it is not possible to evaluate this in relation to the current EIA. We would suggest, in view of the proposed tree works, that it would be prudent to undertake another bat survey, to ensure that the findings from the 1994 are still valid.

We welcome the proposals to extend the Thames Path National Trail. However it is of concern to note that the proposed development includes limited foreshore encroachment, through the construction of a walkway along the Thames supported by wooden piles. This appears to run contrary to the Environment Agency's policy regarding foreshore encroachment and established best practice for Thames riverside developments (e.g. Greenwich Peninsula) in which provision is made for the setback and extension of foreshore habitat.

It is of concern that no provisions have been put in place to limit disturbance to foraging birds on the intertidal foreshore. Indeed, it is stated, that this increase in disturbance will be compensated for by, the birds utilising other foraging opportunities further along the Thames foreshore. English Nature objects to such an unsustainable approach.

We suggest that advice is taken from the Environment Agency on riverbank design options. The EA can assist with development of detailed plans for the set back of river walls. This approach has many benefits such as the creation of foreshore habitat, the reduction of disturbance and increased recreational benefits, whilst still maintaining flood defence.

A large-scale development such as this, offers considerable potential for environmental mitigation. The current proposal and associated planning application

does not currently represent a truly sustainable approach to development, an approach that ensures effective protection of the environment and prudent use of natural resources (HMSO 1999).

Please do not hesitate to consult me should you require further information on the points raised.

Yours faithfully

Alex Machin  
Conservation Officer

307