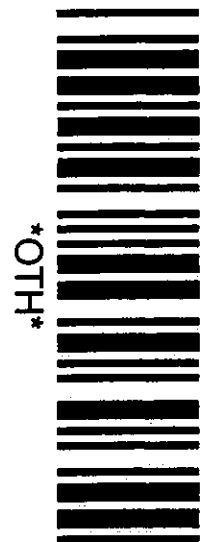


**ROYAL BOROUGH
OF
KENSINGTON & CHELSEA**

DOCUMENT SEPARATOR

DOCUMENT TYPE:

OTHER



OTH

10th Feb 2003 bk in + pcach
→ JT

F.a.o: John Thorne



ENVIRONMENT
AGENCY

For your information, initial comments
on Lacs Road.

Detailed, formal response to follow

Regards

Deborah Simon
Planning Liaison.

with compliments

Environment Agency
Apollo Court, 2 Bishop Square Business Park, St. Albans Road West, Hatfield, Herts AL10 9EX
Tel 01707 632300 Fax 01707 632500

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ENVIRONMENT
AGENCY

Date: 10th February 2003

BY E-MAIL & BY POST

309

Mr John Marsh
Waterman Environmental
Versailles Court
3 Paris Gardens
London
SE1 8ND

Dear John

Re: Lots Road meeting to be held on 12th February 2003
Items for discussion

Prior to our meeting on Wednesday, please find attached issues we would like to discuss. These issues arise from our review of the December 2002 Environmental Statement and application for Lots Road. They are our initial comments only and the purpose of forwarding them to you is to give you time to consider our response and to generally help the meeting run productively. The majority of our comments clarify the requirements of which you are already aware. We consider that it is vital that the application drawings clearly show the relevant details.

Alongside these comments we would also like to discuss proposals for using the Creek to promote water recreation and how these proposals could fit in with the current application.

For ease I summarise the issues arising from the current application below.

1. The Agency is still concerned over the encroachment into the Chelsea Creek, which will increase the water levels upstream and downstream of the site and increase the risk of flooding due to the reduction in flood storage capacity. We need to be satisfied that there is no net loss in storage volume due to the proposals taking a Creek bed topography based on sedimentation no greater than the principles we have previously agreed. We will need to see at least A3 sized drawings of Figures F1 to F10 of Appendix E, as the current A4 sized drawings are very difficult to read. There is also a lack of consistency between the drawings e.g. architects and landscape architects and Waterman Environmental drawings; Randall Siddeley drawings 3 & 4/12.



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2. The Agency is also still concerned that the proposals include development in close proximity to the Chelsea Creek. This will prejudice flood defence interests and adversely affect the ecological value and character of the watercourse, and restrict necessary access to the watercourse for the Environment Agency to carry out its functions. We need to be satisfied that adequate access is provided to the land adjacent to the River Thames and Chelsea Creek in order for the Agency to carry out its functions and allow flood defence interests to be addressed.

As a minimum, the drawings should show the following improvements/ additions:

- a) A minimum clear access everywhere of 5m to and along the Creekside and Thameside e.g. at Blocks HF1, 3A, 3B, 3C, KC 4.
- b) Repositioning of trees, bollards and lighting standards to provide the minimum 5m to and along the Creek
- c) Show how a raising of the flood defence requirement by 600mm can be accommodated without leading to loss of flood storage or access to the river walls and flood defences.

3. The Agency remains concerned that the proposals contain insufficient information describing the alterations to the River/ Creek walls and construction work to the rear of the tidal flood defences. It is therefore not possible to fully ascertain the impact of the development on the River/ Creek and access to the Flood Defences.

We would need to see further information detailing the works to be undertaken.

As a minimum the drawings should be adequately sized and accurately show / include:

- a) The basement car parks and walls remodelling in plan and section with regard to the existing Creek and Thames walls.
- b) Levels and gradients as appropriate
- c) Further sections to illustrate the vertical alignment of building floors and projection.
- d) Clear widths for riverside access preferably with dimensions. This cannot be verified by line drawings and typical sections.
- e) Headrooms to bridges over the Creek and Creekside corridor.
- f) The new line of the statutory flood defences.
- g) Terraces must also be represented on the architects drawings
- h) Treatment of the creek bed

4. We would like you to confirm if the middle bridge lines up with the entrance in the power station, or whether it stops just to the right. We would want to see the bridge relate to the entrance as it would appear odd if it stopped to the right.

5. We appreciate that the building design has been amended to greater reflect the relationship with the river. The curved landform on the northern side of the creek responds well to the environment, while the south side does not match. We would like the top of the wall to echo the same form. Consideration could be given to the feasibility of the flood defence height being retreated, keeping the curved form but therefore introducing another terraced level - this could be treated as an amphitheater effect allowing people to gather on the north shore and look over to the terraces on the southern shore. We would welcome discussion on this point.

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6. The riverside park opposite the power station is beginning to look good, however the space is still separated from the creek by the flood defence wall. This could be retreated into the park and the park developed as an amphitheater structure with clear views to the creek. This would connect the space with the river more effectively. We would like at the meeting to consider this use of space and the relationship to the Creek.
 7. Building KC 2 presents an interesting new feature and we would like to discuss the open space between this area and the Thameside Tower; how it meets the Creek and linking pathways. We would also like to discuss the Creek path, proposed widths for access and movement.
 8. The square riverside park on the Thames is disappointing because the level change is at the riverside pathway rather than the whole square, again separating the space from the river so that rather than an incidental park along the riverside that people could enjoy - one develops a separate space that could be perceived as private space. Views from the back of the space are unlikely to connect to the river. Staggering the level change across the park so that it falls gently towards the river and moving the line of trees to the 'back' would provide excellent river views and would be preferable. We would welcome a discussion on this.
 9. The Agency is concerned that there may be an increase in the amount of concrete across the base of the creek bed. We would like to have further clarification concerning the proposals to the creek, as there are inconsistencies within the report.
Page 112 of the ES indicates that there will be a concrete creek bed and page 41 of the ES indicates that the base of the creek will be engineered and beach pebbles and boulders introduced to the base of the creek. We are concerned about the further introduction of concrete along the length of the creek. The concrete currently existing within the creek should be removed and there must be no further hardening of the creek bed. There are also proposals to introduce pebbles and gravel into the creek bed. This type of substrate will be provided by the gabions within the terrace and a layer of this substrate within the channels will probably just become silted. A more ecologically sensitive treatment of the creekbed must be proposed for example, the existing concrete removed and the channel left as natural substrate.
 10. We are also still concerned about the inclusion of groynes within the proposals. This is not appropriate to the locality and may increase siltation within the creek. We however would support the inclusion of wooden posts which would provide ecological benefits and amenity value, the connecting wooden structures however must be removed.
 11. The Agency would object to the proposal to shut the tide out of the creek for several months and we disagree that this will have a minor impact on the creekside ecology. The River Thames is designated along with its associated river wall and adjacent riverside as a Site of Metropolitan Importance for Nature Conservation containing important habitats such as mud-flats, shingle, inter-tidal vegetation and beach, not found elsewhere in London and supporting a large variety of flora and

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fauna. The Environmental Statement has recognised the creek's importance however we disagree with a number of points and conclusions concerning the loss and disturbance of this intertidal habitat, for example we do not think that there is sufficient evidence to conclude that within the 'do nothing' situation there will be an eventual loss of aquatic environment and resulting loss of all species currently utilising the site. The scour pool may remain open due to the impact of scouring from the receding tide and therefore not become completely infilled. We do not consider that due to the loss of the thermal plume there would be a loss of young migrating fish such as bass. During routine surveying and experience gained in this field we have found that inlets along the Thames are of considerable ecological value, especially to juvenile fish, even without any differing water temperatures. The young fish utilise these refugia to escape the main flow, in particular during times of poor water quality. Past encroachment has led to a reduction in such irreplaceable habitats; therefore the few remaining are of particular importance. We also therefore do not support the opinion that the use of this habitat by water birds for feeding will cease as there will still be fish and invertebrates within the creek and recent visits to this site have shown a number of grey herons still utilising the creek.

12. The Agency supports the inclusion of the green roofs on blocks HF3-A, HF3-B and HF3-C and the aim to encourage the development of ruderal communities (plants that grow on waste ground) on these blocks. The existing Lots road site is a wasteland site and through development an extensive area of ruderal habitat including a nationally scarce and very local species of invertebrate will be lost. This impact must be mitigated, therefore we asked that this habitat be recreated either on or off site and subsequently agreed to the use of green/ brown roofs. Unfortunately the planting lists/ treatments on page 43 of the ES are not species indicative of wastelands e.g. *Sedum* may completely colonise the roof and not allow the areas to remain bare. This planting list would not provide suitable mitigate for the loss of wasteland habitat potentially supporting black redstarts, a protected species under Schedule 1 of the Wildlife and Countryside Act 1981. Landscaping with the aim to encourage the development of ruderal communities should be provided and we suggests that the information previously provided is referred to, or the website <http://www.blackredstarts.org.uk/>
13. The Agency would also like to make clear that we will object to the inclusion of semi- ornamental planting adjacent to the watercourses. The environmental statement indicates that native shrubs and trees will be planted, which is supported by the Agency, however it also indicates that that there will be semi- ornamental planting within the creek-side. Planting in this location must comprise of native species only. The planting should also be appropriate to the riverside locality and the soil type of the site. Use of locally native species in landscaping plans is essential in order to benefit local wildlife and to help maintain the region's natural balance of flora. It will also help to prevent the spread of invasive, alien species within the region.
14. The Agency would like to support the use of best practice to prevent contamination of the creek and basin during construction, the use of sympathetic lighting adjacent to the foreshore. Concerning the section on energy on page 60 of the ES you should also note that inclusion of green/ brown roofs will increase

energy efficiency within the buildings. The Agency supports the need recognised within the Environmental Statement for future monitoring of the site after the development has taken place. The Agency supports the inclusion of ledges into the roof design. The inclusion of the high tide roosts along the blocks adjacent to the creek are very important to mitigate the impact of the development on Grey Heron which is a priority species.

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CANOE COURSE

Proposals for Using the Creek to Promote Water Recreation –

The Agency looks forward to introducing the Canoe Concept at our meeting on the 12th February

Under the Environment Act 1995; the Agency has a duty to promote water recreation. Accordingly the Agency wishes to encourage facilities or water conditions that will support such interests.

The Lots Road Power Station outfalls have had an historic use as a facility for canoe training. We also see that the current development proposals for Lots Road and the Creek seek a sweetening flow along the Creek into the River Thames. Accordingly the promotion by the Agency of the concept of a canoeing course being constructed in the Creek is not unrelated to past and prospective aspirations.

The Agency has been in communication with the British Canoe Union (BCU) who are the governing body for canoeing and believe this is a unique opportunity.

Following consultation with the BCU we put the idea to the Senior Planners in the London Boroughs of Kensington and Chelsea and Hammersmith and Fulham. The Planners (John Thorne of Kensington & Chelsea and Paul Entwistle of Hammersmith & Fulham) agreed to put the concept to their Councils and encouraged us to discuss the Plan with you at our meeting.

The canoe course would be a series of pools and falls using pumped water. Subject to technical design detail the course would include environmental benefits. The Creek would remain tidal but again subject to design detail the upper section could introduce a benefit against silting and the lower section may also bring a flushing benefit against siltation of the creek.

The current plan also shows our wish for public access to the Thames path and along the side of the Creek by the use of riverside paths of a width that provides for public benefit and safety.

I look forward to discussing this proposal and our comments on the Environmental Statement with you at our meeting next week.

Yours sincerely

Deborah Simons

Deborah Simons
Planning Liaison Officer
NE Area, Thames Region

Direct Dial: 01707 632405

Direct Fax: 01707 632515

Or e-mail deborah.simons@environment-agency.gov.uk

cc. EA dist: Ian Blackburn, Colin Woodward, Julie Baxter
Toni Scarr, Liz Jones, Henry Gordon Lennox
Paul Entwistle, Hammersmith & Fulham
John Thorne, Royal Borough of Kensington & Chelsea

3/4



Waterman Environmental

Consulting Engineers & Scientists

315

Our ref: EN1493/C/397JM
Your ref:

Direct fax: 020 7928 0656
Direct email: j.r.marsh@waterman-group.co.uk

Date: 14 February 2003

Deborah Simons
Environment Agency
Apollo House
2 Bishops Square Business Park
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AL10 9EX

PC ACK
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Dear Deborah

Re: Lots Road Development Meeting 12/3/03

Further to our meeting of yesterday on behalf of Circadian we confirm the following items as discussed making reference to the numbering given in your letter of 10 February 2003.

1. We note that the creek terrace proposals included in the planning application of December 2002 are unchanged with respect to the flood storage calculations that were previously agreed with Ian Blackburn following the submission of the Environmental Statement Addendum dated August 2002, that was submitted with respect to the Environmental Statement submitted on 7 June 2002.

The Waterman Environmental drawing illustrating the basis of the flood storage calculations, Figure F2 included in Appendix E of the ES, represent the proposed extents and levels of the creek modifications and results in no net loss of flood storage capacity with respect to the agreed baseline.

Six copies of figures F1-F10 were issued to the Agency to scale and at A3 size at the meeting. Revision A of Drawings F4, F5, F6 and F8 were issued to the Agency illustrating how the proposed flood defences could accommodate an increase in flood defence levels of 600mm. Such alterations do not alter the basis of the flood storage capacity calculations.

For the benefit of the Agency the outline of the existing creek wall and proposed flood defence will be added to relevant Architects drawings.

The EA are to confirm any additional points of clarification by 19/2/03.

2. It was acknowledged by the EA that the basis of the previous discussions with respect to provision of access to the land adjacent to the River Thames and Chelsea Creek in order for the Agency to carry out its functions and allow flood defence interests to be addressed was a minimum of 5m along the Thames frontage and 4m along the Creek frontage.

It was noted that the proposals include the retreating of flood defences along much of the southern creek frontage and whilst a path width of 4m is shown, the distance between the new creek path outer edge and the proposed residential buildings is increased by the presence of garden areas. Following the meeting this total distance has been measured and at all locations along the creekside walk the width is greater than 5m.

Versailles Court 3 Paris Garden London SE1 8ND

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David R. Thomson BSc(Hons) MSc AIEMA Alex B. Tosetti BSc MSc MCIOB IEng AMICE AIEMA Graham R. Hiscocks (Financial) BA(Hons) ACA
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Director of Special Projects: John Whitham MMS MIEM Associates: John R. Marsh BSc(Hons) MSc FGS
Consultant: Ann Heywood BSc(Hons) FRICS FRGS MIMgt

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Lockington London Manchester Moscow Newcastle Sheffield Solihull Southampton Sydney Warrington Warsaw
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The EA noted that an objection could be raised as a result of the proximity of the corner of building HF3A to Chelsea Creek. We would note that currently at the site, access and in particular vehicular access, to the landward side of the flood defence structure is restricted along approximately 80m of the south side of the creek frontage as a result of the presence of the oil storage building and the high pressure gas compound. The application proposals include the removal of these existing buildings and the provision of, a minimum 4m wide, access route to all areas along the southern creek frontage.

3. It was noted that the existing drawings including the Architects section drawings, figures F1-F10 and text included in the Environmental Statement provide details of the following:
- The basement car parks and walls remodelling in plan and section with regard to the existing Creek and Thames walls.
 - Levels and gradients as appropriate
 - Sections illustrating the vertical alignment of building floors and projection.
 - Clear widths for riverside access with dimensions.
 - Headrooms to bridges over the Creek and Creekside corridor.
 - The new line of the statutory flood defences.

Six copies of a marked up version of the Landscape Architects soft landscaping masterplan were issued to the Environment Agency. This drawing includes levels to creek paths and the creek bed that were previously included on Waterman Environmental drawing F10.

It was confirmed in the meeting that the creek bed proposals are not to include the wholesale use of concrete as the surface finish. Whilst the founding substrate for the gabion structures would most likely include concrete, the surface finishes to the creek bed will be natural materials and substrates.

The EA are to confirm any additional points of clarification by 19/2/03.

4. The alignment of the creek bridges was discussed and it was noted that the detailed design would be subject to the agreement of the Boroughs and EA through appropriate planning conditions.
- 5-8. It was concluded that none of these items were items that might arise in an objection and that they could be adequately conditioned.
9. See 3 above.
10. It was confirmed that the solid structure of the proposed groynes would be removed to leave timber posts.
11. It was noted by Circadian that the creek works would be phased and undertaken in sections. The proposed engineering methodologies will be submitted to the EA and subject to their reasonable agreement. The phased creek works will not be undertaken with the complete shutting off of the creek tidal flow.
12. The proposed green (brown) roof will not include Sedum and the surface finishes and planting schedule will be subject to the agreement of the EA.
13. Planting to the watercourse margins will be native species only.



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14. The EA proposals for a canoe course are noted.

I trust that this is acceptable.

Yours sincerely

John Marsh
For and on behalf of Waterman Environmental

cc	Jonathan Trout	Circadian
	Jim Pool	Montagu Evans
	Lenny Davis	Environment Agency
	Ian Blackburn	Environment Agency
	Antonia Scarr	Environment Agency
	Henry Gordon-Lennox	Environment Agency
	Julie Baxter	Environment Agency
	Liz Jones	Environment Agency
	Colin Woodward	Environment Agency
	Paul Entwistle	London Borough of Hammersmith and Fulham
	John Thorne	Royal Borough of Kensington and Chelsea

M J French
 Executive Director, Planning and Conservation
 Royal Borough of Kensington and Chelsea
 The Town Hall
 Hornton Street
 London W8 7NX

S/S 318

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Email: alex.machin@english-nature.org.uk
 Our ref: BO5/2-10/21-1
 17.02.03

Dear Mr French

**Town and Country Planning (Environmental Impact Assessment)
 (England and Wales) Regulations 1999
 Lots Road Power Station, Lots Road London SW10**

Thank you for your letter of 9th January concerning the above.

English Nature can confirm that the proposed development does not affect any statutory sites of nature conservation importance (i.e. Sites of Special Scientific Interest, Local Nature Reserves etc.)

As highlighted in previous correspondence, the application does have the potential to affect the nature conservation interest of the tidal Thames (including Chelsea Creek) and the terrestrial habitats that have developed on vacant, underused or derelict parts of the existing power station site. As such we welcome the extensive mitigation measure outlined in the Environmental Statement.

We note that the consultants acting for the applicant have undertaken a range of ecological surveys and have specifically addressed the aquatic nature conservation issues in discussions with the Environment Agency.

In general terms English Nature is content that the proposed mitigation in respect of ecological and nature conservation issues is appropriate. We particularly welcome the proposals to enhance the intertidal habitats of Chelsea Creek, although we recommend that you seek a view from the Environment Agency as to the suitability of the specific proposals outlined in the Environmental Statement.

The EIA invertebrate survey highlighted the importance of urban ruderal habitats in the maintenance of nationally important invertebrate faunas. The results from the preliminary

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invertebrate survey displayed habitats on site to be or "medium interest" (36 species of terrestrial invertebrates, including 1 nationally rare, 1 nationally scarce species and 4 uncommon species). We were concerned that mitigation should take account of this feature (letter dated 11.02.03 is attached). As such, we strongly welcome the proposals to install extensive green roofs within the development area, with particular regard to habitat creation for invertebrates and black redstart.

However, we would highlight that indicative list of species treatment for these roofs would not be ideally suited to these species needs, which are known to prefer gravel mulch and other planting. We would recommend that the consultant refer to the black redstart web site: www.blackredstart.org.uk.

It is unclear whether the development team includes ecological consultants. We would strongly recommend, in view of ecological sensitivities of the site, that a competent ecologist should be part of this development team. The bird survey highlights the potential for breeding birds on this site and note that an Environmental Management Plan is to be worked up with the Environment Agency. English Nature welcomes this approach and would expect to be consulted on issues relating to protected species.

Should your council determine in favour of this application we recommend that you attach appropriate conditions requiring the preparation and implementation of a full ecological mitigation and enhancement plan that addresses all of the matters described in section 14.5 of the Environmental Statement.

I hope you find these observations useful. Please do not hesitate to contact us if you require any further information or advice.

Yours sincerely



Alex Machin
Conservation Officer

CC: Mr Paul Entwistle, Hammersmith and Fulham

Thorne, John W.: PC-PlanSvc

To: Deborah simons
Subject: RE: Chelsea Harbour /Lots Road Power Station development

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My latest information is that we are unlikely to go to committee before the last week in April so I'm not urgently in need of your comments just yet. Obviously if they imply amendments to the scheme it's a case of sooner the better.

-JT

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

From: Deborah simons [mailto:deborah.simons@environment-agency.gov.uk]
Sent: 20 February 2003 11:27
To: paul.entwistle@lbhf.gov.uk
Cc: JohnW.Thorne@rbkc.gov.uk
Subject: Re: Chelsea Harbour /Lots Road Power Station development

Hello Paul. Sorry I didn't reply yesterday, but I was out at a meeting discussing this development! I've copied this email to John Thorne, just so he is aware of where the Agency is - I hope you don't mind.

The position we're in at the moment is we're clarifying actions (and our position) from our meeting with the developers last week. We're awaiting a number of architects and landscape architect drawings showing the proposed new line of bank and terraces - as these haven't been consistent with Watermans drawings. I'm clarifying what we expect to receive from the developers in a letter to them today (which I'll copy to you).

Also, we're expecting a letter from Watermans confirming several points regarding the treatment of the creek bed, planting, treatment of the creek during construction etc.

Many of our concerns, I hope, will be met by these drawings and letters (and subsequent conditions) and I'd very much like to have these before we send you our formal response. If they meet our requirements it's likely we'll have one remaining objection related to the revision of building HF3A, as its placement means there isn't an adequate buffer/ access zone along the full length of the watercourse.

Would it be possible to have an extension to your deadline of 21 Feb to allow us time to get these drawings/ letters and to assess them? I'd include the drawings and letter as part of our formal response.

John - for consistency, I'd like to send you our response at the same time, is this OK with you?

Deborah

>>> Entwistle Paul <paul.entwistle@lbhf.gov.uk> 02/19/03 04:30pm >>>
Hello Deborah, I have not yet received the Env. Agency's formal comments on this application and time is running out. My report needs to be completed by 21 February. I would appreciate knowing whether you will have any objections please.

Paul Entwistle
Environment Department
LB Hammersmith and Fulham
0208 753 3472

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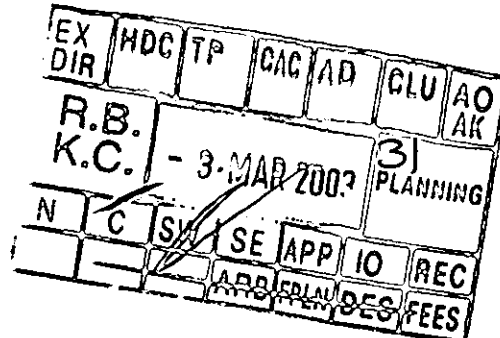
Our ref: EN1493/C/399JM
Your ref:

Direct fax: 020 7928 0656
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Date: 25 February 2003

Deborah Simons
Environment Agency
Apollo House
2 Bishops Square Business Park
St Albans Road West
Hatfield
AL10 9EX

Dear Deborah



Re: Lots Road Development Meeting 12 February 2003

Further to our meeting of 12 February, our letter of 14 February and your letter of 20 February 2003, please find enclosed a full set of drawings F1 to F10 previously submitted as part of Appendix E of the ES. I have copied this to both of the boroughs and for completeness for their benefit I summarise the points that each drawing clarifies and note any revisions that have been made to these illustrations.

Drawing	Revision	Point of clarification
F1 Approximate Extent of Site Below Flood Defence	-	Reissued at A3 - to scale. Unchanged
F2 Terrace Areas	-	Reissued at A3 - to scale. Unchanged. This drawing forms the basis of the agreed calculations made for flood storage capacity and is unchanged relative to the previously agreed drawings issued to the EA as submitted as part of the Environmental Statement.
F3 Creek Section A - A	-	Reissued at A3 - to scale. Unchanged
F4 Creek Section B - B	Rev A	Line showing flood defence extended upwards to show how the future raising of the flood defences (by 600mm) above the current Statutory level (5.41mAOD) could be achieved without changing current flood storage calculations.
F5 Creek Section C - C	Rev A	Line showing flood defence extended upwards to show how the future raising of the flood defences (by 600mm) above the current Statutory level (5.41mAOD) could be achieved without changing current flood storage calculations.
F6 Creek Section D - D	Rev B	Amended to make consistent with figure F2 and landscape architect and architect drawings. Flood defence wall shown to rear of creek path.
F7 Creek Section E - E	-	Reissued at A3 - to scale. Unchanged
F8 Creek Section F - F	Rev A	Clarification of position of access path
F9 Proposed Creek Terrace Layout Section	Rev A	Amendment of this illustration to make building layout on RBKC consistent with Architects drawings.
F10 Access To Creek Frontage	Rev A	Amendment of this illustration to make building layout on RBKC consistent with Architects drawings.

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1. Submitted under separate cover to the planning department and copied to the EA are Landscape Architect and Architect drawings that have been the subject of minor clarifications. These clarifications do not affect in any way the conclusions of the ES. For consistency the existing and proposed creek walls are now shown on these drawings.
2. Clear access to the base of HF1 and KC1 - The Architects drawings have been amended to illustrate this and will be submitted under separate cover. TFP drawing LRTW4/PA/05-005 has been amended and illustrates that the 5m wide vertical access extends upwards as well and is not just at ground level.

The ramp between blocks HF1 and HF2 will provide a minimum clear access width of 5m and this is illustrated on the Architect's scale drawings.

Block KC4 will be constructed wholly within the footprint of the existing building at this location. KC4 will not reduce or hinder the access to the creek wall. The landward access to the creek wall and the creek wall is not and will not be under the ownership or control of Circadian. We note that the recently constructed LUL Bulk Supply Unit is situated immediately adjacent to the creek wall at between approximately 1.5m and 2.5m from the river wall.

Drawings RS drg. 589/04 and TF&P LRTW4/PA/06-021, 22 and 05-005 have been amended to make them consistent.

A drawing is enclosed illustrating how access to the river frontage can be achieved at the location of building HF3A.

- 2.ii Path widths and the Agency's Recreation and Landscape interests (former objection no. 6 to previous application):- It is confirmed that the low wall feature e.g. shown in drawing no. 589/07 Randle Siddeley, is replaced by a railing feature e.g. as shown in drawing no. 589/08. At these locations the flood defence line is now clearly indicated to be to the rear side (landward) of the creek pathway. This is consistent with the flood storage calculations that were previously agreed with the EA. We note the future possibility for this flood defence structure to be further retreated into the creekside park, with the omission of the wall and the grading of the park from the path level (4.0mAOD) to the site level (7.0mAOD). This latter point is also noted in your letter item 5-8 and you have confirmed that this can be conditioned.
3. As noted in my letter of 14 February, 'It was confirmed in the meeting that the creek bed proposals are not to include the wholesale use of concrete as the surface finish. Whilst the founding substrate for the gabion structures would most likely include concrete, the surface finishes to the creek bed will be natural materials and substrates.' We confirm that this is the case and that there will be no concrete bed to the creek and the area where there is no terracing will be left as a natural substrate which will include looking at removing the existing concrete within the channel. No gravel/pebbles will be introduced into the bottom of the creek bed.
4. We welcome your agreement.
- 5-8 We welcome your confirmation that the retreating of the flood defence can be conditioned. We confirm that there will be an access / egress point from the path adjacent to the creekside park to the creek and we welcome your confirmation that this can be conditioned. As discussed in my telephone conversation with Colin Woodward, the landscape architect is in the process of exploring some design options for this access / egress point and these will be sent to you in due course.
10. As noted in my letter of 14 February, 'It was confirmed that the solid structure of the proposed groynes would be removed to leave timber posts.' We confirm that this will be the case and that there will be no interconnecting wooden structures and only the wooden posts will remain.



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11. As noted in my letter of 14 February, 'It was noted by Circadian that the creek works would be phased and undertaken in sections. The proposed engineering methodologies will be submitted to the EA and subject to their reasonable agreement. The phased creek works will not be undertaken with the complete shutting off of the creek tidal flow.' We confirm that this will be the case and we welcome your confirmation that this will be subject to a condition requesting a methodology is approved showing the phasing of the works.
12. As noted in my letter of 14 February, 'The proposed green (brown) roof will not include Sedum and the surface finishes and planting schedule will be subject to the agreement of the EA' we confirm that this will be the case and that the landscaping associated with the green roofs will be designed to achieve a ruderal type habitat in order to mitigate the impact of the development on the wasteland habitat. We welcome your confirmation that the detail will be subject to a condition.
13. As noted in my letter of 14 February, 'Planting to the watercourse margins will be native species only' we confirm that this is the case and that there will be no planting of semi-ornamentals within the creek and the area adjacent to the creek and Thames including the Creekside Park. We welcome your confirmation that the detail will be subject to a condition.

I trust that this is acceptable.

Yours sincerely

John Marsh
For and on behalf of Waterman Environmental

cc	Jonathan Trout	Circadian
	Jim Pool	Montagu Evans
	Lenny Davis	Environment Agency
	Ian Blackburn	Environment Agency
	Antonia Scarr	Environment Agency
	Henry Gordon-Lennox	Environment Agency
	Julie Baxter	Environment Agency
	Liz Jones	Environment Agency
	Colin Woodward	Environment Agency
	Paul Entwistle	London Borough of Hammersmith and Fulham
	John Thorne	Royal Borough of Kensington and Chelsea

26 February 2003

Lots Road Power Station

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

**planning applications nos. DPS/DCWS/PP/02/1324&1325/J
2002/1366/P & 1368/P**

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

Redevelopment and conversion of the existing power station for residential (69,073 sq.m.), A1, A2 and A3 retail and restaurant use (2,115 sq.m.), B1 office and commercial use (6459 sq.m.) and development of new residential flats adjacent to Chelsea Creek to include one 122m high tower (37 storeys) and one 85m high tower (25 storeys) and the provision of basement level car parking within the refurbished power station comprising 627 car parking spaces (425 for the private residential and 202 for the affordable accommodation); providing an on site total of 817 residential units with 382 being affordable (47%).

Context

1 On 25 June 2002 Hammersmith & Fulham Council and on the 2 July 2002 Kensington & Chelsea Council consulted the Mayor of London on a proposal to develop the above site for the above uses. That scheme was reported to the Mayor on 28 August 2002 and the Mayor's comments are attached. The scheme has subsequently been revised and this report sets out the changes that have been made. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make on the revised scheme.

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

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

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

Site description

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

Case history

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

7 The reasons for refusal were failure to meet the Council's policies in respect of affordable housing, design, amenity and transport. In particular, the proposed development was considered unacceptable due to its height, massing, siting and relationship to existing development and because of the harm it would cause to local views and in particular views from the river walk. The scheme was also considered to fail the open space policies in that the public open space should relate to the nature conservation area of Chelsea Creek. The proposals were also considered to harm the amenity of the occupiers of Chelsea Harbour in terms of impact on daylight and overlooking by reason of the proximity, height and massing of the scheme, to generate an unacceptable impact on the local highway network; provide insufficient amenity space for the occupiers of dwellings; insufficient affordable housing; and make no provision for the education of children residing in the development.

8 In September 2002 Hammersmith and Fulham Council refused planning permission for *"demolition of buildings ancillary to the Lots Road Power Station and development of all unbuilt land to provide 443 units of residential accommodation (comprising 32 studio units, 135 one bedroom units, 209 two bedroom units, 68 three bedroom units) together with 296 car parking spaces and a restaurant (832sqm), and associated works to Chelsea Creek and Chelsea Basin including the construction of three bridges over the Creek."* The application was refused on grounds of over density, design, including height mass and bulk, inadequate open space provision, harmful impact on the local road network, failure to make provision for the education

of children, inadequate affordable housing provision and encroachment onto the creek reducing flood capacity.

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

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

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

Relevant strategic planning policies

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

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

Details of the revisions to the proposal and analysis of strategic planning issues

Design – tall buildings and views

13 The principle change in the scheme comprises the swapping of the two towers on the creek. The taller 37 storey, 122m tower is now located on the Hammersmith & Fulham side of the creek, and the lower 25 storey 85m high tower is located on the Kensington & Chelsea side. These two towers are well designed and would add positively to the London skyline. They would have a particularly dramatic presence in views along the river from the east and would enhance the setting of the Thames and the adjacent Lots Road Power Station. They would not harm the setting of adjacent conservation areas, nor long views from Brompton Cemetery. The treatment of the base of the towers has been further resolved with level open space at the base of both towers contributing to the permeability and progression of space through the site. The design and location of the towers meet the policies set out in the draft London Plan.

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Design - site layout

The layout of the ground floor blocks has been amended so that a clear line of site is provided through the scheme east to west. The aspiration to achieve a sightline from the creek bridge through the centre of the scheme to the river and St. Johns Church (Battersea) beyond has not been achieved although the progression of spaces and permeability of the site has been greatly enhanced. The re-planning of the scheme has produced a larger open space on the creek opposite the power station, which does deliver a more open development, avoiding the mistakes of the Chelsea Harbour scheme. The development now knits well with the Chelsea Harbour scheme and the retained power station.

Transport and intensification

14 Whilst the overall number of units on the site has decreased the size of the units provided and thus the number of habitable rooms on the site has increased. This has resulted in a small increase in density levels from 520 hr/ha to 554 hr/ha. The increase in unit size can be seen in the affordable housing provision on the site.

	RBK&C Jun-02	Dec-02	H&F Jun-02	Dec-02	Totals Jun-02	Dec-02
Total no. of apartments	422	420	443	397	865	817
Affordable total	146	166	222	216	368	382
% Affordable	35%	40%	50%	54%	43%	47%
RSL						
Studio	-	11	-		-	11
1 Bed	28	30	86	39	114	69
2 Bed	50	53	50	87	100	140
3 Bed	13	33	6	46	19	79
4 Bed		17		14	0	31
Total RSL	91	144	142	186	233	330
Key Worker/Entry Level						
Studio	40	12	32		72	12
1 Bed	7	5	16	30	23	35
2 Bed	8	5	32		40	5
Total Key Worker/Entry Level	55	22	80	30	135	52

15 The provision of a mix of affordable units and in particular family sized units is welcomed. The overall density levels are still considered to be broadly in line with the draft London Plan density matrix (for reasons set out in the original report to the Mayor), and the scheme delivers a high density development within a central London location, which has the potential to deliver both long and short term improvements to transport accessibility to the satisfaction of Transport for London, and which is designed to a high standard in terms of the quality of accommodation provided.

16 The overall level of parking on the site has been reduced from 696 to 667 spaces (including 40 replacement for existing on-street spaces). As with the earlier applications, a £5million package of transport improvements has been put forward to provide the necessary improvements in accessibility. This includes funding for bus services; a contribution towards works at the proposed West London Line station; bus priority measures; and pedestrian/cycle facilities. Residents will be required to pay £200 towards the cost of a Travel Card and through service charges each private residential unit will also pay £115 subsidy towards river boat services. This would provide a total subsidy for river boat services of £50,000 per annum in perpetuity to be paid to a private operator.

17 Since the last application was submitted, London Buses has revised cost and revenue estimates for the proposed Embankment bus service. The estimated annual net deficit is approximately £200,000 per annum greater than previously forecast, taking the total net deficit over the three year sponsorship period to £1.7 million. This increase will require additional funding to be committed through the Section 106 Agreement. The costs of proposed frequency enhancements to the C3 have also increased significantly and it is likely that better value could be achieved if the subsidy previously identified for improvements to the C3 is directed towards alternative bus links between the Lots Road area and Earls Court. This could include a possible new north south bus route that extended beyond Earls Court to White City and Park Royal, providing a greater range of travel opportunities for new residents. TfL is meeting regularly with the applicant's consultants and the borough councils to discuss details of the Section 106 packages. However, it is already clear that there will be a substantial shortfall in funding available to deliver the necessary improvements in public transport accessibility. TfL expect this shortfall to be met by the applicants in full.

Affordable housing

18 The overall level of housing on the site has decreased from 866 units to 817, and the number of affordable units has increased within that total from 368 to 382.

	original scheme		revised scheme	
total units	866		817	
private units	498		435	
affordable units	368	(42%)	382	(47%)

19 The increase in affordable housing on the site is welcomed and moves the provision closer to the draft London Plan target for the boroughs concerned of 50%. This is a significant strategic gain to London housing needs.

Hammersmith & Fulham site

20 The scheme proposes 54% affordable housing (up from 50%) with 47% social rented and 7% intermediate housing in the form of key worker housing. The mix of tenure types is as follows:

	original scheme	revised scheme
total units	444	397
private units	222	181
affordable units	222	216

21 The number of three and two bed units in the scheme has been significantly increased with the majority of accommodation being RSL housing.

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

Kensington & Chelsea site

23 The scheme proposes 40% affordable housing overall (up from 34.5%), comprising 34% social rented and 6% intermediate housing.

	original scheme	revised scheme
total units	422	420
private units	276	254
affordable units	146	166

24 The provision of three and two bed affordable units has been increased as has the proportion of RSL housing within the overall scheme.

25 Kensington & Chelsea Council's Adopted UDP (25 May 2002) identifies that if its affordable housing target is to be met, *"the large sites in the Schedule of Major Development Sites (of which Lots Road is one) should provide a higher proportion (i.e. more than one third) of affordable housing..."* (paragraph 5.5.10a). As a minimum, sites should provide at least a third affordable housing (paragraph 5.5.10c). In terms of units provided the current scheme meets the UDP's minimum requirements (of no less than 33%) and through the provision of 40%

affordable housing moves closer to the higher proportion of affordable housing sought in respect of major sites.

26 Given the decontamination costs associated with this site the provision of 40% affordable housing is not unreasonable. In strategic terms, considering the site as a whole, the delivery of 47% affordable housing comes very close to the targets identifies within the draft London Plan for affordable housing within the two boroughs.

Environmental impact assessment

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

Blue Ribbon Network (draft London Plan 2002)

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

Local planning authority's position

29 Hammersmith & Fulham Council has not confirmed its views on the current planning applications other than that it is likely to consider the scheme at a planning committee in March 2003.

30 Kensington & Chelsea Council still have some concerns over the principle issues, affordable housing, parking and S.106 contributions but are seeking to resolve these over the next couple of months with a possible report to committee towards the end of April.

Views of Transport for London

Transport proposals

31 A package of transport improvements known as the Sustainable & Integrated Transport Strategy (SITS) has been put forward by the applicants to address the impacts of the development. These have been discussed in detail with officers at the boroughs and TfL. Details of the final transport package will be included in a Section 106 Agreement, although it would be appropriate for works at the Lots Road/Cremorne Road junction to be carried out by the applicants under a Section 278 Highways Agreement.

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

• Embankment bus service	£1,000,000
• C3 frequency enhancements and extension to the north of Earls Court	£500,000
• Bus priority measures	£600,000
• Bus stop improvements	£200,000
• Improvements to the bus gate	£50,000

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• Contributions to upgrading West London Line station	£1 000,000
• Cycle path improvements	£410,000
• Pedestrian improvements	£200,000
• Improved access to Chelsea Harbour pier	£200,000
• Green Travel Plan measures	£120,000
• School Travel Plan measures	£120,000
• Environmental cell	£400,000
• Lots Road/Cremorne Road junction	£200,000

33 The costs of transport improvements have been provided by the applicants and reflected bus service tender prices at the beginning of 2002. Further work has now been carried out by London Buses. This demonstrates that there will be a substantial funding shortfall for new and improved bus services. Other costs in the transport package have not been examined in detail but these may also have increased. The applicants will need to demonstrate that all elements of the package can be delivered to provide the necessary transport capacity and accessibility. This may require an increased total contribution towards transport improvements. The issue of adequacy of transport funding will need to be resolved through discussions on the Section 106 Heads of Terms before the applications can be determined. Section 106 funding for transport improvements will need to be made available at the start of development to ensure that service changes are available to the first residents. Some form of index linking will also be required to ensure rising costs in the interim are taken into account.

West London Line

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

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

Bus services

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

Links to Earls Court

37 It is likely that better value for money can be obtained if the subsidy previously identified for frequency enhancements to the C3 is directed towards alternative bus links between the Lots Road area and Earls Court.

Embankment service

38 The proposal for a completely new bus service linking the site to Pimlico and Westminster along the Embankment is supported in principle. Work done to date suggests that this service is likely to meet London Buses' planning and financial criteria. However, a full evaluation of the costs and benefits will be needed once some of the uncertainties are resolved

(333)

surrounding the impact of the proposed congestion charging scheme and the future opening of the West London Line station at Chelsea Harbour. Adequate standing space would need to be identified at both ends of the route. TfL understands that potential stand locations have been identified by the applicant although these would need to be confirmed closer to the start date.

Other bus service proposals

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

40 TfL and London Buses will discuss the proposed bus service enhancements as part of the negotiations to agree the Section 106 Heads of Terms. Flexibility will be required to ensure that service improvements represent the best value for money at the time they are implemented.

Measures to assist buses

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

42 The feasibility of bus lanes along the Embankment would need to be investigated further once the long-term impacts of the Central London Congestion Charging Scheme are better understood. TfL would want flexibility so that funding earmarked for bus priority measures on the Embankment could be diverted into other improvements to bus services if the priority measures are not implemented.

Green Travel Plan

43 A series of measures are proposed including:

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

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

River transport

45 Improved access to Chelsea Harbour pier and better passenger facilities are proposed as part of the transport package. Although the pier is privately owned, these improvements are supported by London River Services. A compulsory subsidy of £115 per private residential unit per annum is proposed to support improved river services. This would amount to a total subsidy of approximately £50,000 per year to be guaranteed in perpetuity. It is understood that in return for the subsidy an operator has expressed interest in providing an additional river bus service between Chelsea Harbour and Westminster Pier during the morning and evening peak hours to complement the existing service to Cadogan and Embankment Piers.

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

Parking

47 TfL welcomes the reduction in parking from the earlier application.

TfL's conclusion

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

49 The Section 106 agreement will need to provide flexibility (to allow funding to be reallocated if necessary) and certainty that the list of transport projects can be delivered. London Buses has already identified a substantial shortfall in funding for bus services and other costs are likely to rise during the planning and development process. Additional funding will need to be provided by the applicants to cover these cost increases and ensure that all elements of the SITS can be delivered in full. Section 106 funding for transport improvements will need to be made available at the start of development to ensure that service changes are available to the first residents. Some form of index linking will also be required to ensure rising costs in the interim are taken into account.

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

51 Overall parking provision is lower than the earlier application. This reduction is welcomed. The approach to parking management should form part of the Green Travel Plan.

Other comments

52 CABE welcome the changes to the scheme which they consider delivers a better progression of space through the site.

53 The Chelsea Harbour Residents Association object to the design, density, amenity and traffic impacts of the scheme. They consider this scheme an over development of the site, contrary to local and strategic plan policy.

Legal considerations

54 There are no legal considerations at this stage.

Financial considerations

55 There are no financial considerations at this stage.

Equal opportunities considerations

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

Conclusion

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

58 Given the proposed improvements to public transport, the density of development proposed for the site is considered to meet the guidelines set out in the draft London Plan. The density of development proposed also allows for the delivery of a significant level of affordable and private housing on the site. The design of the scheme is of a high quality with the towers contributing positively to the London skyline and the setting of the Thames and the Lots Road Power Station. Accessibility into and through the site and the creek is a significant urban design gain. The legibility and permeability of the scheme has been further enhanced by amendments to the layout and the overall the design quality is of a high quality.

59 The increased levels of affordable housing provided on the site meet the requirements of the draft London Plan. Overall, the development is in the interest of good strategic planning in London.

for further information, contact Planning Decisions Unit:

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Symonds

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Mr Richard Case
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London
W8 7NX

Our ref: ML/3T49673

27 February 2003

EX	HDC	TP	CAC	AD	CLU	AO
DIR						AK
R.B.		13 MAR 2003		PLANNING		
K.C.						
N	C	SW	SE	APP	IC	REC
			ARB	FPLN	DES	FEE

Dear Richard

Lots Road Power Station

With reference your letter of 29th January 2003 we are currently preparing the supplementary transport information as part of an addendum to the Environmental Statement. We have also addressed each of points raised in your letter below:

Sensitivity tests

As requested we will undertake sensitivity tests using the higher trip rates supplied by yourselves'. This analysis will be submitted as part of the Addendum to the Environmental Statement.

Impact on parking

Again this issue will be covered in the Addendum to the Environmental Statement.

West London line

As discussed at the meeting of 23rd January TfL are willing to accept passive provision towards an 8 car station on the West London Line, meaning that the platform would not be extended to accommodate an 8 car train at the moment, but provision would be made to enable this change if and when it is required. In this situation the remainder of the contribution would be used to fund other alternative and appropriate measures agreed between all parties.

Environmental cell

Given the Boroughs slightly widened interpretation of the Environment Cell we accept your suggestion to rebrand this as a Streetscape Improvement Zone. We also confirm that it was always our intention that the current proposals are for indicative purposes and agree that the

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27 February 2003

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details of these measures are most appropriately dealt with once the planning application is determined.

Lots Road

As indicated in your letter the detailed design required to allow buses to use the southern section of Lots Road will form part of the Streetscape Improvements Zone. These measures will be agreed with London buses and yourselves and would define the number of car parking spaces which need to be relocated as public spaces into the basement of the Lots Road development. We have ensured that adequate provision is available within the basement to accommodate both these spaces and car-parking spaces for a car pool.

Bus services

Within the section 106 agreement the description of the bus services will address the broad objectives as requested in the letter.

T L R N and Cremorne Road junction

We are pleased that both the traffic management principles and the new junction are acceptable to the Borough. As requested we will re-run the LINSIG analysis as part of the sensitivity tests and include this in the addendum to the Environmental Statement.

Bus priority

Preliminary proposals for bus priority are given within the Transport Assessment. These include some short lengths of new bus lane. The final details need to be agreed with TfL and depend partly on the impact of congestion charging and the proposed cycle lane on the Thames Embankment.

Detailed geometry

We confirm that the detailed issues highlighted regarding the operation of the site will be addressed in the Addendum to the Environmental Statement.

Phasing

The section 106 agreement includes initial proposals for the phasing of the transport improvements. It also identifies phasing for the funding.

Construction

A separate report is currently being prepared on construction traffic and use of the river. This will be included within the Addendum to the Environmental Statement.

27 February 2003

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Community Car Club

As requested we will contact Chas Ball of Smart Moves to discuss the arrangements for the car pool and whether the vehicles can be part of the Borough scheme.

Travel information

It is likely that the travel information office will be operated by our own transport manager. However provision will be made to allow Kensington & Chelsea Community transport to operate the proposed community buses.

The Addendum to the Environmental Statement will be issued shortly and if there are any further issues you would like to discuss please do not hesitate to contact us.

Yours sincerely



Michael Lewin

Cc John Thorne, RBKC planning
Jim Pool, Montagu Evans

■ City of London
■ Glasgow
■ Edinburgh

AMA/see/PD5824

03 march 2003

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

FAO: John Thorne Esq.

Dear Sirs

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 1999
LOTS ROAD POWER STATION DEVELOPMENT
AMENDMENT TO PLANNING APPLICATION REF: 02/01324

In response to the request by your planning department, please find enclosed additional information in support of the above current planning application submitted to your offices on 7 June 2002.

The enclosed information comprises a series of revised drawings and an addendum to the Environmental Statement that was submitted to your offices as part of alterations to the current scheme, under cover of letter dated 12 December 2002.

Revised Drawings

The enclosed drawings have been produced in response to the ongoing discussions with your planning officers and the Environment Agency. The amendments to the drawings are as follows:

- In response to comments made by the Environment Agency, the creek flood defence wall has been redesigned in relation to the existing line of the creek.
- A number of trees positioned between the creek and the proposed power station plaza have been repositioned further away from the creek wall.
- Minor amendments have been made to the design of the landing point of the easterly creek bridge. The bridge landing now fans out onto the proposed decking adjoining block KC1.
- Drawing, reference: LRTW4/PA/08-104 Rev A, has been correctly labelled.

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
J J Cohu
R P Woodman
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
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M R P Gibbs
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A P Richardson
Louise Younger
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P K Young
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L Ewan
P J Wise
A Kearey
I D MacLeod
Diane Rider
P A Dempsey
J Drew

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

CONSULTANTS
D H Taylor
N J R Braybrook

R F Dumbleton
J P A Forsyth
J B Hermiston
J C Pagella
G M Skelcey

SECRETARY
S M Wilson



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EVANS**

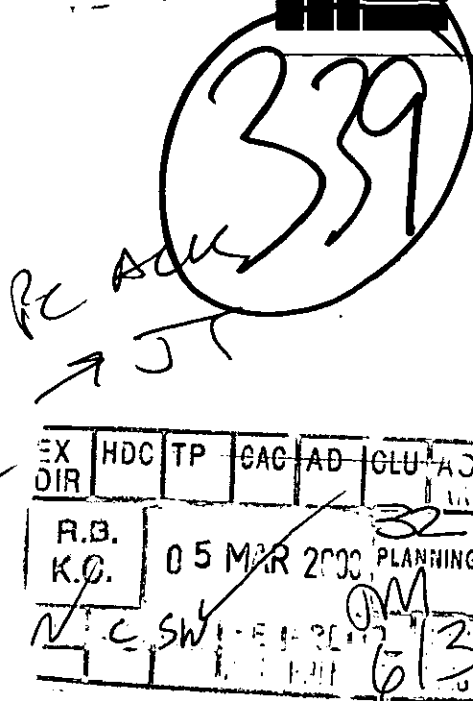
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44-48 Dover Street
London W1S 4AZ

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Fax: 020 7312 7548

www.montagu-evans.co.uk





In addition to these substitute drawings, we also enclose three new drawings produced in response to your letter dated 19 September 2002.

The first drawing provides sections through the industrial units within block KC3. The second drawing provides the typical plan view of the proposed flats within the scheme to distinguish between wall and window in each unit. The last drawing relates to the proposed vehicle servicing strategy incorporating the movement of large and small service vehicles, emergency and removal vehicles and taxis. The drawing gives the proposed circulation of these various vehicles throughout the development within the Royal Borough.

The enclosed information also comprises an addendum to the existing environmental statement which provides the following information:

1. Air Quality Testing

In response to your letters dated 12 December 2002 and 23 January 2003, the addendum provides an amalgamated air quality report which includes additional modelling on the construction phase traffic. The report is based on the assumption that 50% of construction traffic is by road.

The report finds no significant increase in areas of air quality objective exceedances.

2. Transport Sensitivity Testing

In response to your letter dated 29 January 2003, transport sensitivity testing has been conducted using the "work case" scenario suggested by your planning officers. The testing resulted in no unacceptable or adverse impact on the road network.

The additional testing confirms the robustness of the transport proposals and reconfirms the conclusions within the Environmental Statement.

The addendum also addresses additional requests for clarification of transport related issues as set out in your letter dated 29 January 2003.

3. River Transport Study

In response to your letters dated 11 and 12 January 2003, the addendum also provides further information on the use of river transport during the construction period. The study, produced by Taylor Woodrow Construction, identifies how materials will be transported on and off the site, resulting in a reduction in the number of construction road vehicles needed for the development by 50%.

In light of this additional information being submitted in support of the original Environmental Statement, it is considered that the residual environmental impact remains substantially beneficial.

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03 March 2003
Page 3

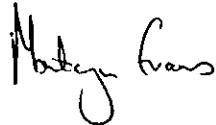
We have notified all strategic consultees as well key non-statutory consultees ~~in writing~~ and provided them with a copy of the addendum. In accordance with the Regulations they have been informed that they must respond to the Royal Borough within 21 days of service of the notice.

Accordingly, please find enclosed the following information:

1. 15 copies of the Addendum to the Environmental Statement;
2. 15 copies of the revised drawings (10 x size A3, 5 x size A0) as listed on the enclosed drawings schedule dated 28 February 2003;
3. Copies of the covering letter distributed to all statutory and non-statutory consultees.

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

Yours faithfully



MONTAGU EVANS

Enc.

■ City of London
■ Glasgow
■ Edinburgh



**MONTAGU
EVANS**

AMA/see/PD5824

03 March 2003

Royal Borough of Kensington & Chelsea
Planning Department
Town Hall
Hornton Street
London
W8 7NX
FAO: John Thorne Esq.

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PC ACK
→ JC

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PF021324/C

Dear Sirs

**LOTS ROAD POWER STATION DEVELOPMENT
PLANNING APPLICATION REFERENCE: 02/01324**

In response to your letter of 19 September 2002 and the support of our letter dated 13 January 2003, please find enclosed for the purposes of clarification additional information in support of the above current planning application.

Enclosed are 3 large scale illustrative colour drawings of the Block KC1, the 25 storey tower.

The first drawing provides details of the tower's typical elevation. The drawing demonstrates our client's intention to provide floor to ceiling glazing units between the longitudinal steel frames. The drawing shows the tower's detail in elevational, plan and section form.

The other two drawings provide contextual information concerning the tower's relationship with the rest of the proposed development and the existing surrounding built landscape.

We trust this provides you with the additional information you requested. However, should you require any further information or have any queries regarding the enclosed please do not hesitate to contact Jim Pool of this office.

Yours faithfully

Montagu Evans

MONTAGU EVANS

Enc.

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

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SECRETARY
S M Wilson

CONSULTANTS
D H Taylor
N J R Braybrook





**MONTAGU
EVANS**

AMA/jb/PD5824

10 March 2003

The Environment Agency
Apollo House
2 Bishops Square Business Park
St Albans
Hatford
AL10 9EX
FAO: D. Simmons

CHARTERED SURVEYORS

Premier House
44-48 Dover Street
London W1S 4AZ

Tel: 020 7493 4002

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www.montagu-evans.co.uk

Dear Sir

LOTS ROAD POWER STATION DEVELOPMENT

In response to the ongoing discussions between Members of your office and the applicant, please find enclosed additional information with regards to the above development.

Enclosed is a set of revised planning application drawings submitted to the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea on 3rd March 2003. The drawings propose a series of minor amendments to the scheme currently being considered by the Boroughs.

The drawings show the position of the Creek flood defence wall that is consistent with that previously submitted to you by Waterman Environmental and allows for potential future raising, if the need arises.

In addition, the enclosed drawings also show the proposed trees located between the Power Station Plaza and the Creek relocated further from the Creek Wall to provide clear access to the flood defences. Access to and around the foot of each of the towers is also clarified.

We trust this is sufficient information with which to consider the amendments to the current planning application. Should you have any comments on these amendments please write to:

Paul Entwistle,
Planning Department,
London Borough of Hammersmith and Fulham,
Town Hall Annex,
King Street, London W6 9JU; and

John Thorne,
Planning Department,
Royal Borough of Kensington and Chelsea

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PARTNERS

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J P A Forsyth
J B Hermiston
J C Pagella
G M Skelcey

SECRETARY
S M Wilson



Town Hall, Hornton Street
London W8 7NX

Yours faithfully



MONTAGU EVANS

Encs.

cc: Antonia Scarr
Colin Woodward
Julie Baxter
Ian Blackburn
John Marsh (without plans)
Paul Entwistle LBHF (without plans)
~~John Thorne~~ - RBKC (without plans)

343

10 March 2003
Page 2

Date 26 March 2003

To
Ms Pam Sedgewick
Investment Manager
The Housing Corporation
Waverley Street
7-12 Noel Street.
London.
W1F 8BA

Your Ref

Our Ref

Circadian
4 Dunraven Street
London W1K 7FB

Telephone: 020 7488 0555
Facsimile: 020 7264 5308
E-mail: info@circadian-uk.com
www.circadian-uk.com

Circadian Ltd and
Circadian (CH) Ltd are
joint venture companies
between Taylor Woodrow
Capital Developments and
Hutchison Whampoa
Properties Ltd.

Registered Office:
Venture House
42 - 54 London Road
Staines
Middlesex TW18 4HF
England

Registered Nos.
3857131
4005637

Hutchison Whampoa
Property

The property group of
Hutchison Whampoa Limited



Taylor Woodrow



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Dear Pam

LOTS ROAD POWER STATION AND LAND AT THAMES AVENUE, LONDON, SW10

You are no doubt aware of the above large development site located in both the London Borough of Hammersmith & Fulham and the Royal Borough of Kensington & Chelsea, which is progressing rapidly towards a revised planning consent. It already has a detailed consent on the land in LBHF without the need for affordable housing. In order for you to programme matters with greater certainty, I would appreciate an indicative response from you that confirms that in principle The Housing Corporation would be prepared to be involved with this exciting scheme.

The developer, Circadian is a joint venture between Taylor Woodrow Capital Developments and Hutchison Whampoa. Taylor Woodrow are the development managers and I have been working with the London team on this project for sometime now.

I see The Housing Corporation's involvement as being identical to that at GUV. Namely that we agree many of the parameters with the local authorities, (mix, tenure, rent levels, vision, management, nominations etc) and then using Best Value parameters choose a lead RSL. This of course will require SHG from yourselves.

In order to give you comfort, I can confirm that while we would have liked to have had the same conditions as at Imperial Wharf, but we have been pragmatic in our approach on costs values and funding. To that end I have advised my colleagues that we should be able to deliver the scheme on the same basis of funding as GUV.

As you know very little about the scheme, please find attached the following:-

- A copy of our exhibition document describing the scheme
- Mix of the affordable proposed in both boroughs including floor areas and layout plans
- An indication of the development programme for delivery of affordable units.

Continued



Our aim is to have a sustainable inclusive neighbourhood that meets many of the Housing Corporation's key objectives and Best Value. I believe this is another step in achieving a Partnering Ethos with all the stakeholders and in meeting both The Mayor's and Mr Prescott's visions. I trust you agree.

Should you require any further information, please let me know. I look forward to hearing from you soon.

Yours sincerely,


PP TERRY FULLER

Direct dial 07816518680
Fax 01223 837863
terry.fuller@uk.taylorwoodrow.com

encl.

cc. Paul Entwistle – Planning Officer, LBHF
Elaine Elkington – Head of Housing, LBHF
Ian Ruegg – Housing Officer, LBHF
John Thorne – Planning Officer, RBKC
Stan Logan – Housing Officer, RBKC
Jim Pool – Montagu Evans

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APPROVED						

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



**KENSINGTON
AND CHELSEA**

Switchboard: 020-7937-3464

Direct Line: 020-7361-2467

Extension: 2467

Facsimile: 020-7361-3463

Date: 27 March 2003

Office of the Deputy Prime Minister,
Temple Quay House,
2 The Square,
Temple Quay,
Bristol BS1 6PN

My Ref: DPS/DCSW/PP/02/01324/JT

Please ask for: John Thorne

Dear Sir/Madam,

Town and Country Planning (Environmental Impact Assessment) Regulations 1999

In accordance with the above regulations, I enclose three copies of the further information supplied to this authority in respect of:

Conversion of Power Station to provide a mix of residential, retail, office, business and restaurant uses, together with erection of 25 storey residential tower with ground floor gym, a 3-8 storey building incorporating commercial and residential uses, a 7 storey residential building, associated parking, servicing and landscaping, and works to Chelsea Creek, including three pedestrian bridges.

At: LOTS ROAD POWER STATION AND CHELSEA CREEK, LONDON, SW10

Application made on 07/06/2002 by Circadian Ltd. to Royal Borough of Kensington and Chelsea, The Town Hall, Hornton Street, London W7 7NX.

Yours faithfully

M. J. FRENCH
Executive Director, Planning and Conservation



INVESTOR IN PEOPLE

LOCAL PRESS

CRIPAY

28th March 2003

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

347

FURTHER INFORMATION IN RESPECT OF:

CONVERSION OF POWER STATION TO PROVIDE A MIX OF RESIDENTIAL, RETAIL, OFFICE, BUSINESS AND RESTAURANT USES, TOGETHER WITH ERECTION OF 25 STOREY RESIDENTIAL TOWER WITH GROUND FLOOR GYM, A 3-8 STOREY BUILDING INCORPORATING COMMERCIAL AND RESIDENTIAL USES, A 7 STOREY RESIDENTIAL BUILDING, ASSOCIATED PARKING, SERVICING AND LANDSCAPING, AND WORKS TO CHELSEA CREEK, INCLUDING THREE PEDESTRIAN BRIDGES.

AT LOTS ROAD POWER STATION AND CHELSEA CREEK, LONDON, SW10

APPLICATION MADE ON 07/06/2002 BY CIRCADIAN LTD. TO KENSINGTON AND CHELSEA R.B.C., THE TOWN HALL, HORNTON STREET, LONDON, W8 7NX.

FURTHER INFORMATION IS AVAILABLE IN RELATION TO AN ENVIRONMENTAL STATEMENT, A COPY OF WHICH MAY BE INSPECTED AT THE CHELSEA REFERENCE LIBRARY, CHELSEA OLD TOWN HALL, KING'S ROAD, LONDON, SW3, UNTIL 18/04/2003. COPIES MAY ALSO BE AVAILABLE FOR A FEE OF £30 AT THE PLANNING INFORMATION OFFICE, THE TOWN HALL, HORNTON STREET, LONDON, W8 7NX WHILE STOCKS LAST.

ANYONE WHO WISHES TO MAKE REPRESENTATIONS ABOUT THE FURTHER INFORMATION SHOULD WRITE TO THE EXECUTIVE DIRECTOR, PLANNING AND CONSERVATION, AT THE TOWN HALL BEFORE 18/04/2003.



Waterman Environmental
Consulting Engineers & Scientists

FACSIMILE TRANSMISSION

348
JT

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

TO: Ian Blackburn **FROM:** John Marsh
COMPANY: Environment Agency **REF:** En1493
FAX NO: 020 8305 4090 **PAGES:** 3 (inc. header)
Jonathan Trout (Circadian) 7264 5308
Jim Pool (ME) 7312 7548
CC: Deborah Simons (EA) 01707632515 **DATE:** 31 March 2003
John Thorne RBKC) 7361 2467
Paul Entwistle (LBHF) 8753 3423
SUBJECT: Lots Road Planning Application

MESSAGE/COMMENTS:

Ian, further to our telephone conversation and with reference to the bullet points in the previous e-mail forwarded to me by Deborah Simons, I confirm the following points as discussed.

Point 1 and 2, we are pleased that you are able to condition these points and in due course we would be pleased to discuss and agree the calculations of flood storage capacity and the method of presenting these calculations. We confirm that the basis of these calculations would be as previously agreed. For your information we are currently undergoing a programme of detailed monitoring of the creek topography to record the changes that take place following the power station closure. The early indications are that the creek is indeed experiencing siltation.

Point 3, as discussed at the point where the first creek bridge lands, on the north side of the creek, close to KC1, vehicles would be able to traverse unimpeded across the foot of the bridge and this would be graded from the general site levels at such a gradient to permit wheel chair access (as this bridge connects the Thames Path). This provides an unrestricted access of some 6.25m between the level 2 overhang and the main bridge structure. I enclose an annotated sketch illustrating this.

Point 4, TFP north and south elevations of HF2 drawing 08 - 107. We note your comment and we will be providing an amended version of TFP drawing LRTW-4/PA-08/107-A to illustrate this.

Point 5, I note your comment however, we would maintain that the river path is a minimum of 5m wide at all points. As discussed on the phone the only point where there is any possible restriction less than this is at the lighting columns that coincide with the line of the ventilation columns. We acknowledge that these can be staggered and their final position agreed as a planning condition. It is also possible that they can be positioned within the line of the safety barrier and therefore not narrow the path at all. I enclose a sketch illustrating the path width along the Thames.

I trust that this is acceptable, however, should there be any outstanding issues that need to be addressed please do not hesitate to contact me.

John Marsh

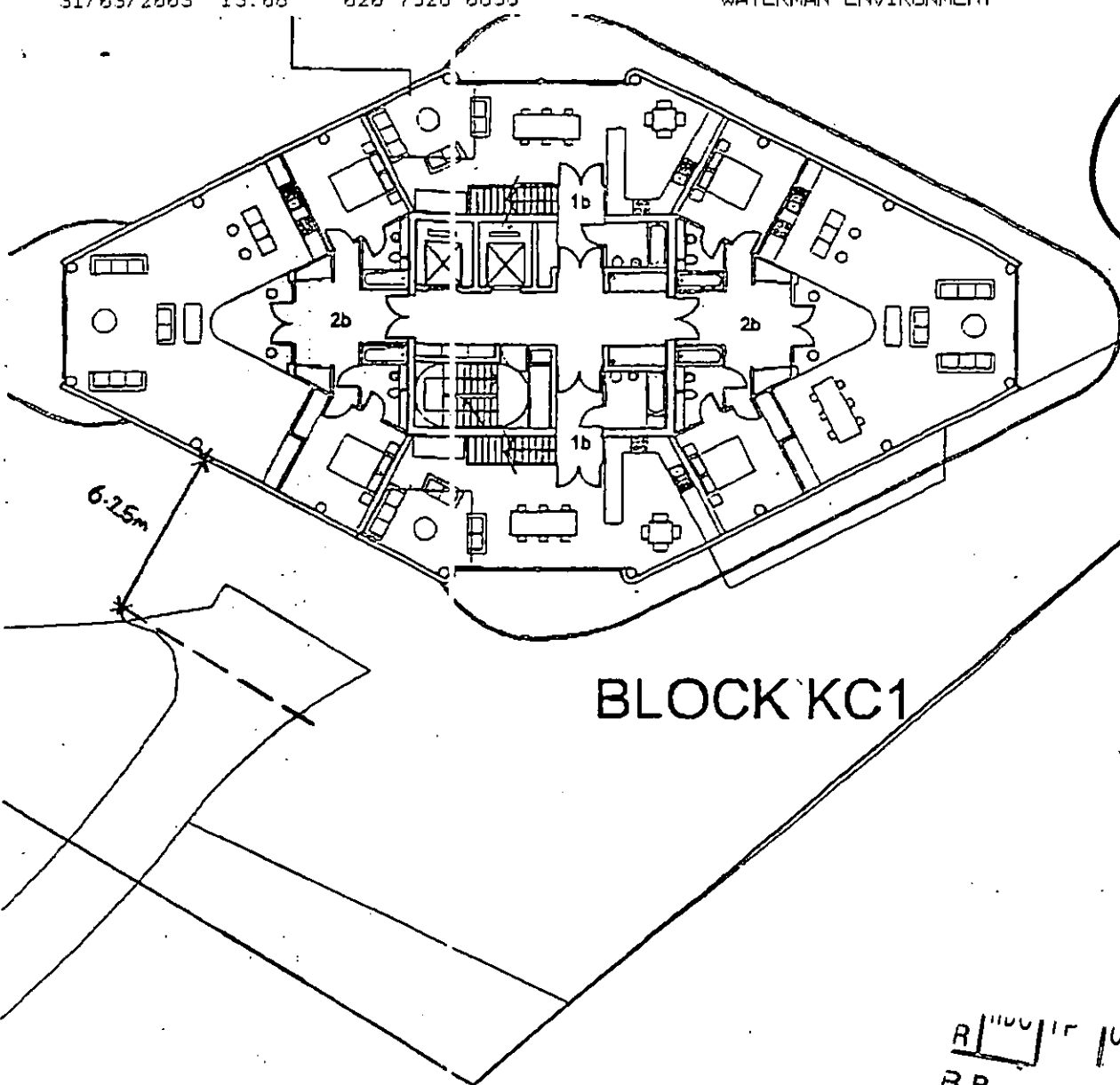
John Marsh

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DCSE

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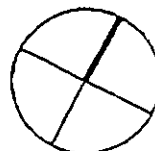
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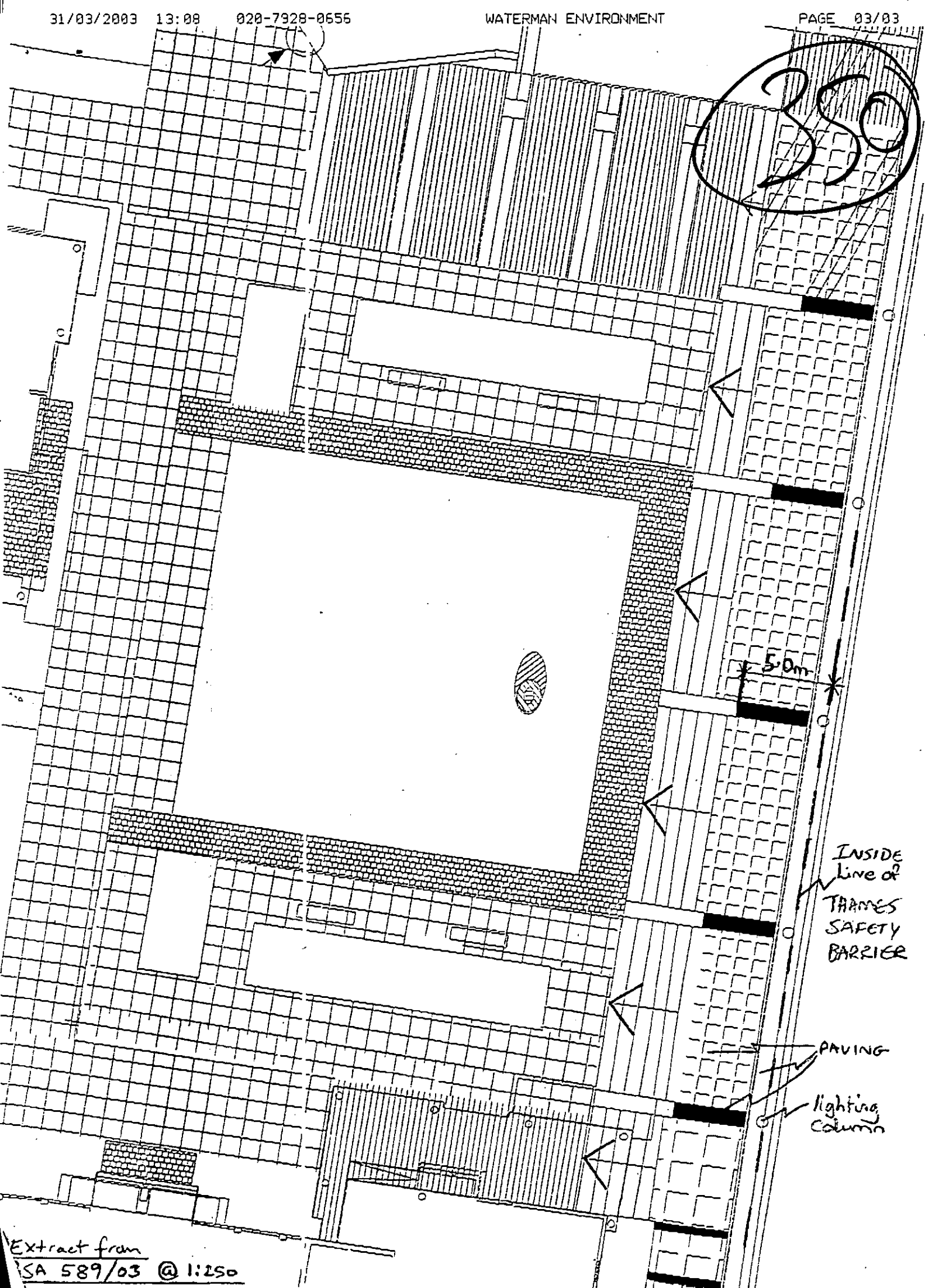
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&
PARTNERS



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Waterman Environmental

Consulting Engineers & Scientists

351

Our ref: G/EN1493/405JM/JMcN
Your ref:

Direct fax: 020 7928 0656
Direct email: j.r.marsh@waterman-group.co.uk

Date: 8 April 2003

Deborah Simons
Environment Agency
Apollo House
2 Bishops Square Business Park
St Albans Road West
Hatfield
AL10 9EX

Dear Deborah

Re: Lots Road Response to the Boroughs

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
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Further to the receipt of your e-mail enclosing your letter to the boroughs (reference NE/2002/008039) I would comment as follows:

Your reason for objection that relates to the proximity of proposed building HF3A to the creek edge makes reference to adverse effects on '.... the ecological value and character of the watercourse, and restrict necessary access to the watercourse for the Agency to carry out its functions.'

In our letters of 14 and 25 February 2003, addressed to the Environment Agency and copied to the boroughs planning officers, we provided details of how the overall site proposals improve access to the creek and a drawing illustrating how access to the river wall at this location could be gained was supplied. We would note that this situation is no different from many other locations on the tidal Thames and does not present any technical difficulties that cannot be overcome with respect to the maintenance or integrity of the flood defence wall. Indeed, for the majority of its length, the existing power station building itself immediately abuts the creek, with no landward access for some 100m.

In addition to access from the landward side, access to the creek, the foreshore and the creek wall at this location can be gained from the creek. This was described in Section 10 of Appendix E of the Environment Statement, which concluded that access to the creek by a barge with a tracked excavator on it would be possible to all of the creek frontage of the site.

The proposed structural design philosophy for the creek wall remodelling was presented in Section 8.1 of Appendix E of the Environment Statement. The remodelled creek wall will be independent of the new building structures to the rear; it will be designed in such a manner to enable future raising without reducing the tidal flood storage capacity and will be designed to have a minimum life expectancy of 60 years, commensurate with the development structures.

We would dispute that the proximity of the corner of the proposed block HF3A adversely affects the character of the creek. In our letter of 14 February 2003 addressed to the Environment Agency and copied to the boroughs planning officers, it was noted that currently at the site, access and in particular vehicular access, to the landward side of the flood defence structure is restricted along approximately 80m of the south side of the creek frontage as a result of the presence of the oil storage building and the high pressure gas compound. These visually unappealing buildings that are currently immediately adjacent to the creek will be removed and replaced by high quality architecture set in a significantly improved landscaping scheme.

Versailles Court 3 Paris Garden London SE1 8ND

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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



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We would dispute that the proximity of the corner of the proposed block HF3A adversely affects the ecology of the creek compared with the current condition and would welcome your justification of this statement.

On this basis we consider the provision of access to the flood defences will not prejudice flood defence interests and at this location suitable access will be provided for the Environment Agency to carry out its functions. Furthermore, we consider that the proposals will not adversely affect the character or ecology of the creek.

I trust that this is acceptable.

Yours sincerely

John Marsh
For and on behalf of Waterman Environmental

cc	Jonathan Trout	Circadian
	Ian Blackburn	Environment Agency
	Antonia Scarr	Environment Agency
	Julie Baxter	Environment Agency
	Liz Jones	Environment Agency
	Colin Woodward	Environment Agency
	Paul Entwistle	London Borough of Hammersmith and Fulham
	John Thorne	Royal Borough of Kensington and Chelsea

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						FEES

JT.

- City of London
- Glasgow
- Edinburgh



**MONTAGU
EVANS**

JWP/jb/PD.5824

09 April 2003

London Borough of Hammersmith & Fulham
Department of Planning
The Town Hall Extension
King Street
London W6 9JU

FAO: Paul Entwistle Esq

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CHARTERED SURVEYORS

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R.B. K.C.		10 APR 2003			PLANNING	
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			ARB	FPLN	DES	FEES

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Dear Sirs

LOTS ROAD POWER STATION – OBJECTION FROM LONDON HELIPORT

Your officers brought to our attention that the London Heliport have chosen to object to our current planning application in the London Borough of Hammersmith and Fulham. As agreed, we took separate advice from aviation consultants, Donald Butler Associates Ltd, and enclose a copy of their report. You will note that their opinion is that the helicopter operations will be safely continued at the London Heliport when the proposed development is completed. They have also contacted seven parties other than London Heliport, with specific interests in helicopter movement, ranging from the Director of Airspace Policy at the Civil Aviation Authority to commercial helicopter pilots, who have all confirmed that the proposed development will not prejudice the safe operation of helicopters at London Heliport.

If you would like to discuss this matter in more detail please contact Jim Pool of this office.

Yours faithfully

Montagu Evans

MONTAGU EVANS

Enc.

Cc: John Thorne – Royal Borough of Kensington and Chelsea ✓

PARTNERS

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C A Riding
M J Kerr
S L Thomas
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A C W Rowbotham
P T H Lowrie

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R P Posner
P B Grant
H A Rutherford
C M M Whyte
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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
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G H J McGonigal

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Donald Butler Associates Limited

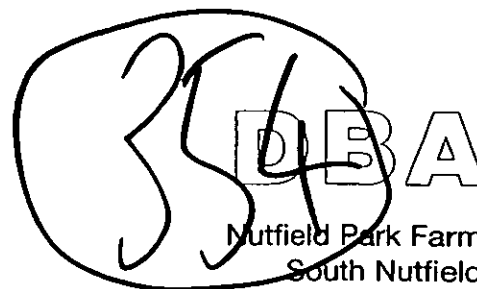
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Aviation Consultants

D J R Butler BSc(Eng)Hons CEng ACGI DIC MICE
Director

Your Ref

Our Ref

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Introduction:

Donald Butler Associates Limited has been established for over 30 years and provides specialist aviation consultancy services for airport and heliport design and operation. The firm works closely with the Civil Aviation Authority (CAA), the Federal Aviation Administration (FAA in USA) and the International Civil Aviation Organisation (ICAO) to achieve and improve safety standards.

A career resume of Donald Butler is appended.

Lots Road Power Station and land at Thames Avenue Development London Heliport Operations.

1. We have been instructed by Montagu Evans, Chartered Surveyors, to advise on the possible effect of the proposed development on flying operations at the London Heliport, Battersea.
2. It is our opinion that helicopter operations will be safely continued at the London Heliport when the proposed development is completed.
3. The proposed development of the two residential tower blocks, known as:

KC1 105.75m AOD (347ft) to top of mast

HF1 144.60m AOD (475ft) to top of mast

would constitute additional obstacles within the London Westland (Heliport) Aerodrome Traffic Zone (ATZ) which is contained within a circle radius 2 nautical miles centred on the heliport and a height of 2000 feet above the heliport level.

The heliport also lies within the London Control Zone (CTR) which extends from ground level up to an altitude of 2500 feet. East of the Heliport ATZ is the London City Control Zone which also extends to an altitude of 2500 feet.

4. The London Heliport have lodged an objection on the basis that the development falls within the ATZ and could be considered as an additional obstacle. What we have to assess is whether or not the proposed tower blocks would be detrimental to the continued safe operations of the London Heliport.
5. Safe aircraft operating standards and procedures are promulgated by the Civil Aviation Authority (CAA) and the National Air Traffic Service (NATS).

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6. Helicopter operations within the London area are controlled by air traffic controllers working the London and London City controlled airspace and are conducted under Special Visual Flight Rules (SVFR).
Safe flying procedures are established by the CAA and professional helicopter operators based on factors which include helicopter performance characteristics, airspace and obstacle constraints, weather limitations which in the case of London Heliport require the visibility to be not less than 1km to ensure that pilots can see where they are going, i.e. not in cloud and in sight of the ground, and the use of preferred safety routings such as following the River Thames.
To the west of the heliport (towards London Heathrow Airport) helicopter operations are limited to a maximum altitude of 1000 feet and to the east of the heliport (towards London City Airport) to a maximum altitude of 1500 feet.
7. The normal circuit height for helicopters using the London Heliport is 1000 feet with approaches and departures along the River Thames either downstream (north) towards Battersea and Chelsea Bridges or upstream (south) towards Wandsworth and Putney Bridges, depending on the wind velocity. Adequate clearance between arriving and departing helicopters and the adjacent tower blocks can be maintained.
8. Multi-engined helicopters are permitted greater flexibility of routing compared with single engined helicopters because the failure of one engine would still enable the helicopter to safely land using the remaining engine(s).
9. The proposed tower blocks would be conspicuous and aeronautical obstacle lights would be installed to comply with CAA safety requirements. Any airport or heliport would prefer to be sited in an obstacle free area, but high rise developments, particularly in major cities, are common throughout the world and approved operating procedures recognise the particular obstacle environment.
10. If planning permission is granted for the proposed development, the CAA would update the relevant aeronautical information to advise pilots and operators of the new buildings including the height of any craneage to be used during the construction period. This action by the CAA would maintain the safety of helicopter operations at London Heliport.

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11. As part of this assessment we have had discussions with the following:

- a) Steve Tierney, General Manager, London Heliport
- b) Dave Cutler, Directorate of Airspace Policy, CAA
- c) Colin Cragg, BAA Group Airspace Planning (NATS)
- d) Gordon Bradley, Aerodrome Licensing Policy (Rotary Wing) CAA
- e) Captain Peter Abbott, London Helicopter Centres
- f) Captain Alan Boswell, ex training captain for Bristow Helicopters and now free lance commercial helicopter pilot.
- g) Philip Amadeus, Managing Director, Rotomotion
- h) Philip Wright, Commercial helicopter pilot

12. With the exception of Steve Tierney, GM London Heliport, who has objected to the Lots Road development proposals, the above contacts have confirmed, in their opinion, that the proposed development would not prejudice the safe operation of helicopters at the London Heliport.

Donald Butler

DONALD BUTLER ASSOCIATES LIMITED.
Aviation Consultants, Redhill, Surrey RH1 5PA
DBA/1761/3April03

Career Resume.

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Name: Donald Butler.

Qualifications:

- **BSc (Eng) Hons** in civil engineering, Imperial College
- **ACGI** Diploma of Associate of the City & Guilds of London Institution for civil engineering.
- **DIC** Diploma of Imperial College for post graduate work in civil engineering.
- **MICE** Member of the Institution of Civil Engineers.
- **CEng** Chartered Engineer.

Director of Donald Butler Associates Limited, (DBA) Consulting Civil Engineers and Aviation Consultants.

Mr. Butler established the firm in 1971 following extensive experience on civil engineering projects with contractors Taylor Woodrow Construction and George Wimpey & Co.

Experience:

- Involved in a wide range of construction projects in building and civil engineering, from feasibility study and planning stages through design and construction management to final handover.
- Concrete and rock filled dams, sea defences, harbour works, jetty for the oil industry, power station, railway engineering workshops, highways and airports.
- Airport and heliport design, construction and operation, including safeguarding.
- Aircraft performance and operation including approach and departure procedures.
- Work with Civil Aviation Authority and Federal Aviation Administration in connection with safety of operations including aircraft runway over-runs.
- Town Planning and Government Inquiries, presentation of evidence.
- Arbitration of disputes.

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- DBA was responsible for the conceptual design of London City Airport working closely with Mowlem, Brymon, LDDC and the CAA to develop this unique airport, and for the detailed design and supervision of the civil engineering works. DBA presented aviation and construction evidence to the successful 17 week public inquiry.
- DBA has been involved in studies and development works on numerous aerodromes in the UK and abroad.

Clients Include:

Barclays Bank	European Helicopters
Belfast City Airport	Federal Aviation Administration
Bristow Helicopters	Lloyds Bank
British Airways	London City Airport
Brymon Airways	London Docklands Dev.Corp.
Canary Wharf	National Westminster Bank
Dept. of the Environment	National Trust
(DETR/DTLR/DoT)	Royal Mail
Chevron Petroleum	Shell Oil
Civil Aviation Authority	United Biscuits
English China Clays	Westland Helicopters
Esso Petroleum	

DBA provides specialist aviation input to major civil engineering consultants and contractors in the UK and abroad as well as to Government and Local Authorities.

Papers and Presentations:

Numerous papers, lectures and presentations to various organisations including the Royal Aeronautical Society, the Institution of Civil Engineers, the Institution of Highways and Transportation, and Government Committees.

- Co-author of paper to the Institution of Civil Engineers on London City Airport for which he was awarded the Parkman Medal.

Flying:

Trained as a pilot with the RAFVR, has a private pilots licence and operates an aircraft for business purposes.

DONALD BUTLER ASSOCIATES LIMITED.
CV/DB/03