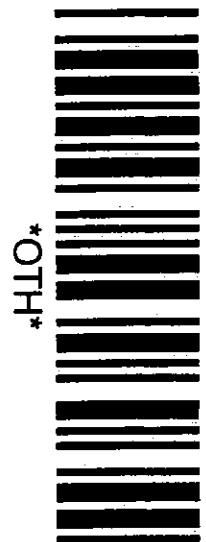


**ROYAL BOROUGH
OF
KENSINGTON & CHELSEA**

DOCUMENT SEPARATOR

DOCUMENT TYPE:

OTHER



OTH

THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

CONSERVATION AND DESIGN OBSERVATIONS

Lots Road Power Station Site, App. No. PP/01/1627

To DC Officer: J W Thorne
Area: SW. Code: N
From: N. Corbett

Date: 18.01.02

The layout and urban form of development

Having considered the further submissions and made a site visit, it is clear that the proposed tall buildings are dictating the layout of the master plan, especially for the RBKC part of the site. The positioning of the towers, their orientation, profile, and detailed design, are all being driven by the desire to make a dramatic impact on the strategic river views. The layout of other new buildings, and the disposition of open spaces, are dependent upon, and appear to be compromised by, the positioning of the towers.

The general layout and urban form of the new development is a critical issue and design work needs to be focused on this area. There needs to be greater appreciation of how the spaces will be integrated, physically and visually. The layout of development and the disposition of public spaces needs to be considered as a central theme, it is a fundamental principal that has not been discussed with the applicants. It would be more helpful if at least two options were to be developed, one with the tall buildings and one without. Alternative schemes should have been developed as part of the environmental impact assessment, especially an option that included high density without high-rise.

Tall buildings

The river frontage of the RBKC site is one of the most important in London. This is not least because of the mile long vista to Vauxhall, with the resulting magnificent views. If the proposed tall building were to be allowed here, it would close that view and would probably be one of London's most visually prominent (or dominant) landmarks. The open river, sky, and the slender chimneys of the power station currently define the area. There are other towers randomly located in the vicinity, but it is difficult to say they form a meaningful relationship with each other. To a significant extent, the existing power station already serves as an appropriate landmark, and we need to ask ourselves if this is the right location for an even greater landmark. I suggest it is not; the site is not a new area of London-wide significance, like Docklands, it is one small part of Chelsea.

It is a little alarming to see that the design of the towers is still being fundamentally developed. The new EH/Cabe Guidance on Tall Buildings states that proposals should be "fully worked up" and "of the highest design quality." The most recent proposal is in terracotta instead of steel, and the area of glass has been reduced because the

architects need to reduce the potential heat gain. It would be more convincing if these issues had been resolved prior to submission; not least so the public could comment on the actual scheme being proposed.

Important though the strategic river views are, we clearly need to consider the other effects of the proposed development. A key consideration is the appearance of the towers when seen from the north. From the Victorian streets and squares to the north of the site, the broader profiles of the towers would result in a very different appearance compared with that seen from river views. The massing and the scale would be much more dominant.

The neighbouring recent development of Chelsea Harbour has resulted in a fairly consistent form of development along this stretch of the river, with solid urban blocks approximately six stories high, fronting the water. In contrast, the proposed towers would appear as lightweight buildings of a radically different scale. They are depicted as floating on grassy banks in a way that would appear alien to the existing character of the riverside. The towers would also clash harshly with the prevailing character of the Chelsea riverside further to the east, where the river dominates and the buildings are of a domestic scale - not unlike a Flemish town.

The applicants state that the towers facilitate more open space. The prevailing built form of the RBKC proves this to be incorrect. The borough has the highest development density in London achieved mostly through five storey terraces, and there are plenty of open spaces, as demonstrated with the garden squares. (There is also scientific research to prove that high buildings do not result in more open space). The development of this riverside site would reinforce the special character of the borough if the designers worked with the principal of high density and a sense of place, without very tall buildings.

The adopted planning brief for the site states; "The maximum height permissible is six or seven stories but this must be balanced against lower heights elsewhere on the site and residential density considerations." (Paragraph 2.31). It goes on; "If the power station is retained then it will form the dominant landmark on the site to which all other new buildings around it should be subordinate in height." And, "... Increased height in parts of the site to create visual interest may be acceptable. However, high buildings will be resisted in line with the provisions of Policy CD31." (See paragraph 2.32 of the brief). The UDP policy CD31 states; "To resist a new high building which would significantly exceed the height of neighbouring buildings and which would harm the skyline."

Paragraph 2.10 of the UDP states that; "The high buildings of the World's End Estate are not in character with the remainder of the Riverside and should not be seen as a precedent for similar developments. Any new development should enhance the special character of the Riverside."

Policy CD 4 of the UDP states; "To require any development on the riverside to preserve or enhance the waterfront character, protect or improve physical and visual links between the river and the rest of the borough, and be of a height no greater than the general level of existing building heights to the east of Blantyre Street."

Public spaces

The surrounding local area would pay a significant price for creating the proposed new landmark. As well as causing overshadowing, overlooking and visual intrusion into views out of Conservation Areas, it would also mean that no significant public space could front the River Thames in this location. The proposed layout includes a mean, narrow pathway in the area between the tower and riverbank. The Planning Brief states; "A new node may be created by the convergence of paths into a new public open space adjacent to the riverside." (Page 38).

In my previous observations I drew a parallel between the potential of the site and the Piazza San Marco in Venice that includes a progression of integrated spaces that culminates with a dramatic opening onto a lagoon. The same principle should be at work here, to create a dramatic sense of arrival; but the proposed tower occupies the area with the best views.

A square is proposed to be included within the RBKC site, but it is set back from the river, in a heavily enclosed area at the end of the power station. None of the submitted information is convincing that this would be a successful public space. More work is required to produce an urban form and layout which shows a convincing transition from the Lots Road into the new public spaces of the site; which shows a progression of spatial experiences culminating with the River Thames; and which respects the setting of the power station but also integrates it into the new master plan.

I support English Heritage's stated view that, "More detailed work is still needed to resolve the public spaces around the site and also on the relationship between the power station and the proposed new buildings."

A square is proposed to front the river in the Fulham site and clearly the whole of the master plan with three sites need to be completed in their entirety, but I still suggest that a revised urban form be required on the RBKC site to include a dramatic space fronting the river.

The proposed bridge links and the increased permeability through the power station are welcomed, as are the recreational/wildlife proposals for the creek. Notwithstanding the harm caused by the proposed tall buildings, much of the layout in the Fulham side of the development is interesting.

The conversion of the power station

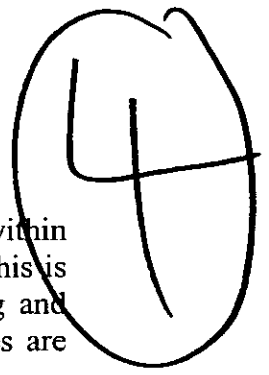
With regard to the power station building, a sensitive conversion is required. Following on from our recent site inspection, there was less of interest than may have been hoped. (The area of cleaned brick that we inspected was of rather dubious quality). However, I support English Heritage's view that more of the original fabric should be retained including the 1930's control room, overhead gantries and other internal elements - including the spine wall between the two turbine halls. The building should also be fully recorded before any demolitions or alterations take place. Given that an application for listing is in with EH, I expect the applicants will be willing to carry out EH's requests.

Parking/servicing

The recently submitted Cumulative Impact Report states that the area is within walking distance of numerous local transport rail/underground routes - surely this is not accurate and the development will be heavily car dependent? Car parking and servicing arrangements should not be at surface level where new public spaces are proposed.

Please copy these observations to the applicant if that would help.

N. Corbett



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
CONSERVATION AND DESIGN OBSERVATIONS

Lots Road Power Station Site, App. No. PP/01/1627

To DC Officer: J W Thorne
Area: SW. Code: N
From: N. Corbett

Date: 18.01.02

The layout and urban form of development

Having considered the further submissions and made a site visit, it is clear that the proposed tall buildings are dictating the layout of the master plan, especially for the RBKC part of the site. The positioning of the towers, their orientation, profile, and detailed design, are all being driven by the desire to make a dramatic impact on the strategic river views. The layout of other new buildings, and the disposition of open spaces, are dependent upon, and appear to be compromised by, the positioning of the towers.

The general layout and urban form of the new development is a critical issue and design work needs to be focused on this area. There needs to be greater appreciation of how the spaces will be integrated, physically and visually. The layout of development and the disposition of public spaces needs to be considered as a central theme, it is a fundamental principal that has not been discussed with the applicants. It would be more helpful if at least two options were to be developed, one with the tall buildings and one without. Alternative schemes should have been developed as part of the environmental impact assessment, especially an option that included high density without high-rise.

Tall buildings

The river frontage of the RBKC site is one of the most important in London. This is not least because of the mile long vista to Vauxhall, with the resulting magnificent views. If the proposed tall building were to be allowed here, it would close that view and would probably be one of London's most visually prominent (or dominant) landmarks. The open river, sky, and the slender chimneys of the power station currently define the area. There are other towers randomly located in the vicinity, but it is difficult to say they form a meaningful relationship with each other. To a significant extent, the existing power station already serves as an appropriate landmark, and we need to ask ourselves if this is the right location for an even greater landmark. I suggest it is not; the site is not a new area of London-wide significance, like Docklands, it is one small part of Chelsea.

It is a little alarming to see that the design of the towers is still being fundamentally developed. The new EH/Cabe Guidance on Tall Buildings states that proposals should be "fully worked up" and "of the highest design quality." The most recent proposal is in terracotta instead of steel, and the area of glass has been reduced because the



architects need to reduce the potential heat gain. It would be more convincing if these issues had been resolved prior to submission; not least so the public could comment on the actual scheme being proposed.

Important though the strategic river views are, we clearly need to consider the other effects of the proposed development. A key consideration is the appearance of the towers when seen from the north. From the Victorian streets and squares to the north of the site, the broader profiles of the towers would result in a very different appearance compared with that seen from river views. The massing and the scale would be much more dominant.

The neighbouring recent development of Chelsea Harbour has resulted in a fairly consistent form of development along this stretch of the river, with solid urban blocks approximately six stories high, fronting the water. In contrast, the proposed towers would appear as lightweight buildings of a radically different scale. They are depicted as floating on grassy banks in a way that would appear alien to the existing character of the riverside. The towers would also clash harshly with the prevailing character of the Chelsea riverside further to the east, where the river dominates and the buildings are of a domestic scale - not unlike a Flemish town.

The applicants state that the towers facilitate more open space. The prevailing built form of the RBKC proves this to be incorrect. The borough has the highest development density in London achieved mostly through five storey terraces, and there are plenty of open spaces, as demonstrated with the garden squares. (There is also scientific research to prove that high buildings do not result in more open space). The development of this riverside site would reinforce the special character of the borough if the designers worked with the principal of high density and a sense of place, without very tall buildings.

The adopted planning brief for the site states; "The maximum height permissible is six or seven stories but this must be balanced against lower heights elsewhere on the site and residential density considerations." (Paragraph 2.31). It goes on; "If the power station is retained then it will form the dominant landmark on the site to which all other new buildings around it should be subordinate in height." And, "... Increased height in parts of the site to create visual interest may be acceptable. However, high buildings will be resisted in line with the provisions of Policy CD31." (See paragraph 2.32 of the brief). The UDP policy CD31 states; "To resist a new high building which would significantly exceed the height of neighbouring buildings and which would harm the skyline."

Paragraph 2.10 of the UDP states that; "The high buildings of the World's End Estate are not in character with the remainder of the Riverside and should not be seen as a precedent for similar developments. Any new development should enhance the special character of the Riverside."

Policy CD 4 of the UDP states; "To require any development on the riverside to preserve or enhance the waterfront character, protect or improve physical and visual links between the river and the rest of the borough, and be of a height no greater than the general level of existing building heights to the east of Blantyre Street."

Public spaces

The surrounding local area would pay a significant price for creating the proposed new landmark. As well as causing overshadowing, overlooking and visual intrusion into views out of Conservation Areas, it would also mean that no significant public space could front the River Thames in this location. The proposed layout includes a mean, narrow pathway in the area between the tower and riverbank. The Planning Brief states; "A new node may be created by the convergence of paths into a new public open space adjacent to the riverside." (Page 38).

In my previous observations I drew a parallel between the potential of the site and the Piazza San Marco in Venice that includes a progression of integrated spaces that culminates with a dramatic opening onto a lagoon. The same principle should be at work here, to create a dramatic sense of arrival; but the proposed tower occupies the area with the best views.

A square is proposed to be included within the RBKC site, but it is set back from the river, in a heavily enclosed area at the end of the power station. None of the submitted information is convincing that this would be a successful public space. More work is required to produce an urban form and layout which shows a convincing transition from the Lots Road into the new public spaces of the site; which shows a progression of spatial experiences culminating with the River Thames; and which respects the setting of the power station but also integrates it into the new master plan.

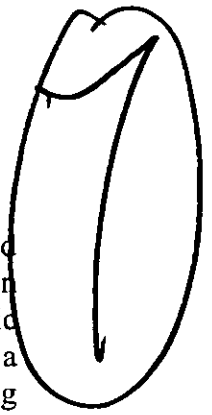
I support English Heritage's stated view that, " More detailed work is still needed to resolve the public spaces around the site and also on the relationship between the power station and the proposed new buildings."

A square is proposed to front the river in the Fulham site and clearly the whole of the master plan with three sites need to be completed in their entirety, but I still suggest that a revised urban form be required on the RBKC site to include a dramatic space fronting the river.

The proposed bridge links and the increased permeability through the power station are welcomed, as are the recreational/wildlife proposals for the creek. Notwithstanding the harm caused by the proposed tall buildings, much of the layout in the Fulham side of the development is interesting.

The conversion of the power station

With regard to the power station building, a sensitive conversion is required. Following on from our recent site inspection, there was less of interest than may have been hoped. (The area of cleaned brick that we inspected was of rather dubious quality). However, I support English Heritage's view that more of the original fabric should be retained including the 1930's control room, overhead gantries and other internal elements - including the spine wall between the two turbine halls. The building should also be fully recorded before any demolitions or alterations take place. Given that an application for listing is in with EH, I expect the applicants will be willing to carry out EH's requests.



Parking/servicing

The recently submitted Cumulative Impact Report states that the area is within walking distance of numerous local transport rail/underground routes - surely this is not accurate and the development will be heavily car dependent? Car parking and servicing arrangements should not be at surface level where new public spaces are proposed.

Please copy these observations to the applicant if that would help.

N. Corbett

COMMUNITY STRATEGY AND NEIGHBOURHOOD RENEWAL STRATEGY

Residents and Tenants Groups consultation meeting on the draft strategies

South Kensington and Chelsea – 11th February 2002

The meeting was attended by 18 people, representing residents and tenants groups in the South Kensington and Chelsea area of the Borough. All residents and tenants groups based in this area had been invited.

A presentation was given that outlined the main themes in the strategies. Following this participants divided into two discussion groups for a more detailed response.

Those attending were also asked to look at the list of issues and concerns that had been raised in the earlier consultation that were both Borough wide issues and those specific to the South Kensington and Chelsea area. Given five 'sticky dots' they were asked to identify the five issues they felt were most important.

The following table shows the number of dots or votes each issue received and consequently its priority ranking. The five top priorities are highlighted in grey.

Participants also had the opportunity to add any issues they felt were missing from the list. These are listed at the end.

Issue/Concern	Number of dots	Ranking
Increase the number and visibility of police on streets.	9	1st
Manage the environmental implications of the country's most densely occupied Borough becoming more densely occupied still – especially, pollution, congestion, waste disposal.	9	1st
Mitigate '24-hour economy' pressures and consequences by using planning and licensing powers to protect the residential quality of areas.	8	2nd
Engage the community in the redevelopment of Lots Road Power Station.	7	3rd
Maintain shops that provide for local every day needs through the management of lettings of Council-owned shops.	7	3rd
Reduce the fear of crime, especially among the elderly.	6	4th
Develop a new secondary school in Chelsea.	6	4th
Lobby for more and better public transport.	5	5th
Develop better ways of tackling youth disorder and anti social behaviour.	4	6th
Where developments will inevitably increase residential densities and create transport demands and environmental pressures ensure there are some benefits for local people.	4	6th
Increase supply of affordable housing.	3	7th

Lobby for more public transport in South West Chelsea – more buses; a station on the West London line at Chelsea Harbour; and a commitment to build a tube line through Chelsea.	3	7th
Increase capital investment and community development in South-West Chelsea.	3	7th
Help isolated people, including the housebound, to engage and participate	2	8th
Install more closed circuit television	1	9th
Promote local agencies and organisations actively recruiting local people	1	9th
Establish a business forum to better engage with the business community.	1	9th
Help unemployed people to find work.		
Expand and publicise local services and information being available via a computer.		
Encourage social landlords to learn and adopt good practices from each other.		
Increase the supply of affordable childcare.		
Research the housing needs of minority groups and people from different cultures.		
Increase availability of street parking.		
Improve sports facilities – eg. provide an all weather pitch.		
Rejuvenate the Museums quarter, for example refurbish Exhibition Way and redevelop South Kensington tube station.		

Issues that participants felt were missing

- Cycle facilities should be mentioned in the strategies.
- Greater controls and limits on through traffic in residential areas.
- Do not continue to sell residents parking permits where soon there will be no room to park.
- Tackle traffic congestion by not allowing any more big developments in high density areas.
- Take action against polluting cars/vans with faulty exhausts.
- Provide more green spaces for residents.
- More focus on World's End – sports facilities, open spaces, re-do the World's End courtyard, more youth programmes, better transport.
- Zero tolerance of black bag dumping between rubbish collections.
- Restrict the number of new restaurants and clubs in the area.
- Actively encourage business start up's, business parks etc.
- Develop programmes to promote the health of the community, better hospital facilities.

Questions and Issues raised following presentation of the Strategies

Planning

There are far too many gated communities springing up around RBKC. These developments result in roads being cut off and as people are no longer able to park in these roads it results in further congestion on roads where gated communities do not exist.

Furthermore, retaining a social mix within communities is very important. Gated communities result in areas, particularly Chelsea, becoming too elitist. The participants did not want all exclusion zones.

Concern that shops are being forced to close in World's End as a result of rent prices increasing dramatically. Also in Fulham Road there was a great concern that several everyday shops, such as electrical shops, butchers, have been forced to close due to increases in rent. Members of the group made clear that they do not support only one-stop shopping, for example only using large supermarkets.

Participants suggested that the Council should strongly lobby the Government in order to change the law regarding the use of shops, so that local amenity shops could not be changed to expensive arts/gift shops, for example.

Participants thought there should be a limit on the number of houses that a person can buy to rent, as developers were making a fortune out of renting houses and flats in the borough, but this was having a detrimental affect on the character of the Borough.

When planning application are looked at what status does the view of traffic engineers hold? Are their views taken seriously?

Lots Road

There was a great deal of concern by participants over the proposed development of Lots Road. A representative from the Planning Department did stress that any development is accompanied by an environmental assessment, including an assessment of the traffic implications. Felt to be too much development for the road network to handle – will lead to further traffic jams on small roads. The proposal to run an extra 22 buses per hour was not felt to be feasible as this would lead to further grid lock.

Other concerns:

- It is not clear what is being proposed.

- Can Artists Studios be included?

- What can be done to restrict/influence outside developers?

- How can we cap/end development?

- Why demolish the power station?

- Do not allow development that destroys the village feel.

- Restrict the height of all development and prevent a wind tunnel effect

Transport

There was a lack of support for a suggested tube line for the King's Road. There was concern that this would bring economic pressures, particularly rent increases and shops will no longer be able to afford the rent. This will result in smaller, more eccentric shops being lost to the area and they will be replaced by the normal high street shops which can be found everywhere. This will "ruin the character of the area."

However, one person felt that the very South West corner of Chelsea deserved a tube line and they did not think such a development would hinder the character of the that area.

There was concern that many large lorries are coming into the Borough as a result of the one-stop shopping policy, as the lorries are delivering to the large supermarkets.

Traffic congestion was a major issue to those who attended the meeting.

The Strategy

It should be made very clear in the NRS which policies are set by central government, and therefore are policies which the Council has limited control over, and which policies the Council does have control over. By setting out such a comparison will allow local residents to see how much they can influence. The two things should not be mixed up.

Concern about the Community Strategy fits with the UDP – does one replace the other?

Area Forums

A representative from the Planning department explained to those present about Area Forums. These are meetings which take place up to three times a year which local residents who have put their name forward attend. At the meetings planning policies and decisions are discussed.

Those present thought these were an excellent idea. However, one person stressed that these would only be a good idea if the views provided by participants are taken into consideration and acted upon.

Write up of discussion group ONE:

Participants in the smaller group expressed a frustration that no one in the Council is listening to them and they did not feel that their local Councillors were interested in their concerns, particularly concerning planning and environmental concerns.

They strongly suggested that the Council should lobby the Government more on policies which central Government has control over.

In regard to a discussion on the proposed Lots Road development, one participant noted that in Major European Cities do not allow such major developments to take place, only small and minor developments to homes can be undertaken.

The group felt very strongly that a “cap should be put on the population”. This would prevent developers from trying to attract more and more people into the Borough when it is clear that there are already too many people here.

There is a general feeling that if large multi-storey buildings are allowed to be built, this would destroy the village-like feel of Chelsea which attracted many.

Worlds End – what facilities for young people – need to deal proactively with youth crime. Lack of park facilities leave little for children to do.

Improving consultation – need to be creative about this. Use parish notice boards (low tech solutions) as well as the Internet. Develop an automatic e-mail service to alert people to proposals in their area etc.

Need to see if there are any ways of buying sites at risk of inappropriate development (either the Council or a responsible landlord) for more socially responsible developments.

Write up of discussion group TWO

Local shops. Area has lots of stalls. All sell flowers. Why not license to sell produce. Why not require a local market as part of the planning gain from developers?

12

Double parking in King's Road. Traffic wardens generally do good job but frightened of commercial vehicles. Pinch point is around Royal Avenue. Safeways lorries noisy and intrusive. Contrast M&S's. Night time deliveries – who controls this? How can it be regulated? Red and white signs are a hazard.

Main weakness of the borough is enforcement. Regular and fair enforcement – e.g. builders shrouds covering scaffolds.

Security a problem. Lots of problems in Worlds World. And Lots Road areas. Anti-social tenants

Over-emphasis on the south-west of the Borough. Not enough emphasis on the rest of this area. One of the main arguments in favour of the Lots Road development is that it will benefit local people- especially the buses. But however many more buses provided, there's still only one road.

Traffic calming schemes have been a disaster. Tremendous amount of street clutter. 'Pig-pens' in middle of road. Positioning of traffic lights: come across them suddenly – dangerous.

These are relatively trivial things. Not a high priority. Real issue coming through is concern about the increasing density of the borough.

Central government policy to slow traffic down – causes congestion.

College of St Mark and St John. No affordable housing provided on site. Affordable housing should be provided on site. Council should manage its own housing

Problems with TMO and scaffolding around council housing (Edith Grove?)

New secondary school: The Council has safeguarded a site in Hortensia Road. Do they need to have a school within the borough? Why not in Wandsworth? Hortensia Road is not a good site for transport reasons

Strategy should distinguish three levels of responsibility

- Local – council matters
- London, including Mayor's strategies - lobbying
- National – lobbying central government

RSLs and developers should be represented on LSP

Recycling – should be better publicised; designated areas disappearing;

Further note sent in from one of the participants representing the Chelsea Society

Thank you and your colleagues very much for taking the time you did last night at the meeting with Chelsea residents. One issue that the meeting clarified in my mind is the growing concern of residents about the increasing intensity of development in Chelsea. For people who live here this intensity reveals itself in buildings of increased bulk (as for instance at the Chelsea Westminster Hospital and on the site of the College of St Mark & St John), more day, night and weekend traffic on the main roads but also zipping down every side street, and the press of people on the pavements - particularly in King's Road as retail floor space on it is gradually expanded (the Duke of York's HQ development and the new Peter Jones, though yet to come on stream, can be expected to exemplify this trend with great force).

This concern about density and intensity is, of course, is contrary to the report of the Urban Task Force, the Urban White Paper and current government guidance - all of which are about increasing urbanity. But since the meeting was focussed on long term issues, I think that it is

something the Council will have to take very much to heart. The Lots Road Power Station is an important focus for the concerns I have set out above - even though its retailing component is small.

The impact of the proposed Chelsea/Hackney tube line will need to be considered very carefully in the light of residents' worries about over-development. Such a underground line would, no doubt, help Chelsea residents to reach the West End and City. However it would also act as a stimulant to further retail expansion in King's Road and it would probably increase residential property prices. Furthermore as any new shops would also most certainly be national chains, King's Road would become more like other high streets from Uxbridge to Bromley.

Is this the future for Chelsea that residents want? I do not think so. The reality is that Chelsea is already a perfect example of what government guidance seeks to achieve. It is high density but also liveable. There is a grave danger that commercial development pressures will push it over the top. Residents feel that this is happening right now.

Mark Beauchamp
Research and Consultation Manager

Telephone 020 7361 2402
E-mail mark.beauchamp@rbkc.gov.uk

TOWN CLERK AND CHIEF EXECUTIVE

THE TOWN HALL HORNTON STREET LONDON W8 7NX

Town Clerk and Chief Executive DEREK MYERS BA LLB

Jim Pool
Montague Evans
44-48 Dover Street
London
W1S 4AZ

Web:

www.rbkc.gov.uk

THE ROYAL
BOROUGH OF



KENSINGTON
AND CHELSEA

14 May 2002

My reference:

Your reference:

Please ask for:

Dear Jim

Lots Road Power Station

Following our meeting two weeks ago and subsequent phone call I am writing to set out my thoughts regarding the contribution which redevelopment proposals for the power station might make towards Economic Development Initiatives.

We are sure there is a greater market for commercial space in the area than that outlined in the Jones Lang LaSalle report. Experience from North Kensington shows that once a sufficient number of units are located together the demand follows the creation of the cluster. The Kensal Road Employment Zone had very few small creative and media businesses located there 15 years ago and is similarly quite a distance from the tube station. It now has a thriving cluster of businesses with prices in excess of £25 per square foot for the better units. This would be considerably more in the south of the borough. Most of these businesses relocated from outside the area or were new start-ups, the majority of them were not from the local businesses pool. The study by Jones Lang LaSalle bases the projected demand for units on the businesses currently in the area which is inappropriate.

At the meeting we also discussed what the developers could do, in addition to substantially increasing the provision of commercial floorspace within any revised scheme, to support the Lots Road Employment Zone. I mentioned the possibility of business start-up units in the Power Station being leased to the Council at a peppercorn rent for a period of time, say 10 years from completion. The amount of space would depend on a number of factors, including other agreements under section 106. The Council would use the space to offer subsidised units to local people starting businesses which could also work as feeders units for the other units on the development. The income from the subsidised rent would be used to provide business and training advice / provision for local residents.

Whatever the level of commercial floorspace in the power station we would expect a level of funding to improve a range of services in the area as the demands on these services will be substantially increased.

Construction Training

A provision for construction training would be desirable as part of the Section 106. Notting Hill Housing Trust group have been running a construction training scheme in a number of boroughs including Kensington & Chelsea for a number of years. The formula used to calculate the amount of

construction training was devised on much smaller schemes than Lots Road but the list below would be a starting point for negotiation:

- 160 training weeks for every £4m of the construction contract
- 0.25% of the value of the construction contract to fund the construction training programme (including trainee placement and support). There could be some onsite brokerage service
- Trainee wages of £195 per week (as in the Working Rule Agreement)
- Best endeavours to have 20% of the workforce local (Central London)

16

Each section 106 agreement is different to meet local circumstances however, I have a copy of the section of Battersea Power Station Section 106 relating to local employment. This includes obligations on the developer or contractor to support the local employment agreement with funding in excess of £1,350,000 over 4 years. If you would like to see it please let me know.

I hope this is of use to you and you will appreciate that this advice is given without prejudice to any future decision of this Council's Planning Services Committee.

Yours sincerely

Vera Gajic
Employment Initiatives Coordinator

CC John Thorne, Planning
Steve McCormack, Planning
Malcolm Souch
Mike French, Executive Director of Planning
Colin Richardson, Head of Policy

French, Michael: PC-GrpSvc

① (JT)
② file
③ 17

From: Gajic, Vera: CP-Comm
Sent: 15 May 2002 14:37
To: 'jim.pool@montague-evans.co.uk'
Cc: 'andrew.looke@uk.taylorwoodrow.com'; French, Michael: PC-GrpSvc; Thorne, John W.: PC-PlanSvc; Souch, Malcolm: PC-PlanSvc; McCormack, Steve: PC-PlanSvc; Richardson, Colin: CP-Comm
Subject: Lots Road Power station

Dear Jim

Attached is a letter detailing the points made at our recent meeting. I will put a hard copy in the post.

Regards



letterjimpool.doc

Vera Gajic
Economic Initiatives Coordinator
Royal Borough of Kensington & Chelsea
Town Hall, Hornton Street, W8 7NX
Tel: 020 7361 3355

**The Royal Borough of Kensington &
Chelsea**

**Key Decision Report dated 17th June
2002**

**For Decision by Councillor Barry Phelps,
Cabinet Member for Planning and
Conservation**

**Report by the Executive Director,
Planning and Conservation**

**RESPONSE TO DTLR CONSULTATION
PAPER – "DEVELOPMENT ON LAND
AFFECTED BY CONTAMINATION, DRAFT
TECHNICAL ADVICE".**

1. Introduction

- 1.1 In February 2002 the DTLR published a consultation document which offers guidance concerning land which is affected by contamination. This draft technical advice is intended to revise and update the existing guidance on contaminated land contained in PPG23 "Planning and pollution control." and that set out in Annex 1 of DETR circular 02/2000, "Contaminated Land". The Government have yet to decide on the form this draft technical advice will take.
- 1.2 The consultation paper asks a number of questions relating to nature of the guidance.
- 1.3 This paper outlines the main issues considered by the draft planning technical advice; considers the implications that it may have upon the Royal Borough; and details the Council's response to the questions contained in the DTLR paper. It has been prepared in consultation with the Executive Director of Environmental Health.

2.0 Background to the guidance

- 2.1 The guidance states that the existing planning policy on contaminated land will remain largely unchanged. The draft technical advice aims to develop existing guidance. It aims to help local authorities ensure that new development and its use is safe, that unacceptable risk is managed appropriately, and that new contamination problems are not created.
- 2.2 The draft technical advice is intended to complement the contaminated land regime under Part IIA of the Environmental Protection Act 1990, (EPA) which provides the mechanism to identify and remove unacceptable risks due to contamination and to

bring damaged land back into beneficial use. The draft technical advice stresses that the EPA regime only covers the existing use of land whilst the planning system can and does consider the future uses of land. The draft technical advice recognises that the remediation of contaminated land will be largely through the planning system. This reflects the fact that the most economical way to deal with contaminated land will often be by redevelopment.



- 2.3 The draft technical advice reflect the Government's view that the re-use of previously developed land is central to objectives of ensuring sustainable development.

3.0 Principle issues considered by the guidance

- 3.1 The draft technical advice seeks to build upon the three specific objectives that underlie the Government's approach to land contamination:

- (a) to identify and remove unacceptable risks to human health and the environment;
- (b) to seek to bring damaged land into beneficial use; and
- (c) to seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.

- 3.2 The draft technical advice concentrates on a number of issues:-

Contamination as a material planning consideration

- 3.3 Land contamination, or the possibility of it, is a material planning consideration in the preparation of development plans and the decisions on planning application.

- 3.4 Policies in development plans should outline the consideration that will be given to land that may be affected by contamination. This is already the case. PPG12, "Development plans" notes that "Development Plans should be drawn up in such a way as to take environmental considerations comprehensively and consistency into account."

Responsibility of interested parties

- 3.5 Developers are primarily responsible for identifying, characterising, and dealing with any contamination issues relating to a development. Planning departments are responsible for the control of development, and the enforcement of conditions. Environmental health departments are the enforcing authorities for the contaminated land regime.

Standard of remediation

- 3.6 The standard for remediation of contaminated sites under development is necessary to ensure the removal of unacceptable risk, and make the site suitable for its proposed new use.

Encourage pre-application discussions

- 3.7 Where practical, it is good practice that the developers contact the local planning authority for informal pre-application discussions.

Contamination to be considered as part of the planning process

- 3.8 The advice stresses the need to ensure that where development is proposed on land which may be affected by contamination, it is important that any unacceptable risk is identified and dealt with through the development process. The guidance states that before granting planning permission, the Local Planning Authority (LPA) should ensure that full account is taken of the condition of the land concerned and that appropriate remediation is carried out to deal with unacceptable risk, or required through the use of conditions.

- 3.9 In granting an application the LPA should be satisfied that the developer can deliver a development which does not incur unacceptable risk to human beings, any ecological system, or any property; does not create new pollution linkages; does not leave unacceptable concentrations of contaminants in place; and does not impede necessary remediation for other contamination problems. Any necessary remediation should be implemented either before development proceeds or as a feature of the development process. Where appropriate conditions should be attached to ensure that future contamination with the associated risk to human health and the environment do not occur.

- 3.10 The LPA should normally require a desk study where:

- the current or past land use or any other information suggest that contamination may be present; or where
- the proposed use of land is vulnerable to any past contamination (for example housing with gardens).

- 3.11 Where the desk study establishes that contamination is likely a full site investigation and risk assessment may be required to gather more detailed information concerning the contamination of the site and to establish what problems might require remediation or whether remediation could be secured by means of planning conditions. It will be appropriate to leave the detailed remediation to conditions to be implemented following the grant of the permission

Use of conditions and planning obligations

- 3.12 Planning permissions should include appropriate conditions or obligations for the development of contaminated sites covering the possibility of discovering previously unsuspected contamination during the development process, and setting out the necessary remediation of the sites.

3.13 Conditions can:

- include requirements to require the collection and reporting of further information on site conditions;
- set out detail of the necessary investigations;
- provide for a remediation scheme, which should meet all the tests set out in Circular 11/95, "Use of Conditions";
- be linked to time; and can
- include provision of a completion record, detailing the conclusions and actions taken at each stage of the process.

4.0 IMPLICATIONS ON THE ROYAL BOROUGH

4.1 The implications of the draft technical advice upon the Royal Borough are considered to be limited as the guidance does not materially add to the requirements on local planning authorities or developers which are already in place through existing planning guidance. The Government is explicit in this opinion. Furthermore, the draft technical advice is not intended to be prescriptive. A degree of flexibility and interpretation is intended. The guidance states that, "the specific policies and practices to be adopted by the local planning authority in responding to the suspected or actual contamination of land are for them to decide in the light of circumstances pertaining within their area."

4.2 However, the built up nature of the Royal Borough does ensure that contamination is a important Borough wide issue. All development is likely to be on previously developed land and consequently will have the potential to be on land which has been contaminated. Therefore, the Council welcomes the essence of the advice and recognition that contaminated land is an important issue which must be dealt with in an efficient and effective manner. The draft technical advice is considered to complement the contaminated land procedures which are currently in place within the Borough and as such is likely to improve the decision making process. It will help provide advice which overlaps the current environmental health and planning disciplines. Furthermore, the guidance is considered to encourage an integrated Council-wide approach to the contaminated land use and to build upon the existing links between the Royal Borough's planning and environmental health departments. The setting out of the obligations of both the local planning authorities and developers is likely to strengthen the Council's position when requiring developers to deal with contamination in a proper manner.

4.3 There is some potential for the implementation of the draft technical advice to slow down the decision making process. Whilst the Royal Borough's current practice is to require remediation strategies for sites where the Council is aware that there is a high risk of contamination, the Council does rely on the use of conditions to ensure that less predictable contaminated issues are dealt with. The draft technical advice places a greater emphasis on the

22

submission of full site investigation and risk assessment, with the associated consultation, at the planning application stage. The consideration of further information may cause a delay in the granting of planning permission.

5.0 Response to Individual Questions (DTLR questions in italics)

5.1 *Do we need such advice in a simplified, leaner, planning system?*

The Royal Borough welcomes the publication of clear guidance which relates to planning and the role it can play in the remediation of contaminated land. Guidance which attempts to integrate the environmental health and planning processes is considered to be appropriate in a multidisciplinary field such as land contamination. The guidance is considered to complement the contaminated land procedures which are currently in place within the Borough and as such is likely to improve the decision making process. The Council has commented separately on the Government's proposals for changes to the planning system.

5.2 *Is the advice sufficiently clear and aimed at the right level of leadership?*

The guidance note has been written in "plain English" and is explicit in setting out the responsibilities of both the developers and of the local authorities. On the whole it will be understood by professionals in the planning process. However, given the technical nature of the guidance note, there are a number of terms which may not be familiar to a planning officer with limited knowledge of the contaminated land regime. A glossary would be useful defining these technical terms. For example the term "special site" has a precise legal definition in terms of the part II of the Environmental Protection Act, and implications of which a planning officer may be unaware.

The guidance should also be written to be clear and easily understood by the general public. Therefore, further explanation would be useful regarding the differing types of land contamination.

5.3 *Will it lead to better decision-making enabling lower risks of contamination and more sustainable re-use of previously developed land?*

The Council welcomes the principle of the advice which emphasises the role that the development/planning process can have on the remediation of contaminated land and which encourages a multidisciplinary approach to contamination.

However, the Council is concerned that there is some potential for the implementation of the draft technical advice to slow down the decision making process. The draft technical advice appears to place a greater emphasis on the submission of full site investigation

and risk assessment, with the associated necessary consultation, at the planning application stage. Whilst this may allow the remediation of contamination to be in the forefront of the decision making process it is also likely to cause a significant delay in the granting of planning permission. Contamination and the remediation of contaminated land may take a greater role in the decision making process at the expense of the speed of the decision, which is a high priority Government target for the planning system.

- 5.4 *Advice is provided on the use of planning conditions and planning obligations. Although the draft does not include "model" conditions, would this be a useful addition?*

The inclusion of model conditions would be a useful addition to the guidance given the technical nature of remediation of contaminated land. However, the guidance should not be so prescriptive in nature as to nullify Council officers' local knowledge or the particular circumstances of a particular site.

- 5.5 *Are the appendices useful in explaining the causes and effects of contamination and the relevant regimes?*

The appendices are extremely useful in explaining the causes and affects of contamination. It may be useful to expand the appendices further. For example, I note that the guidance advises interested parties to refer to Circular 02/2000 "contaminated land". This is a technical document which will not be easily digestible to town planners, developers and the general public. An explanation could be included within the Appendices.

- 5.6 *Is there a need for further appendices containing brief summaries of good practice on site investigation, risk assessment, remediation and maintenance, or will simple bibliographic reference to existing guides be sufficient?*

Further appendices will be useful as many of the guidance documents referred to within the draft technical advice will not be readily available to the general public.

In particular further guidance as to the 'best practice' for a desk top study and site investigation reports, would be welcomed. This should increase the quality of reports received by the Council. Of particular concern is the submission of desk top studies which relate to geo-technical requirements rather than human health effects of contamination. Concise advice which sets out the requirements of a desk top study will assist developers in preparing useful reports.

- 5.7 *Do any of the terms used require further explanation or illustration?*

Further information/definitions should be provided for:
- "Special sites"

- "Pollutant linkages"
- "Unacceptable concentrations".
- Box 1 – 5th bullet point. What is the definition of "other land nearby"?

5.8 *Is the advice likely to lead to any material increases in costs or saving for local planning authorities or applicants?*

The guidance is unlikely to have any significant implications on cost as the guidance does not materially add to the requirements on local planning authorities which are already in place through existing planning guidance.

6. Financial, Legal and/or Personnel Implications

- 6.1 The Director of Personnel & General Services has been consulted and has no comments on this report.
- 6.2 The Group Finance Manager has been consulted and has no comments on this report.
- 6.3 The Director of Law and Administration has been consulted and has no comments on this report.

7.0 Recommendation

- 7.1 I recommend that you approve the comments in this report as the basis for a response to the DTLR draft technical report.

Michael J. French
Executive Director, Planning and Conservation

FOR COMPLETION BY AUTHOR OF REPORT:

Date of first appearance in Forward Plan: 3rd May 2002

Key Decision reference identifier from Forward Plan:
00748/02/P/A

Background papers used in the preparation of this report:

DTLR, "Development on Land Affected by Contamination, Draft Planning Technical Advice"

Contact officer: Mr. Michael J French, Telephone 020 7361 2075,
E-mail: michael.french@rbkc.gov.uk

FOR COMPLETION BY GOVERNANCE SERVICES:

Report published on: 19th June 2002

Reported circulated to the Environmental Services, Environmental Health & Planning Policy OSC on 19th June 2002

25

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**

Mr. Andrew Hamilton,
Round Hill House,
Fawley,
HENLEY-ON-THAMES,
Oxon, RG9 6HU.

Switchboard: 020 7937 5464
Extension: 2944
Direct Line: 020 7361-2944
Facsimile: 020 7361 3463
Web: www.rbkc.gov.uk

19 June 2002

My reference: EDPC/MJF

Your reference:

Please ask for: Mr. French

Dear Mr. Hamilton,

Lots Road Power Station

Thank you for your letter of 9 June setting out your continuing concerns with regard to the possible development of the above site. At the present time, no application has been submitted, but I will of course ensure that you are notified to enable you to submit a formal response.

Yours sincerely,

M. J. French,
Executive Director, Planning and Conservation.

JENNY
PLEASE MAKE SURE HE'S
ON THE NOTIFICATION LIST
FOR THE NEW
LOT'S ROAD APPS

20/6

PLANNING AND CONSERVATION

THE TOWN HALL HORNTON STREET LONDON W8 7NX

THE ROYAL
BOROUGH OF

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS

Switchboard:

Extension:

Direct Line:

020-7937-5464

Facsimile:

020-7361-2467

2467

020-7361-3463



KENSINGTON
AND CHELSEA

File Copy

File Copy

File Copy

File

File

My reference:

Your reference:

Please ask for:

Date: 27th June, 2002

My Ref: DPS/DCSW/PP/02/1324 & 1325/JT

Please ask for: Tracey Rust (Planning Information Office) 7361 2080/John Thorne (Case Officer) 7361 2467

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990 - THE TOWN & COUNTRY PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGS. 1999
PROPOSED DEVELOPMENT AT: LOTS ROAD POWER STATION, LOTS RD, CHELSEA, SW10

Brief details of the proposed development which has been submitted as a pair of duplicate applications are set out below. Members of the public may inspect copies of the applications, plans and documents. The Council's Planning Services Committee, in considering the proposal, welcomes comments either for or against the scheme. Anyone who wishes to make representations about the application should write to the Council at the above address **within 1 month** of the date of this letter.

Due to the nature of the proposal, the large number of people notified, and Council resources, it is not possible to enter into detailed correspondence with respondents, other than to acknowledge receipt of letters of representation. Any queries should be directed to the Case Officer or the Planning Information Officer as detailed above. However, the availability of staff to respond may be limited at certain times. You are requested to particularly note the advice contained on the reverse of this letter in respect of the matters that can and cannot be taken into account when dealing with planning applications. You should also be aware that the plans and supporting documentation can be viewed at the Town Hall, King Street, Hammersmith, W6 9JU, although comments on any part of the development falling within the Royal Borough of Kensington and Chelsea should be directed to the Town Hall, Hornton Street, Kensington, as on the letter heading above.

PROPOSAL FOR WHICH PERMISSION IS SOUGHT: Conversion of Power Station to provide a mix of residential, retail, office, business and restaurant uses, together with erection of a 30 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. MAJOR APPLICATION

Yours faithfully

M.J. FRENCH

Executive Director, Planning and Conservation

WHAT MATTERS CAN BE TAKEN INTO ACCOUNT

When dealing with a planning application the Council has to consider the policies of the Borough Plan, known as the Unitary Development Plan, and any other material considerations. The most common of these include (not necessarily in order of importance):

- The scale and appearance of the proposal and impact upon the surrounding area or adjoining neighbours;
- Effect upon the character or appearance of a Conservation Area;
- Effect upon the special historic interest of a Listed Building, or its setting;
- Effect upon traffic, access, and parking;
- Amenity issues such as loss of Sunlight or daylight, Overlooking and loss of privacy, Noise and disturbance resulting from a use, Hours of operation.

WHAT MATTERS CANNOT BE TAKEN INTO ACCOUNT

Often people may wish to object on grounds that, unfortunately, cannot be taken into account because they are not controlled by Planning Legislation. These include (again not in any order of importance):

- Loss of property value;
- Private issues between neighbours such as land covenants, party walls, land and boundary disputes, damage to property;
- Problems associated with construction such as noise, dust, or vehicles (If you experience these problems Environmental Services have some control and you should contact them direct);
- Smells (Also covered by Environmental Services);
- Competition between firms;
- Structural and fire precaution concerns; (These are Building Control matters).

WHAT HAPPENS TO YOUR LETTER

All letters of objection are taken into account when an application is considered. Revised drawings may be received during the consideration of the case and normally you will be informed and given 14 days for further response. Generally planning applications where 3 or more objections have been received are presented to the Planning Services Committee which is made up of elected Ward Councillors. Planning Officers write a report to the Committee with a recommendation as to whether the application should be granted or refused. Letters received are summarised in the report, and copies can be seen by Councillors and members of the public, including the applicant. The Councillors make the decisions and are not bound by the Planning Officer's recommendation. All meetings of the Committee are open to the public.

If you would like further information, about the application itself or when it is likely to be decided, please contact the Planning Department on the telephone number overleaf.

WHERE TO SEE THE PLANS

Details of the application can be seen at the Planning Information Office, 3rd floor, Town Hall, Hornton Street W.8. It is open from 9am to 4.45pm Mondays to Thursdays (4pm Fridays). A Planning Officer will always be there to assist you.

In addition, copies of applications in the Chelsea Area (SW1, SW3, SW10) can be seen at The Reference Library, Chelsea Old Town Hall, Kings Road SW3 (020 7361 4158), for the Central Area (W8, W14, SW5, SW7) can be viewed in the Central Library, Town Hall, Hornton Street, W.8. and applications for districts W10, W11 and W2 in the North of the Borough can be seen at The Information Centre, North Kensington Library, 108 Ladbroke Grove, London W11 (under the Westway near Ladbroke Grove Station 020 7727-6583). Please telephone to check the opening times of these offices.

If you are a registered disabled person, it may be possible for an Officer to come to your home with the plans. Please contact the Planning Department and ask to speak to the Case Officer for the application.

PLEASE QUOTE THE APPLICATION REFERENCE NUMBER ON YOUR REPLY

French, Michael: PC-GrpSvc

From: Thorne, John W.: PC-PlanSvc
Sent: 04 July 2002 17:36
To: Case, Richard: ES-HwayTraf; Denington, Guy: ES-EnvHlth; French, Michael: PC-GrpSvc; Gajic, Vera: CP-Comm; Hughes, Amanda: ES-EnvHlth; Jackson, John: PC-BlgCtrl; Logan, Stanley: HS-PlanRes; McDonald, David: PC-PlanSvc; Mcgarvey, Joan: ES-SSDD; Morse, Paul: CP-Gov; Nick. Corbett (E-mail); Rust, Tracey: PC-PlanSvc; Souch, Malcolm: PC-PlanSvc; Swinburne, Graeme: ES-HwayTraf; Thorne, John W.: PC-PlanSvc; Turner, Chris: PC-PlanSvc
Subject: New application

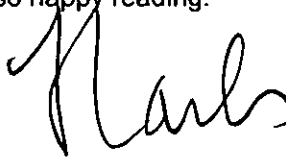
A new Lots Road application has been received in duplicate. We have worked our way through the pile of material and notification letters and consultations have gone out. Copies of plans and environmental statements should be on their way to you. If you are expecting them but have not received them could you contact Jenny McDermott on 2086.

I envisage getting together for an initial meeting in early August so it would be good to gather thoughts on possible S.106 inclusions, omissions in the submitted material and views on the appointment of external consultants to assist with Transportation, Sunlight and Daylight impact; and High Buildings/Design assessment.

Implicitly as this has been submitted in duplicate, they are likely to go to appeal after 13 weeks. I have suggested to their agent that if that is the approach to negotiation they are intending to take, we may well declare a moratorium on further discussion and all our resources will be diverted to defending the appeal.

I will be on leave from Next Monday until 22nd July so happy reading.

John



Richard Case Esq.
Royal Borough of Kensington and Chelsea
The Town Hall
Hornton Street
London
W8 7NX

Our ref: ML/3T49673/jc

5 July 2002

Dear Richard

Lots Road

As requested, we have given further consideration to traffic generation at the proposed redevelopment of the Lots Road Power Station. This includes analysis of the suggested worst case trip generation and comparison with the trip rates used in the Transport Assessment, those currently experienced at Chelsea Harbour next to our development and the TRAVL database.

Table 1 below, compares the various trip rates in ascending order for residential developments with car parking:

Table 1 Comparison of residential trip rates

Source		Two-way AM peak hour trip rate	Two-way PM peak hour trip rate
Chelsea Harbour		0.09	Not available
Calculation from national travel survey and census data		0.15	0.12
Lots Road Transport Assessment	Private housing	0.16	0.13
	Affordable housing	0.16	0.13
TRAVL database average		0.21	0.20
RBKC worst case sensitivity test	Private housing	0.28	0.33
	Affordable housing	0.59	0.43

Table 1 illustrates that the trip rates used in the Transport Assessment are higher than those surveyed at Chelsea Harbour and those calculated from the national travel survey and local census information, and lower than the TRAVL database average. The suggested worst case sensitivity test is significantly higher than the other rates, particularly for the affordable housing.

The two tables below compare the trip generation from the Transport Assessment and the suggested worst case sensitivity test trip rates before implementing the proposed transport improvements associated with the development. They also include an estimate of the net addition of traffic to the road network. This allows for traffic that will be removed from the network as a result of closing the Power Station and traffic that would be generated by the existing planning permission adjacent to Chelsea Harbour if it was constructed.

31

Richard Case Esq.
Royal Borough of Kensington and Chelsea

5 July 2002

Table 2 Traffic generation before transport improvements (pcu's)
Transport Assessment scenario

	AM peak hour			PM peak hour		
	In	Out	Total	In	Out	Total
Site A residential	20	33	54	27	17	44
Site A non-residential	12	4	16	0	8	8
Site B residential	36	59	95	47	31	78
Total generated traffic	69	97	165	74	56	130
Power station	-4	-1	-5	-7	-8	-15
Existing planning permission	-10	-17	-28	-14	-9	-23
Net increase in trips	54	78	132	53	39	92

Table 3 Traffic generation before transport improvements (pcu's)
RBKC Worst case scenario

	AM peak hour			PM peak hour		
	In	Out	Total	In	Out	Total
Site A residential	36	72	108	71	71	113
Site A non-residential	20	8	27	3	3	23
Site B residential	62	123	185	124	124	196
Total generated traffic	118	202	320	198	198	332
Power station	-4	-1	-5	-7	-7	-15
Existing planning permission	-16	-33	-48	-36	-36	-57
Net increase in trips	98	168	267	155	105	260

The above tables illustrate that, on the basis of the Transport Assessment, the develop adds approximately 132 pcu movements in the AM and 92 in the PM peak. The worst case sensitivity tests indicates an additional 267 pcu's in the AM and 260 in the PM peak. This net addition of traffic from the development is before any account is taken of the 16 new buses an hour which will serve the area, the improved river bus service, improvements to the West London Line, improvements for cyclists, new facilities within walking distance and other measures proposed as part of the redevelopment. These measures will benefit the 26,000 people who live within a 10 minute walking distance of the development, and over 50,000 people over a wider area.

We have assigned the development traffic to the surrounding road network and analysed the impact using TRANSYT. The attached figures illustrate the net change in traffic. These demonstrate that development traffic dissipates quickly on to the road network and therefore only adds a small amount of traffic at individual locations even before any allowance has been made for the transport improvements.

32

Richard Case Esq.
Royal Borough of Kensington and Chelsea

5 July 2002

At the Lots Road/Kings Road junction the development adds 8 pcu's in the AM peak for the Transport Assessment scenario and 38 in the worst case scenario. At Lots Road/Cremorne Road the development adds 81 pcu's in the AM peak for the Transport Assessment scenario and 104 in the worst case scenario, 28 of these are buses.

The enclosed TRANSYT runs of the worst case scenario demonstrate the Lots Road/Cremorne Road junction continues to work within capacity. At Lots Road/Kings Road the queues on Lots Road increase slightly. This should discourage rat running traffic on Lots Road which currently accounts for around one third of traffic. Again it should be noted that this is before the beneficial effects of the transport improvements are taken into account which we expect to more than mitigate the impact of the development and lead to reduced traffic flows across the network.

If you have any queries with regard to the above, please do not hesitate to contact us.

Yours sincerely

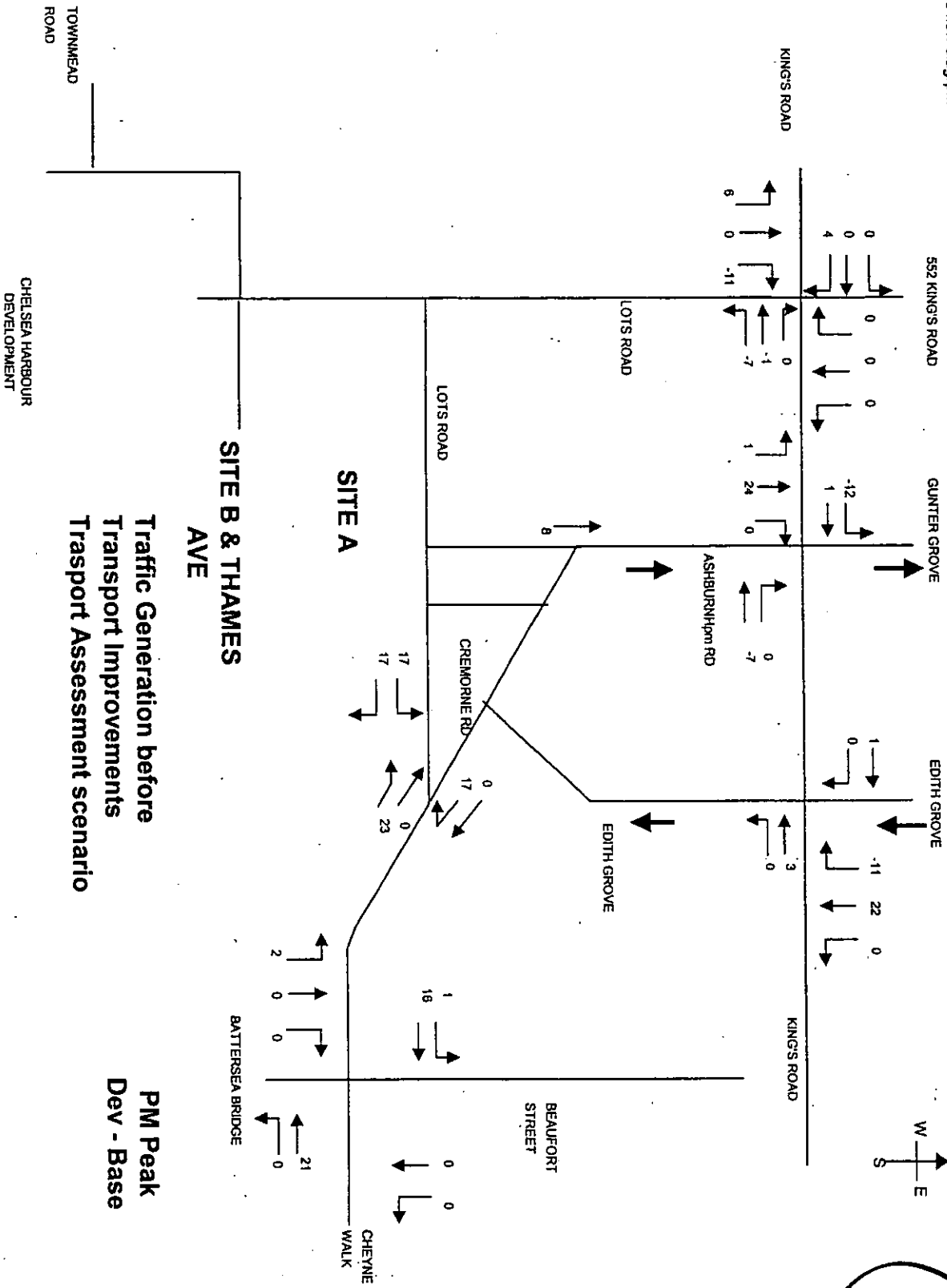


PP Michael Lewin
Sector Director
for Symonds Group Ltd

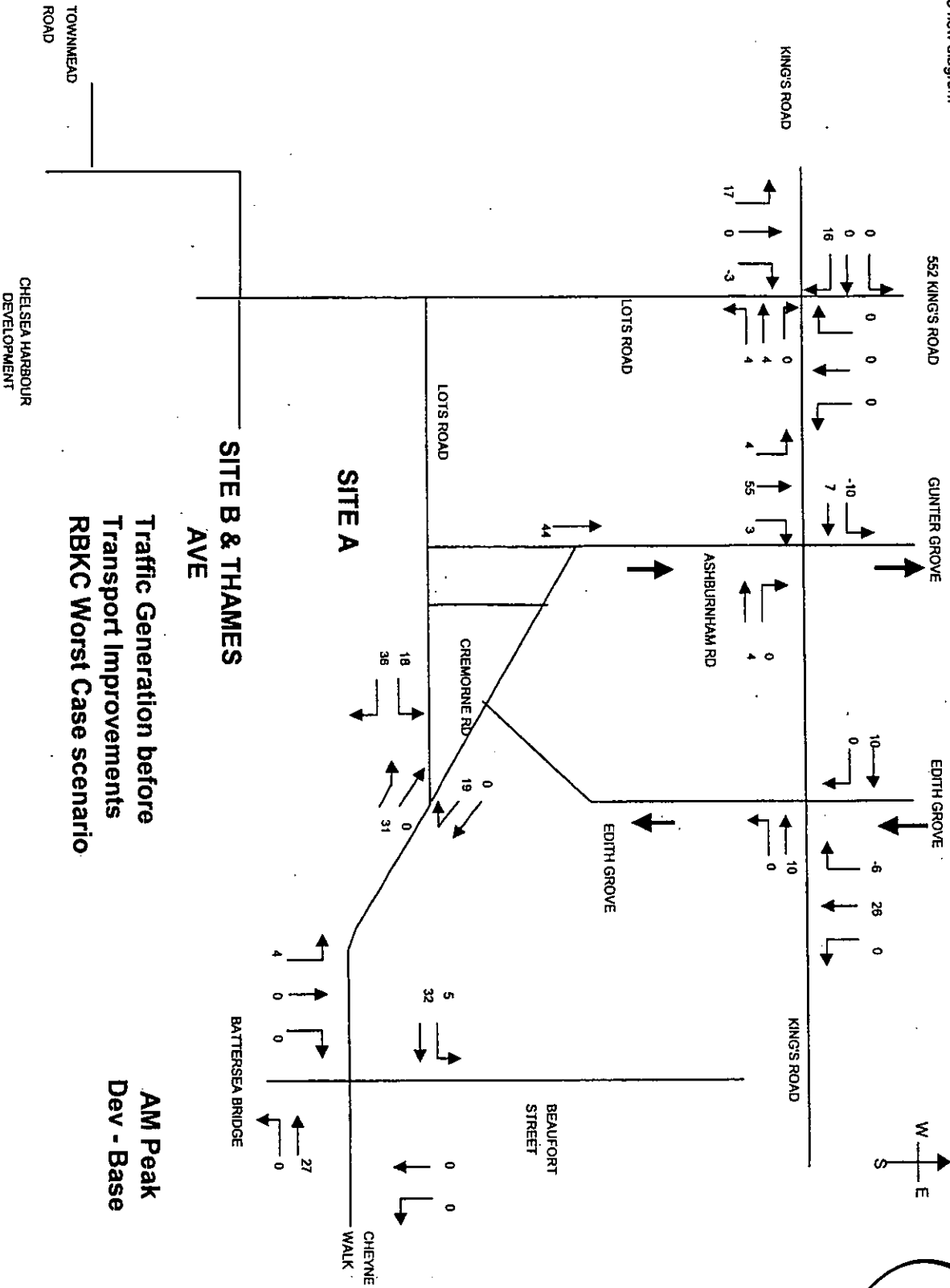
cc Nick Bond – Transport for London
Roger Khana – London Borough of Hammersmith and Fulham



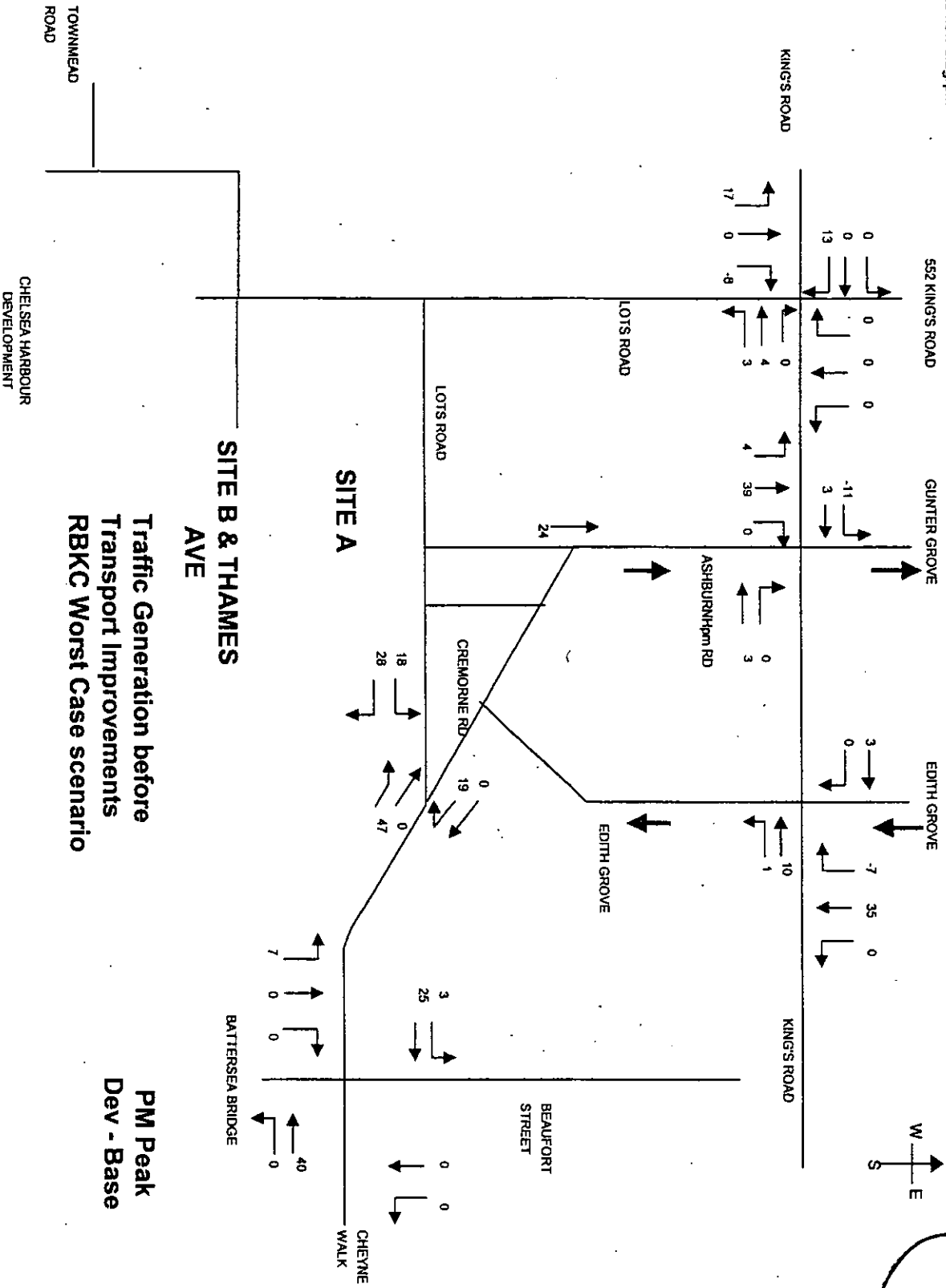
Lot's Road TRANSYT model
Traffic flow diagram



54



Lots Road TRANSYT model
Traffic flow diagram



36



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
THE TOWN HALL KENSINGTON W8 7NX
Tel: 020 7937 5464 Fax: 020 7938 1445

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.	24 JUL 2002				PLANNING	
N	C	SW	SE	APP	IO	REC
			ARB	FPLN	DES	FEEs

crystn

37

64

23 July 2002

Michael French
Executive Director of Planning & Conservation
RBKC

Dear Mr French

Re: Planning Application by Circadian in respect of Lots Road Development

I received the attached letter from Collette Wilkinson of 46 Lots Road SW10 recently.

Whilst your officers may have been copied into this communication I am forwarding it to you in order to ensure that the case officer is aware of all resident's concerns with regard to the revised planning application.

Yours sincerely

Keith Cunningham

Cllr. Keith Cunningham

French, Michael: PC-GrpSvc

From: French, Michael: PC-GrpSvc
Sent: 26 July 2002 14:42
To: Cllr-Cunningham
Subject: Lots Road

JT

38

Dear Councillor Cunningham,

Further to your letter of 23 July with attached correspondence from Collette Wilkinson, I would confirm that this has been passed to the case officer for inclusion in his report.

M. J. French,
Executive Director, Planning and Conservation.
020 7361 2944

JT

PLANNING AND CONSERVATION

THE TOWN HALL HORNTON STREET LONDON W8 7NX

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS

Ms. Collette Wilkinson,
46 Lots Road,
LONDON, SW10 0QF.

Switchboard: 020 7937 5464
Extension: 2944
Direct Line: 020 7361-2944
Facsimile: 020 7361 3463
Web: www.rbkc.gov.uk

26 July 2002

39
THE ROYAL
BOROUGH OF



KENSINGTON
AND CHELSEA

My reference: EDPC/MJF

Your reference:

Please ask for: Mr. French

Dear Ms. Wilkinson,

Lots Road Power Station

Councillor Tim Ahern, Chairman of the Planning Services Committee, has asked me to thank you for your letter of 17 July setting out your objections on the new application for the above site. I can assure you that your comments will be reported to Committee when the application is considered; as it is likely that Councillor Ahern will be chairing that Committee, it would be inappropriate for him to make comments at this stage.

Yours sincerely,

M. J. French,
Executive Director, Planning and Conservation.

c.c. Councillor Tim Ahern – Chairman, Planning Services Committee

0/57

2 Admiral Square
Chelsea Harbour
LONDON
SW10 0UU

14
40

Royal Borough of Kensington and Chelsea
Environmental Services Department
Town Hall
Hornton Street
LONDON
W8 7NX

29 July 2002

Dear Sir

Please find enclosed a copy of the letter that we have sent to the members of the Planning Applications Committee at the London Borough of Hammersmith and Fulham.

Yours faithfully

Sheila Reynolds
Sheila Reynolds

EX DIR	HDC	TP	CAC	AD	CLU	AR
R.B	K.C	1	AUG	2002	PLANNING	
		SW	APP	IO	REC	
		ARB	FPLN	DES	FEES	

2029.



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
THE TOWN HALL KENSINGTON W8 7NX
Tel: 020 7937 5464 Fax: 020 7938 1445

Handwritten: 41 (circled), 57 (circled), and a circled 'P'.

Handwritten: 0/50

Frank Presland Esq.,
9 Chelsea Crescent,
Chelsea Harbour,
London SW10 0XB

30 July 2002

Dear Mr Presland,

Re: Second Planning Application for Lots Road Power Station

Thank you for your letter of 25 July explaining your reasons for objecting to the planning applications by Circadian, for the second time, for Lots Road Power Station. I have noted your remarks, which echo those of many other residents, and have passed your letter to Mr French so that your views may be included in the Report by Officers and made known to the Committee which hears the application.

No doubt, as a resident of Hammersmith and Fulham, you will have made similar representations to that council as well.

I walked round Chelsea Harbour this afternoon to remind myself of the site and saw the avenue of chestnuts adjacent to Admirals Walk which you mention

As it is possible that I may be chairman for that Hearing, you will understand that I am not able to comment on your objections, though I can say that I am very familiar with them.

Yours sincerely,

Handwritten signature: Tony Holt

Councillor Tony Holt
Vice Chairman, Planning Services Committee

cc: Mr M J French, Executive Director, Planning and Conservation



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
THE TOWN HALL KENSINGTON W8 7NX
Tel: 020 7937 5464 Fax: 020 7938 1445

Mr. French

42

/ To go with other observations.

I presume Prof. Polak is writing

Professor Julia M Polak,
Faculty of Medicine, Imperial College,
Chelsea and Westminster Hospital,
369 Fulham Road,
London SW10 9NH.

in her personal capacity, not
on behalf of Imperial College!

WJH

30 July 2002

Dear Professor Polak,

Re: Second Planning Application for Lots Road Power Station

Thank you for your letter of 25 July explaining your reasons for objecting to the planning applications by Circadian, for the second time, for Lots Road Power Station. I have noted your remarks, which echo those of many other residents, and have passed your letter to Mr French so that your views may be included in the Report by Officers and made known to the Committee which hears the application.

As it is possible that I may be chairman for that Hearing, you will understand that I am not able to comment on your objections, though I can say that I am very familiar with them.

Yours sincerely,

Tony Holt

Councillor Tony Holt
Vice Chairman, Planning Services Committee

cc: Mr M J French, Executive Director, Planning and Conservation

43

From: Thorne, John W.: PC-PlanSvc
Sent: 30 July 2002 17:04
To: Bennett, Mark: ES-SSDD; Case, Richard: ES-HwayTraf; Denington, Guy: ES-EnvHlth; French, Michael: PC-GrpSvc; Gajic, Vera: CP-Comm; Hughes, Amanda: ES-EnvHlth; Jackson, John: PC-BlgCtrl; Logan, Stanley: HS-PlanRes; McDonald, David: PC-PlanSvc; Mcgarvey, Joan: ES-SSDD; Morse, Paul: CP-Gov; Nick. Corbett (E-mail); Rust, Tracey: PC-PlanSvc; Souch, Malcolm: PC-PlanSvc; Swinburne, Graeme: ES-HwayTraf; Thorne, John W.: PC-PlanSvc; Turner, Chris: PC-PlanSvc
Cc: Myers, Derek: CP-ChiefExec
Subject: Thursday 8th August

Further to my E-Mail of 4th July, there will be a project team meeting in Committee Room 5 from 10:00 to 12:00 on Thursday 8th August to discuss the new application. If you are in a position to make initial comments on the scheme in writing in advance of the meeting it would be helpful.

The principal objective is to produce an initial written response to the applicants detailing:

- a) Additional information we need in order to determine the application.
- b) Amendments we consider might be necessary in order to address objections to the proposal
- c) Matters we might seek to include within a Section 106 agreement

I want to have this drafted by the end of August.

We will be using consultants to assess the applicants' sunlight and daylight submissions. Use of consultants in relation to transportation matters and design/high buildings is under consideration.

Please call/ E-Mail to confirm your attendance.

John W Thorne

57
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**

Professor Julia M. Polak,
Director, Tissue Engineering & Regenerative
Medicine Centre, Imperial College,
3rd Floor, Lift Bank D,
Chelsea & Westminster Hospital,
369 Fulham Road,
LONDON, SW10 9NH.

Switchboard: 020 7937 5464
Extension: 2944
Direct Line: 020 7361-2944
Facsimile: 020 7361 3463
Web: www.rbkc.gov.uk

31 July 2002

My reference: EDPC/MJF

Your reference:

Please ask for: Mr. French

Dear Professor Polak,

Lots Road Power Station

Councillor Barry Phelps thanks you for your kind letter of 25 July regarding the new application for the above development; however, he is now Cabinet Member for Planning and Conservation Policy and so your letter has been forwarded to Councillor Tim Ahern, Chairman of the Planning Services Committee, for his attention. I would assure you that your objections will be very carefully considered and reported to the Committee when the application is determined.

Yours sincerely,

M. J. French,
Executive Director, Planning and Conservation.

c.c. Councillor Tim Ahern – Chairman, Planning Services Committee.
Councillor Barry Phelps – Cabinet Member for Planning and Conservation Policy

JT

French, Michael: PC-GrpSvc

From: French, Michael: PC-GrpSvc
Sent: 01 August 2002 14:20
To: 'Terence Bendixson'
Subject: RE:

0/5-45

Dear Mr. Bendixson,

Thank you for your e-mail of 31 July setting out your Society's objections to the above development. These will be carefully considered and reported to Committee when the application comes to be determined.

M. J. French,
Executive Director, Planning and Conservation.
020 7361 2944

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

From: Terence Bendixson [mailto:tbendixson@onetel.net.uk]
Sent: 31 July 2002 18:14
To: michael.french@rbkc.gov.uk
Subject:

Dear Mr French

I attach the Chelsea Society's submission on the Lots Road Power Station proposals. A summary is set out on page two.

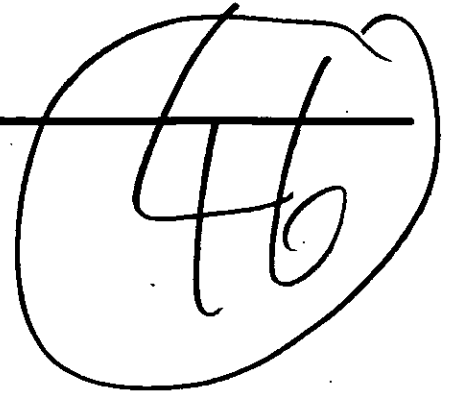
Yours sincerely

Terence Bendixson, Hon. Secretary Planning
The Chelsea Society
c/o 39 Elm Park Gardens, London SW10 9QF
Tel & Fax 44 (0)20 7352 3885

2034

Thorne, John W.: PC-PlanSvc

From: Corbett, Nicholas: PC-PlanSvc
Sent: 01 August 2002 11:52
To: Mcdonald, David: PC-PlanSvc
Cc: Thorne, John W.: PC-PlanSvc
Subject: Lots Road Power Station



.David

I had a quick look through the revised application but my observations remain as previously given, see attached document.

I would add that reducing the height of the tower does not ameliorate the problems previously raised. The towers would shatter the prevailing uniformity of building height fronting the river in this area, a uniformity which makes the towers of the power station appear all the more dramatic, this existing composition would be broken.

Large scale coloured drawings are required of the proposed towers to assess their architectural qualities.

I can see no clear rationale for the major new development beside the north-eastern corner of the power station. For example, why have they gone for this shape and layout of building? Alternative options should have been developed as part of the environmental impact assessment. It may have been better to include a crescent form of development block here with frontages facing the power station, creek and river, and a traditional frontage onto Lots Road, this would mirror the crescent form of development on the other (LBHF) side of the creek.

The development as proposed here includes a power station plaza which is in danger of being too heavily enclosed, it may feel more like an atrium (the coloured illustration looks like something from the 1960's!). The repetitive elevation treatment of the new build appears monotonous and the east elevation (which might be more highly visible sometime in the future) is brutal. My concern is that the proposed development here will appear as a single massive, irregularly shaped building. The drawings provide no ground level detailing to show active, visually permeable frontages. The architecture and layout has more of the feeling of an estate than a new piece of town.

I suggest that axonometric drawings are required to show how the public spaces will work in three dimensions.

A practical point, the drawings should be titled, so you don't need to open them all up when looking for something in particular.

Hope this helps!

Nick



Lots.obs.doc



Lots.obs.doc



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
THE TOWN HALL KENSINGTON W8 7NX
Tel: 020 7937 5464 Fax: 020 7938 1445

347

Susie Brookes,
17 King's Quay,
Chelsea Harbour,
London SW10 0UX.

1 August 2002

Dear Susie Brookes,

Re: Second Planning Application for Lots Road Power Station

Thank you for copying to me your letter of 28 July to Mr Entwistle of Hammersmith and Fulham explaining your reasons for objecting to the planning applications by Circadian, for the second time, for Lots Road Power Station.

I have noted your remarks, which echo those of many other residents, and have passed your letter to Mr French so that your views may be included in the Report by Officers and made known to the Committee which hears the application.

I walked round Chelsea Harbour yesterday afternoon to remind myself of the site and saw the avenue of chestnuts adjacent to Admirals Walk which is causing much comment.

Yours sincerely,

Tony Holt

Councillor Tony Holt
Vice Chairman, Planning Services Committee

cc: Mr M J French, Executive Director, Planning and Conservation



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
THE TOWN HALL KENSINGTON W8 7NX
Tel: 020 7937 5464 Fax: 020 7938 1445

48

Keith Hodgkinson Esq.,
25 The Quadrangle,
Chelsea Harbour,
London SW10 0UG.

1 August 2002

Dear Mr Hodgkinson,

Re: Second Planning Application for Lots Road Power Station

Thank you for your letter of 26 July with copy of your letter to the planning officers at Hammersmith and Fulham explaining your reasons for objecting to the planning applications by Circadian, for the second time, for Lots Road Power Station.

I have noted your remarks, which echo those of many other residents, and have passed your letter to Mr French so that your views may be included in the Report to Committee by our Officers and made known to the Committee which hears the application.

I walked round Chelsea Harbour yesterday afternoon to remind myself of the site and saw the avenue of chestnuts adjacent to Admirals Walk which is causing much comment.

Yours sincerely,

Tony Holt

Councillor Tony Holt
Vice Chairman, Planning Services Committee

cc: Mr M J French, Executive Director, Planning and Conservation



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
THE TOWN HALL KENSINGTON W8 7NX
Tel: 020 7937 5464 Fax: 020 7938 1445

S. Maherali,
33 The Qudrangle,
Chelsea harbour,
Lonfon SW10 0UG. .

1 August 2002

Dear S. Maherali,

Re: Second Planning Application for Lots Road Power Station

Thank you for your letter of 25 July explaining your reasons for objecting to the planning applications by Circadian, for the second time, for Lots Road Power Station.

I have noted your remarks, which echo those of many other residents, and have passed your letter to Mr French so that your views may be included in the Report by our Officers and made known to our Committee which hears the application.

I walked round Chelsea Harbour yesterday afternoon to remind myself of the site and saw the avenue of chestnuts adjacent to Admirals Walk which is causing much comment.

Yours sincerely,

Councillor Tony Holt
Vice Chairman, Planning Services Committee

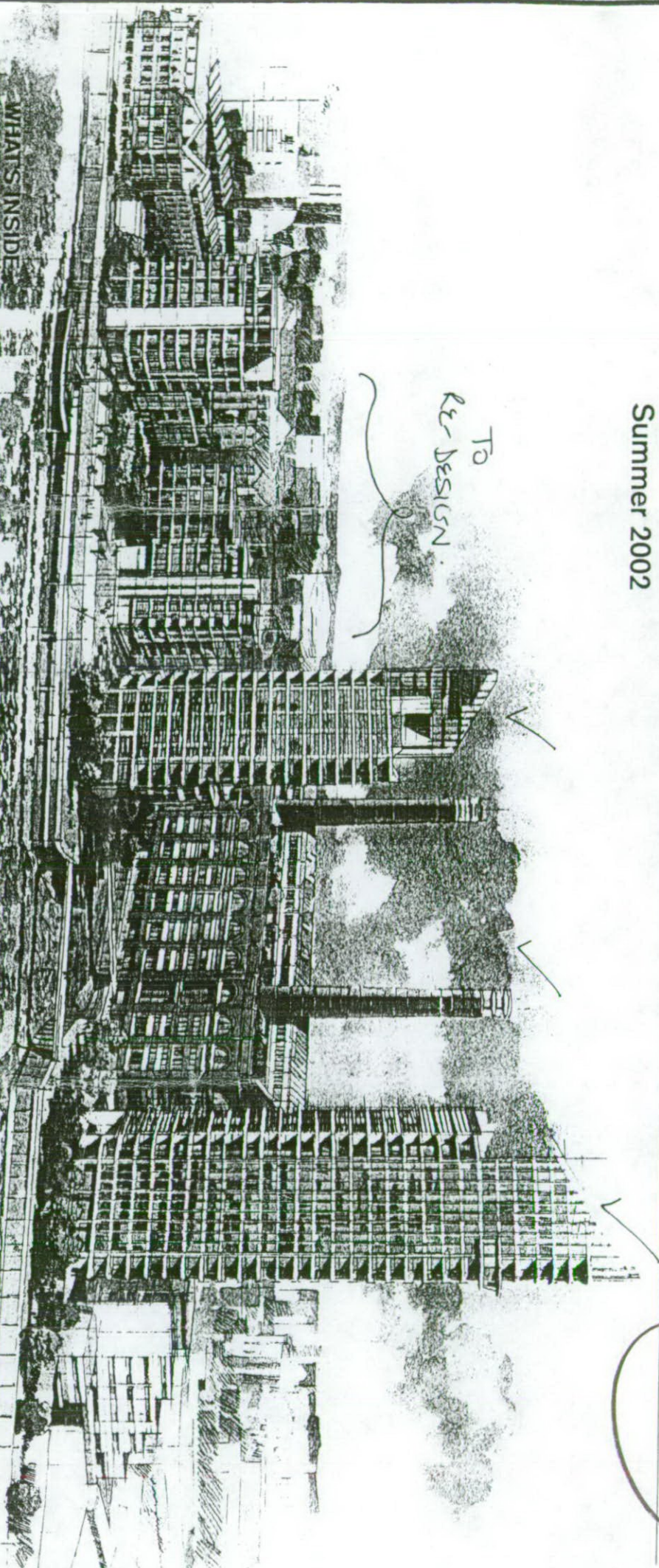
cc: Mr M J French, Executive Director, Planning and Conservation

lots road news

Summer 2002

50

To
Re-DESIGN



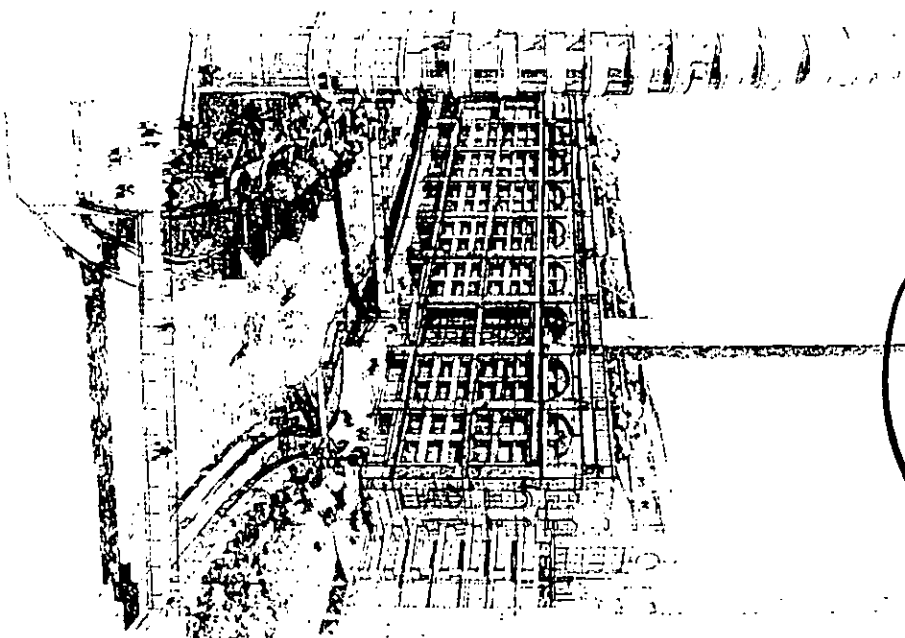
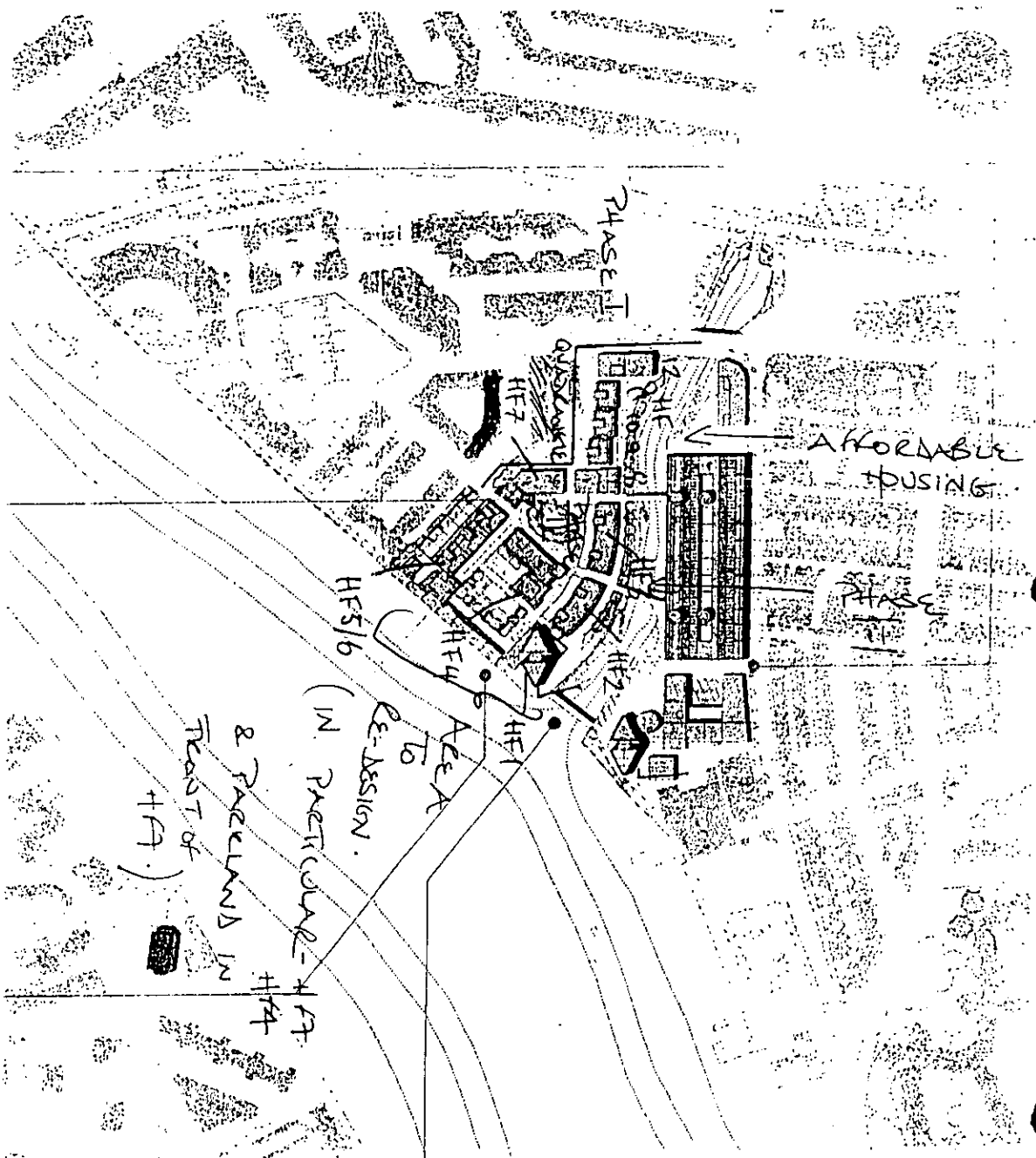
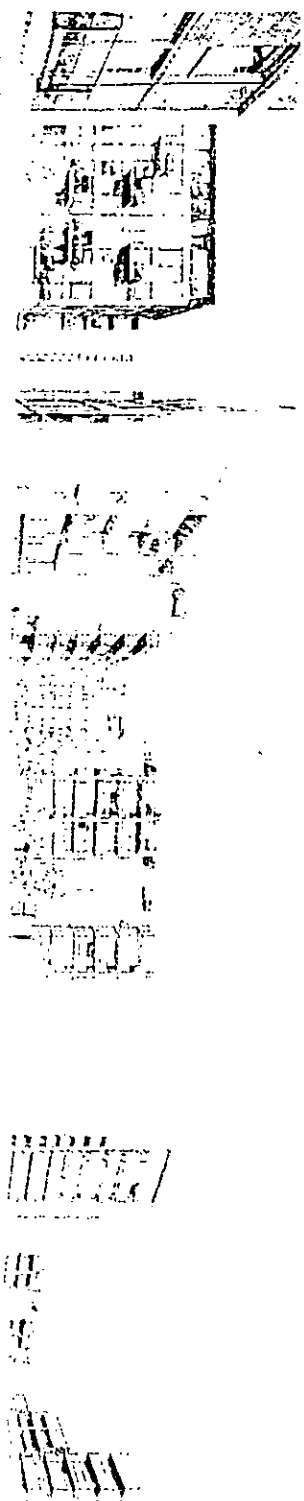
WHAT'S INSIDE

THE NEW SCHEME EXPLAINED

- traffic and transport
- public open space
- height and density
- affordable housing
- mixed use scheme

NEW SCHEME AT A GLANCE

- facts and figures
- Lots Road area gains



51

24.000

For left corner Station Plaza

to now

length 100 ft