

**ROYAL BOROUGH  
OF  
KENSINGTON & CHELSEA**

**DOCUMENT SEPARATOR**

**DOCUMENT TYPE:**

**PUBLIC COMMENT**



**\*PBC\***

HAMMERSMITH AND FULHAM HISTORIC BUILDINGS GROUP

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

18<sup>th</sup> February 2003

Dear Mr French,

**Lots Road Power Station, Lots Road, Chelsea SW10**  
DPS/DCSW/PP/02/01324&1325/JT

I write on behalf of the Hammersmith and Fulham Historic Buildings Group to object to the third application for redevelopment of Lots Road Power Station site.

We have studied the revised application and regretably do not find that the changes to the proposals meet our objections to the intensity of the development; the height, scale, massing, siting and relationship of buildings to existing buildings, to the River and to the Creek; provision of public open space, uneighbourliness to existing homes; lack of river related uses and encroachment into Chelsea Creek.

I enclose a copy of our letter to the LBH&F which details our objections. We ask you to take them into account in your consideration of this application. We are not familiar with your UDP but the issues transcend the boundary between our two Boroughs. For example open space provision in LBH&F will effect residents in both Boroughs, the Creek is a shared natural asset, the Power Station is a key element in views from along and across the River and an appropriate river related use would benefit residents in both Boroughs. We very much hope the two Boroughs can work together on proposals for this site.

We ask your Council to refuse this planning application in its present form. We hope a more acceptable scheme can be negotiated taking into account the requirements of RPG3B/9B, the Boroughs' UDP policies and the advice of the Thames Strategy Kew to Chelsea. Please keep us informed of any revisions

Yours sincerely

Angela Dixon, MA honMRTPI  
Chairman  
c West London River Group  
Lots Road Action Group  
Chelsea Society

# HAMMERSMITH AND FULHAM HISTORIC BUILDINGS GROUP

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Stephen Moralee  
Head of Development Control  
London Borough of Hammersmith & Fulham,  
Town Hall  
King Street  
London W6 9JU

att: Paul Entwistle  
apl:2002/03132/FUL  
our ref: Area18  
date: 18.2.2003

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Dear Mr Moralee,

## **Lots Road Power Station and Thames Avenue SW10**

I write on behalf of the Hammersmith and Fulham Historic Buildings Group to object to the above revised application for redevelopment of Lots Road Site.

We wrote to you on 3.3.2002 and 29.7.2002 objecting to the previous schemes for this site which were both subsequently refused by the LB of Hammersmith & Fulham (LBHF). The Royal Borough of Kensington and Chelsea (RBK&C)) has refused the first application and not yet determined the second one.

We have studied the revised application and whilst there are some improvements, regrettably do not find that the changes to the proposals meet our objections to the intensity of the development; the height, scale, massing, siting and relationship of buildings to existing buildings, to the River and to the Creek; quantity and quality of open space; uneighbourliness to existing homes; lack of river related uses and encroachment into Chelsea Creek.

There are other important issues particularly traffic and educational provision and community benefits which we will leave to our colleagues in the LRA, and other groups to deal with.

## **1. POLICY BACKGROUND**

1.1 Lots Road is in the **Thames Policy Area**. As a result of the recent review of CA boundaries the Riverside and Creekside in LBH&F are in now in the **Sands End Conservation Area**. It is also adjacent to the **Thames Conservation Area** in RBKC.

1.2 **Site 22 in the LBH&F UDP 1994** (and the revised UDP 2001) identifies Chelsea Creek as part of a Nature Conservation Area of Metropolitan Importance. **Site 22A** in the Revised UDP covers the whole of the application site in LBH&F. The Inspector in his UDP report considered that site 22A should be modified by:

- 'Identifying the amount and type of public open space required and indicating that this must be in a location that has a visual and physical relationship with the Nature Conservation Area' and by

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- 'Adding that River related facilities in connection with the open space and River Walk provision would be welcomed'

### 1.3 **RPG3B/9B**, the Strategic Guidance for the River Thames

- para 2.10 refers to the desirability of collaboration across Borough boundaries
- para 2.11 summarises the policies for a riverside site such as Lots Rd. including an overall objective 'to protect and enhance historic buildings, sites, structures, landscapes, skylines and views of importance'
- Para 3.13 states the importance of retaining the varied and distinctive character of individual reaches of the Thames.
- Para 3.36 states that the river and its related open spaces form the backbone of London's open space framework

1.4 **The Thames Strategy 1995** states 'Chelsea Harbour with its tall building is an important contemporary landmark on the river' (page 38).

1.5 **The CA Profile for Sands End CA** states para 5.3 'The main feature within the CA and the principal elements in defining its character are the river itself, the river bank and views along and across the Thames.'

1.6 **The Thames Strategy Kew to Chelsea 2002 (TSKtoC)** includes Chelsea Creek and the Lots Rd site in Character Reach 7 (4.76-89). It recognises that

- 'Chelsea Creek is a major opportunity site for riverside restoration, new uses and improved links' (4.78)
- 'Development of the remaining land at Chelsea Harbour should seek to improve public access to the river and should make provision for public open space. Development should include provision for the enhancement of Chelsea Creek.' (4.88)
- 'Chelsea Harbour illustrates issues of practical public accessibility in large residential developments' (4.78)
- Chelsea Harbour's 'full potential has not yet been realised....This is partly due to the lack of a coherent network of pedestrian and cycle routes ...Redevelopment of the Lots Road Power Station should provide for improved linkages' (4.87)
- The importance of Industrial Heritage (3.21-23)
- 'The Belvedere Tower of Chelsea Harbour is an important landmark' as is 'The two chimneys of the Power Station' (4.87)
- 'The siting of future landmark buildings should take into account: the character of the reach; identified important local views/prospects; local landmarks; and the setting and skyline of historical waterfronts.' (3.38 Policy Recommendation VL8)
- 'Existing vegetation is limited, small scale and should be reinforced. Species of a more appropriate size should be utilised.' (4.88)
- 'The treatment of the River Walk will be an important consideration in the development of Lot's Road Power Station, the final phase of Chelsea Harbour and the treatment of Chelsea Creek.' (4.89)

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- The environmental value of Chelsea Creek should be protected and the potential for new wetland habitats investigated. These could form part of a green chain extending up to the Brompton Cemetery.' (4.89)

1.7 **The Draft London Plan 2002**, Annex 2 (page 301), The Blue Ribbon Network, reinforces these River policies.

## **2. HISTORIC BACKGROUND**

2.1 The Lots Road site is part of a wider **historic area of industrial heritage** which includes the whole of the original Imperial Gas Light and Coke Co Site in Sands End, the railway, Chelsea Basin, the Kensington Canal and Chelsea Creek as well as the Lots Road Power Station itself. This area is an important part of London's riverside industrial heritage, a reminder of the time when the Thames was primarily a working river, bordered with a variety of factories, breweries and other industrial works for which the river not only supplied water but was also essential for the transport of raw materials such as coal and finished products.

2.2 **The Sands End area** was established as a site for the production of town gas in 1823, some ten years after gas was first used for street lighting. The original owners, the Imperial Gas Company, (later the Imperial Gas Light and Coke Company), were London's second oldest gas company. Gas holders remain, including a listed one said to be the oldest remaining gas holder in the world along with associated buildings, Imperial Square, built for the gasworkers, and the dock.

2.3 **Chelsea Creek** was originally fed by a 'lost river', known as Counter's Creek, which started with a spring on Little Wormwood Scrubbs (still visible under certain conditions). The lower part of this watercourse was widened and straightened to form the **Kensington Canal** which opened in 1828. It led from a basin near Warwick Road to the Thames at Chelsea Creek. The canal was sold and later most of it became the route of the railway.

2.4 **The Imperial Gas Light and Coke Co Dock c 1862** is linked to Chelsea Creek by a channel under the railway. This dock was originally used for delivering coal to the gasworks. The sturdy walls topped by great granite slabs with bollards, iron steps down to the water and the linking channel under the railway embankment together with the later sluice gate through under the railway embankment to Chelsea Creek remain. This enabled coal barges coming up the Thames to pass through to the dock.

2.5 **The Embankment wall to the railway, 1861-3** also forms part of the dock walls.

2.6 **Chelsea Basin** which was used for the transport of coal by river and later infilled and used as part of the goods yard. The basin was excavated as part of the Chelsea Harbour development and is now the marina.

2.7 **The Lots Road Power Station** was built between 1902 and 1905 to provide power for the Metropolitan Railway (the present District and Hammersmith and City lines). The engineer was J.H.Chapman, the architect possibly Leslie Green.

2.8 **LCC Lots Rd Pumping Station** dates from 1904 and was designed to prevent the flooding of basements at times of high tide and heavy rainfall. (ES p75)

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### **3. OBJECTION**

#### **3.1 Lots Road/Thames Avenue: Part of a Larger Site**

One of the problems of the Lots Road applications is that the proposed development straddles two Boroughs. RBKC has a planning brief for the site but LBH&F does not. It is crucial that the development and its environmental impact is looked at for the area as a whole irrespective of where the Borough boundary happens to fall. Not only does the fact that the borough boundary goes down the centre of the Creek cause administrative severance but the railway line causes a visual and psychological one with the related Sands End area. It is crucial that any assessment of the proposals looks at the wider area, including the Imperial Wharf development and the existing Chelsea Harbour development.

#### **3.2 The Lot's Road Site: Part of an Important Historic Riverside Site**

The HBG would welcome a suitable redevelopment scheme respecting the historic elements, the CAs, the neighbouring residential areas and the riverside setting. Any scheme should comply with the policies in the H&F UDP, in RPG3B/9B and respect the detailed character assessment and the guidance in the *Thames Strategy Kew to Chelsea*. Regretably the revised proposals still fail to do this.

We hope that even at this late stage the two Boroughs will collaborate on a master plan for the whole Chelsea Creek /Imperial Wharf Area. This should include recognition of the historic nature of the site and a landscape masterplan showing the disposition of open space and the treatment of the Riverside, riverbanks, the Creek and the dock, setting buildings back from the water's edge to allow for generous and user friendly public open space and public realm.

#### **3.3 Overdevelopment**

Overdevelopment is still the basic problem of the present scheme despite some reduction in the number of units, in the height of one of the towers and in an increased set back of buildings from the Creekside. It is on too large a scale, too high, too massive, too near existing development and too near the river and the Creek. It does not respect its context and relate well to the neighbouring residential developments at Chelsea Harbour and the small scale residential streets to the north of Lots Road. We are also concerned that the run of buildings along the Hammersmith side of the Creek combined with the mass of the Power Station will 'canyonise' the Creek (see illustration in *Lots Road News Spring 2003*).

#### **3.4 Tall Buildings**

The two towers do not comply with the LBH&F UDP in relation to height nor with the EH/CABE consultation document on Tall Buildings. The Chelsea Harbour Belvedere and Lot's Road Power station are the two landmarks in this area specifically referred to in the *Thames Strategy Kew to Chelsea* and should not be challenged. The present scheme attempts to 'outlandmark' the existing landmarks. We agree with the English Heritage officers report to

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their London Advisory Committee on the first scheme that 'the current proposals would have a detrimental impact on the setting of the power station which should remain the dominant architectural and townscape focus of the area; and also on views from adjacent conservation areas and open spaces'. Despite some reduction in the height of the towers since the first application the Power Station is still dominated by the new development.

### 3.5 Views

Views are damaged by the excessive height and mass of the towers. We are concerned at the special pleading of the ES appendix C1 dealing with the views. The Power Station is not recognised as an historic asset. No mention is made of the importance of the sky in views. Trees are referred to as hiding a view even though trees, alas, are not permanent features. No mention is made of the difference with deciduous trees between winter and summer. Reference is made to things which are not in the view. When the existing view is altered and views of the power station are blocked the new is invariably preferred to the old on subjective grounds. Some views in H&F are not dealt with at all eg views along the Riverside Walk. We hope the views section of the ES can be reviewed by an at 'arms length consultant' in a less partial way.

### 3.6 The Power Station

The refurbishment and re use of this historic asset is welcomed. Gavin Stamp wrote that this 'Temple of Power' at Lots Road was a 'great brick and glass shed [which] achieved monumental dignity through comparative simplicity' ES page 75.

The ES for previous scheme refers (App C pages 6 & 7 and 11) to the 'impressive grandeur and composition of the building'. The Lots Rd elevation of the frontage has 24 bays compared with 12 on the Creekside, and is scaled down to suit the lower stature of the Turbine Hall. 'One clever aspect of the composition....is that the Lots Rd side sits more comfortably with the adjacent primarily residential development...which predates the construction of the Power Station'.

In the light of the above it is surprising that the Power station is not included in the analysis of Heritage Assets in ES page 76 and dismissed as an historic asset in the views ( ES C1 page 23)

We consider that the '**internally illuminated lanterns**' placed on top of the two remaining chimneys are inappropriate and fussy for this robust and dignified building. When there was an intention to have a viewing platform at the top of a chimney there might have been some case for a 'light cap' but we understand this is no longer planned. We do not agree with the ES page 27 that these 'will reinforce the iconic nature of the building'. Reducing the height of the towers would be the best way of doing that. We hope these additions can be removed from the plan and the silhouette of the building remain unaltered.

### 3.7 Chelsea Creek

The Creek is the only inlet of the Thames remaining in LBH&F. It is designated as part of the Tidal Thames Nature Conservation Area of Metropolitan significance. It is the key natural asset on the site. We are very aware of the problems of possible silting up when Lot's Road Power Station is de-commissioned. The ES (Appendix E page 5) states:

*“Chelsea Creek is a man made tidal canal, 357 meters long from its mouth on Thames to its end adjacent to the West London Railway line. The Creek is approximately 25 metres wide for most of its length, widening on the west side of Lots Road road bridge to form a basin area”*

The ES appears to show (Table 2 page 49) that reducing the Channel width from 25m to as little as 10m is being proposed. Whilst we support the retention of the Creek as fully tidal we are opposed to the solution currently proposed which is in effect encroachment. There should be no invasion of the Creek even if it is below the high water line. It is contrary to the H&F UDP policy on encroachment, and to the draft London Plan Blue Principles and Blue Ribbon Network Annex.

We understand that it would be possible to sink additional borehole(s) to produce a greater flow of water. This is a large site and we have been advised that the costs of sinking additional bore hole(s) is relatively cheap compared with the value of the site. Solutions other than narrowing the bed of the Creek should be investigated.

### **3.8. Retreated Flood Defences**

We welcome the idea of retreating the flood defences and replacing the vertical walls of the Creek with inter-tidal terraces for nature conservation and landscape improvement. However these terraces should be set back into the site not encroach into the Creek which is existing public open space. (See PPG17 Annex:Definitions 1. water as open space.)

The ES speaks of maintaining the existing flood storage capacity. The Lots Road Scheme provides a major opportunity to increase the flood storage capacity at a time when there is widespread concern about flood risks.

Retreating the defences into the site would contribute to the landscaping of the site as part of the new public open space, reduce the canyonising effect of the buildings along the Creekside and provide additional flood capacity. On a site of this scale this should be a required as planning gain.

### **3.9. Chelsea Creek Project**

The Chelsea Creek Project is included in the *Thames Strategy Kew to Chelsea* page 6.15 –7.2 as a recommended project and it has been presented to LB H&F and RBK&C, Circadian and St George. It puts forward the proposition that the Imperial Wharf Dock and the infilled part of the Creek north of the basin up to the Kings Road should be excavated and restored as water bodies with access for boats. We have been advised that this is a practical proposition.

The precautionary principle should be applied and nothing allowed on the Lots Road site which could frustrate this happening in the future. Please see our suggested condition no 9 attached.

We are concerned that the narrowing of the Creek and the raising of the bed levels as currently proposed as well as the proposal for an ‘ecology park’ in the Creek basin adjacent to the railway embankment could jeopardize any future opening up of the Creek for boats both through to the Imperial Wharf Dock and up to the Kings Road.



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We note that the ES page 103 states that the "*Bridges do not provide additional restrictions to the use of the creek by vessels beyond that already imposed by the Lots Road bridge near the basin*" This should be conditioned as a precaution against later revisions.

**3.10 Misleading Plans and Model.** The plans and models are misleading. They do not show that the Creek continues through under the sluice at the railway embankment and into the remaining part of Imperial Wharf Dock.

We drew attention in earlier letters (8.4.2001 & 29.7.2002) to the fact that the developer's scoping review for the Environmental Statement (ES) wrongly described the Creek (3.4.1) as '*ending adjacent to the West London Railway line.*' This error is repeated in the quotation above from the current ES. During consultation we have repeatedly drawn Circadian's attention to this error and requested that they show the Imperial Wharf dock (both where it is in water and where filled in) on their plans and models. This error has not yet been corrected.

### **3.11 Avenue of Chestnut Trees.**

We object strongly to the felling of one side of the avenue of Chestnuts in Chelsea Harbour, which have TPOs on them and the subsequent loss of existing green open space. The Avenue is an attractive feature, part of the original design of Chelsea Harbour, now coming to maturity. It would be damaging to the Riverside townscape and the character and appearance of the CA to lose them - particularly as there are so few trees in the area.

The Avenue of Chestnuts should be retained. The footprint of the adjacent buildings should be moved back sufficiently both to leave the Avenue intact and allow for the natural growth of the trees. The Borough's arboricultural officer should be consulted as to the amount of clearance needed from the trees to the nearest building/garden wall to prevent future residents having the right to demand pruning of the trees. We have seen this happen so often when new developments are completed and would like the danger designed out at this stage.

### **3.12. Tree Planting**

Far from losing potentially large trees, sites should be sought for the planting of additional native trees associated with the Riverside such as willows, alder and aspen. This could link in with tree planting along the new Riverside Walk to add a link in a green chain along the River from the new Sands End Riverside Park to the Creek and then up to Brompton Cemetery. The Borough's arboricultural officer's advice should be sought at this planning stage to ensure suitable sites are provided and properly prepared. In our experience if tree planting is left as a reserved matter suitable sites are not subsequently available for trees of a size appropriate to such a large development.

### **3.13 Open Space**

Open space provision has been improved in this third application. However concerns remain.

The **definition of open space** needs to be clarified. Hard surfaced access roads and paths may be part of the public realm but are not what ordinary people expect as open space. It is surely unreasonable to claim the **Power Station Street** as open space!

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The **Creekside open space** appears to include the tidal terraces. These are visually open but mostly we understand not accessible. They are welcomed for their contribution to openness and biodiversity but are not a substitute for comfortable, green park type open space for people to use for sitting, sunning and eating their lunch time sandwiches.

The '**Riverside Square**' is very hard landscaped and also over a car park. The proposed venting of the car park through louvres in the front of the steps leading down to the Riverside Walk is unacceptable. This has already been done in some parts of Chelsea Harbour and is alienating and unattractive even when mitigated with low planting as it is in some places there.

The **Microclimate** causes concern. We fear that the effects of the two towers on the microclimate will make the open space unattractive to use - see ES p173 where 'Creekside Gardens' and 'Riverside Square' are rated as having an unacceptable microclimate. The mitigation suggested is unconvincing. We ask that this aspect is carefully examined.

All in all we are concerned that there is **no provision for a soft landscaped public open space** with trees and grass, welcoming, with a sense of privacy and a good microclimate among these large scale buildings: what most people would think of as a local 'park'. We would like to repeat the suggestion in our previous letter that if the Avenue of Chestnuts were retained, a softer landscaped public open space could be provided adjacent to that. This could enable the planting of additional large scale native trees associated with the Riverside, such as willows, alder and aspen.

### **3.14. The Riverside Walk**

The Riverside Walk is not sufficiently detailed. It should vary in width but be at least 6 metres wide - (as recommended by the Thames Strategy Kew to Chelsea Policy Recommendation SD16 page 3.110 and the revised UDP) – and preferably wider. It should be landscaped to encourage wildlife and link in with the new open spaces to extend the green chain/corridor along the Riverside - see above. The River wall and Creekside wall where it will remain, should be included in the design following EA guidelines on riverbank design: '*Riverbank Design Guidelines for the Tidal Thames*'.

We should like to be consulted on details of the design of the Riverside Walk

The Riverside Walk should be opened up for the public as soon as possible in the phasing of any development both here and in Imperial Wharf. This should be given a definite time scale in any section 106 agreement or conditions.

### **3.15 Pedestrian and Cycle links.**

A coherent network of pedestrian and cycle links is highlighted by the *Thames Strategy Kew to Chelsea* as important to the success of the development. These do not seem yet to have received detailed attention. (See TSKtoC Policy recommendations M8-M11 page 3.91). There is an opportunity to create a pedestrian route under the railway alongside the Creek to Imperial Wharf and across the River by, for example, adding a pedestrian link to the railway bridge (TSKtoC page 6.14 ref 6.14). This was highlighted in the Chelsea Creek Project.

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There is an opportunity to provide truly segregated cycle routes in this development so that the Riverside Walk which is part of the Thames Path National Trail, a long distance route for walkers, remains a footpath. Since Chelsea Harbour does not allow cycling, which will presumably be enforced by their security staff, providing a dedicated cycle route through the development will be in the interests of cyclists as well as pedestrians.

### **3.16. The Railway Embankment Wall**

This is, we realise, in a different ownership but as we said in our letter on Imperial Wharf dated 12.4.1999 provision should also be made in adjacent development proposals for the sensitive maintenance of this Victorian embankment wall as planning gain.

### **3.17 River Access and River Use**

There is no satisfactory provision for a new **river access or river related facilities** as supported by the Inspector's comments on the UDP site policy. Indeed the ES states that the existing use of the Creek for canoeing will be unlikely to continue (ES page 113):

*"It is unlikely that the Creek will be suitable for continued training purposes by members of Westminster Boating Base and Cremorne Riverside Centre during the construction phase for safety reasons nor at low tide once operational as the 'rapids' effect will no longer occur. Included in the design of the lower Creek terraces are flat areas that could be used at low tide as temporary resting of small dinghies and canoes. Other safety features and safe points of access and egress to the creekside path will be provided."*

The Creek is in the Sands End CA and the sporting use by canoes is part of the character and appearance of the CA (see photos in Chelsea Creek Project Brochure).

Such an important riverside site as this should include facilities for recreational use of the River. The minor proposals listed above are quite inadequate. The developers should be required to replace the lost provision and make additional provision for river use. At the moment there is a wasted opportunity.

### **3.18 The Section 106 Agreement**

This should include safeguarding of the possibility of opening up the Creek and the dock where they are currently infilled. It should cover public pedestrian and cycle routes, and enhanced river use. Safety equipment should be provided on the Riverwall (eg chains and ladders etc) and maintained long term. The Agreement should include an undertaking by the developer not to sell more than a specified proportion of the commercial dwellings until the Riverside Walk, public open spaces and pedestrian and cycle routes are completed and available for public use. We should like to be consulted on the scope of any section 106 agreement.

**3.19 Conditions.** If the Council is minded to give permission we enclose a list of requested conditions.

## **CONCLUSION**

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We ask the Council to refuse this planning application in its present form as contrary to policies in the UDP, inappropriate for its Riverside setting and damaging to the character and appearance of the Sands End CA. We hope a more acceptable scheme can be negotiated taking into account the requirements of RPG3B/9B and the guidance of the *Thames Strategy Kew to Chelsea*.

Please keep us informed of any revisions

Yours sincerely

Angela Dixon  
Chairman

c WLRG  
LRAG

**HBG Suggested Conditions - Lots Road Thames Avenue**

If the committee is minded to grant permission for this proposal the Group asks that as with previous historic buildings which have been demolished or altered (eg Sherbrooke School, part of the West London Hospital, part of the Swan triangle, FFC and recently the Fulham Broadway LTE Station site and 190 Shepherd's Bush Road.) the following should be arranged either by condition, in the section 106 agreement.

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1. There should be no demolition or alteration of the buildings before a building contract for the restoration and adaptation of has been entered into and there is an agreed start date and programme for the works to avoid premature demolition.
2. In conjunction with English Heritage a photographic and written record is made of all the buildings - including the Creek itself - before any demolition or alteration. A copy of this should be lodged with the Borough Archives.
3. Any historic detail from the demolished buildings will be incorporated in the new scheme
4. Historic continuity should be maintained in the naming and dating of the new development as specified in the Standard Broad Design Guidelines for CAs. The Borough boundary should be indicated in a suitable way.
5. Commemorative plaques or sign boards with information on the history of the area including the Power Station and Chelsea Creek should be incorporated in an appropriate place where they can be seen by the public as has been conditioned for 192 Hammersmith Road and The Hammersmith Palais. The HBG would be pleased to help with the information for the plaques in association with the Borough's Archive Dept. (We are currently researching an appropriate form of plaque for such historical information.)
6. There should be an archaeological investigation in conjunction with EH.
7. If there are any archaeological finds on the site an opportunity should be found for the Archive Dept and other interested Groups to view them on site before they are removed and/or building work starts. (note often we – and the archive dept and the case officer - only hear about this when it is too late to view.)
8. An ecological analysis should be made of the site before any clearing starts. Provision should be made for replacement habitat.
9. The section 106 agreement should confirm that the Creek will be kept open and sufficiently wide and deep for the passage of boats up the Creek and into the Imperial Wharf Dock and also confirm the right of navigation through to the dock.



Garden at Giverny  
an original watercolour  
by Trevor Waugh

TW079

Price Code

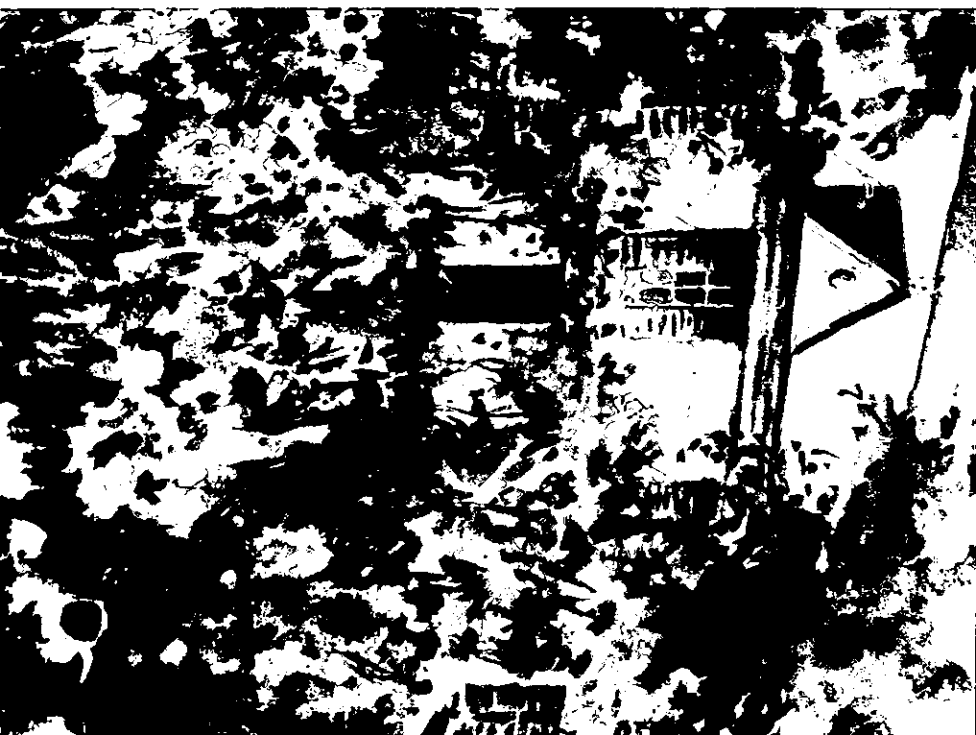


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13 Tetcott Road,  
S.W.10. 0NA.  
276/19.2.03  
(80)

Dear Sir/Madam,

I continue to be opposed to the Lots Road Power Station development despite the revised plans.

The area does not need further offices / shops

and the increased traffic that this will bring - One 25 story + one 37 story tower will spoil the view along the river and bring additional traffic to already congested roads.

Yours faithfully,  
Paula Matthews.

② JT  
q/JT (277)

**French, Michael: PC-GrpSvc**

**From:** French, Michael: PC-GrpSvc  
**Sent:** 20 February 2003 12:59  
**To:** 'Angela Dixon'  
**Cc:** Thorne, John W.: PC-PlanSvc  
**Subject:** RE: Lots Road 3rd Planning Application

Dear Ms. Dixon,

Thank you for your letters regarding the above planning application. I have passed these through to Mr. Thorne, the Area Planning Officer, for consideration and reporting before any decision is taken on the application.

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

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

**From:** Angela Dixon [mailto:dixon.angela@talk21.com]  
**Sent:** 18 February 2003 20:02  
**To:** RBKC - Michael French (E-mail)  
**Cc:** RBKC - John Thorne (E-mail)  
**Subject:** Lots Road 3rd Planning Application

Dear Mr French,

I attach a letter of objection to the Lots Road application from H&F Historic Buoldings Group  
Best Wishes  
Angela Dixon



## The Redevelopment of Battersea's Riverside

Battersea's riverside runs from Wandsworth Bridge in the west to Vauxhall Bridge in the east. The land was, until comparatively recently, almost entirely used for industry. The opposite bank, from Wandsworth Bridge to Lots road power station, was a mirror image in terms of use. All this provided splendid romantic views of a decaying industrial landscape from the Chelsea bank. Alas no sight of the river from the Battersea side with the exception of St. Mary's Churchyard and Battersea Park.

The decline of industry and the subsequent redevelopment of the land offered a tremendous opportunity. The chance to develop the riverbank in ways that provided visual excitement, together with uses that benefit the public at large. What has happened so far?

One of the earlier developments was Whistler's Walk on the site of Morgan's. A factory, creating a real sense of drama and a strong visual presence, was replaced by a walled suburban residential enclave with a token riverside path. Subsequent developments have all been on a much more urban scale, nearly all high cost residential fortresses and all providing no more than the riverside path for the general public.

The area between Wandsworth Bridge and the site of Price's candle factory has now been largely rebuilt. Gargoyle Wharf will complete this stretch of the riverbank with end-to-end same height buildings. The only relief from this dreary procession is, a rather eccentric tower at Plantation Wharf.

The Lombard Road area has been cleared ready to extend the procession to the railway bridge. Further down river next door to St Mary's Church is a rather more interesting development. Montevetro caused far more controversy than any of the other developments so far mentioned with the possible exception of Gargoyle Wharf. The building occupies the site of a large flour mill next to St. Mary's churchyard, it has upset many people who feel that it is too big and too close to the church. This may be so but the building and the church viewed from the opposite bank makes an elegant composition and the well-used public space on the riverside is more imaginative and generous than elsewhere.

Down river past Whistler's Walk Albion Riverside is nearing completion. It remains to be seen if this development provides the 'vibrant' centre of activity the architect envisages. Past the Park we come to the sad wreck of the power station. Finally the development next to Vauxhall Bridge that is so vulgar it makes the M16 building look understated.

The above sketch of Battersea's Riverside leads us to the most significant development of the moment; the Lots Road site. It brings us back to the subject of romantic views. For Battersea residents the most important impact that the proposed development will make is purely visual. The developers state that 45% of the site is designated as public open space. To achieve this ratio the scheme includes two towers, one of 25 stories the other of 37 stories. This is the factor that is likely to cause the most concern to Battersea residents, a dramatic alteration to a view they have become accustomed to over a number of years.

The big question is, should these two tall buildings be a cause for concern? As we have indicated the river view has undergone dramatic change throughout the last century. Is it not possible that the towers will provide a dramatic shift of focus, compensating for the old working power station with its plume of smoke.

The scheme as a whole with it's mixed use and open public space is far more positive and ambitious than anything on the Battersea side. We hope there is not a timid compromise and look forward to a new view from the bridge.

Brian and Cynthia Newman

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1997

(49)

34 UVERDALE ROAD  
LONDON  
SW10 0SR

(279)

21-02-03

MR M. FRINCH  
Executive Director  
Planning and Conservation

2/55

RBK-C  
THE TOWN HALL  
HOLTON ST.  
LONDON  
W8 7NX

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R.B.					
K.C.	27	FEB	2003	PLANNING	
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Dear Sir,

Lots Road Power Station

I wrote to you last week in connection with the proposed development plans for the above site. Following the refusal of consent to the first planning application I would like to comment on the current proposals:-

1. One of my concerns has always been the insufficient provision of parking facilities. The current plans show that there will be 241 less spaces than was previously proposed. Unless the public transport system is completely transformed in relation to this area, the reduction in parking spaces will prove disastrous.

2. Re two towers, from which a total of 2 storeys

cont...

have been removed, remain inappropriate for this area. They would not enhance the skyline and their design is detrimental to the character of the existing location.

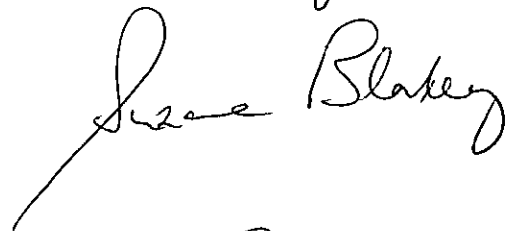
3. The area in which the development will take place is not large enough for the density of the proposed buildings. Taking into account the Imperial Wharf development and that in the old King's College, the Lots Road area is unable to cope with yet another high density development.

This locale is a backwater which has been ignored in terms of public transport for decades and is not able to support the developments which are currently under construction. Without significant investment in the road system and public transport, the developers of this site should not be allowed to construct such a massive development, walk away with their profit and leave those of us who live here to cope with the devastation which they will leave behind.

cont...

I would be grateful if you would advise me of any further matters relating to this proposal in due course.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Suzanne Blakey'.

SUZANNE BLAKEY



A Registered Charity

EX DIR	HDC	TP	CAC	AD	CLU	AO
R.B.	25 FEB/2003		SISTERS OF THE CROSS AND PASSION			
K.C.			7, Stadium Street			
			London SW10 0PU			
			020 7 582 6013			
N	C	SW	SE	APP	IO	REC
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ST  
25  
24 Feb 2003

Proposed Development: Lots Road Power Station  
Lots Road SW10.

0/ST  
Dear Sir,

I write regarding the revised application for the Lots Road Power Station.

I object to the latest proposals. They represent a significant departure from the Council's Unitary Development plan without any reasoned justification.

They will cut out the sunlight and daylight in the area, because of the height and bulk of the development.

This development won't fit in with the current quiet residential aspects of the local area.

Above all, I object because this development will result in more traffic than the existing roads can cope with. Parking on the road and within the proposed development would be totally inadequate as it doesn't meet the present need for residents' parking in this area as far more permits are issued than parking places available.

Yours sincerely,

Sister Marcella Roe

992.



bk in + pc acc 3JT,

(4)

**London and Middlesex Archaeological Society**  
Archaeology Local History Historic Buildings  
20 Highcombe Close, Mottingham, LONDON SE9 4QJ  
Tel: 020 8325 3346

Planning and Conservation  
The Town Hall  
Hornton Street  
LONDON W8 7NX

Your ref: DPS/DCSW/PP/02/01324 and 1325/JT

23 February 2003

For the attention of Tracey Rust (Planning Information Office)

Dear Madam

**Re: Lots Road power Station, Lots Road, Chelsea SW10**

We act as agents for the Council for British Archaeology and in order to give this proposal our full consideration we need a copy of drawing LRTW 4/PA-04/01 which we will return to you following our next committee meeting on 6 March 2003.

Yours sincerely

**John E Clark**  
**Hon Secretary**  
Historic Buildings &  
Conservation Committee

File/1080

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(43)

Odile Jackson, 9A Burnaby Street, London, SW10 0OR

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

Dear Sir,

0/5

EX	HDC	TP	CAC	AD	IC	AC	AC
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R.B.		24 FEB 2003		PLANNING			
K.C.							
N	C	SW	SE	APP	IN	REC	
				ARB	PLS	DES	TEES

**RE: Proposed development to Lots Road Power Station, Lots Road, SW10**

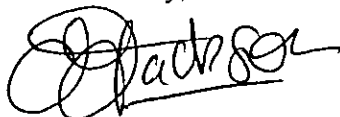
I am writing regarding the revised application for redevelopment of the lots Road Power Station.

I still object to the latest proposals. They represent a significant departure for the Council's Unitary Development Plan without any reasoned justification. In particular:

1. The proposed development will be likely to result in more traffic than the existing roads can cope with, especially taking account recent and proposed development on adjoining and nearby sites. There is **NO** transport infrastructure to cope with the likely traffic. There is **NO** train or underground service. Parking (including parking for visitors and services) will be inadequate.
2. There will be noise and disturbance from the proposed commercial use of the development especially in the servicing and supply of goods to shops and food outlets through narrow residential streets in unsociable hours.
3. The proposed high building is not appropriate for the location. It would be harmful to the skyline and detrimental to the character and appearance of the area and to important views from neighboring conservation areas and open spaces.
4. The height and bulk of the proposed development would result in a loss of sunlight and daylight in the area, as well as a loss of privacy. It would also add a sense of enclosure to residential properties of the neighborhood, which are all low rise.
5. The height, massing, orientation, bulk and design of the development mean that it would not be well integrated into the surrounding area. This would be detrimental to the character and appearance of the river frontage, views from surrounding areas and townscape.
6. There is inadequate provision for access by emergency services.
7. There is inadequate provision for the education of children in the area.
8. There is inadequate provision of public open space

Please keep me advised of all further matters relating to this proposal.

Yours faithfully,



Odile Jackson (Mrs)

Cc: Mr Nigel Pallace, Planning Director, London Borough of Hammersmith & Fulham

0/ST

(50)

Flat No. 7  
Philadelphia Court  
65 Uverdale Road  
Chelsea  
London SW10 0SN

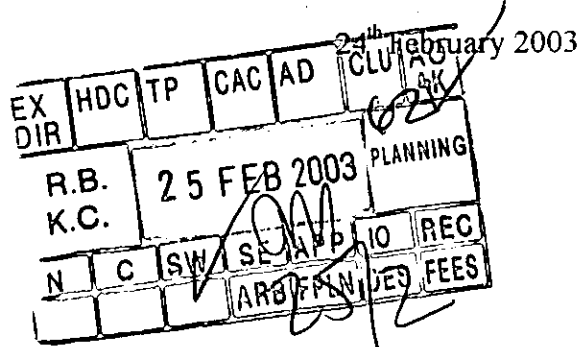
(785)

Royal Borough of Kensington & Chelsea  
Planning Department  
The Townhall  
Hornton Street  
LONDON W8 7NX

For the attention of John Thorne.

Dear Mr. Thorne,

Re: Lots Road Power Station Scheme  
Ref. No. PP/02/1324&1325.



I have now had a chance to examine the new plans for this scheme and visit the exhibition and would like you to know my comments on the scheme.

1) TRANSPORT INFRASTRUCTURE

This is entirely inadequate for the already highly dense population of this catchment area, the amended plans do nothing to guarantee either the building of a new WLL station or timetable/frequency of trains on the WLL.

Similarly the riverboat service is nothing more than a re-hash of the inadequate existing service, certainly it does nothing (both existing and new service) to fulfil the needs of those commuters who work in the City of London as it does not stop at either Swan Lane, London Bridge or The Tower, and in my opinion any service that does not go to Docklands every 10 minutes in the rush hour and twenty minutes in between is nothing more than a "Tourist Day Tripp boat!"

2) POPULATION DENSITY

The density of this scheme is entirely too high to be supported by the services in this catchment area, especially as now the amount of low-cost housing has been increased to 47%.

The new shopping arcades will, like the ones in Chelsea Harbour, after a few years fall into disuse and be taken up by quasi-offices/showrooms, as the market rents will be unaffordable to retailers serving the community.

If the developers wish to persuade us otherwise why can they not pre-let these units on 20 year leases to well known retailers like perhaps Waitrose, W H Smith, etc.

Cont'd...../ 2



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### 3) BUILD DESIGN QUALITY

It is obvious from looking at this scheme that our great Victorian classical power station will be overshadowed by the glass monolithic tower blocks at the entrance to Chelsea Creek. What a missed opportunity!! We could have had a Victorian design in sympathy to the Power Station, perhaps something like the OXO Tower or the Victorian watertower and pumping station on the Thames Embankment near Chelsea Bridge next to that other great Victorian building, the Lister Hospital, or even designed like a piece of Chesterfield furniture as is one office building in New York, instead what have we got – an eyesore.

The last thing we need to attract terrorist flying bombs to our area is yet more ugly tower blocks. The curtain walling effect of the continuous high rise building overlooking Chelsea Harbour is also ugly, obtrusive and cuts the local community off from the area between it and the river.

I note that £200,000 is to be spent on Chelsea Harbour Jetty. Does this mean that the original public slip way which featured on the model of the original development is going to be built? Can we even trust developers to build what they say they will?

As regards design we see no reason why both existing chimneys cannot be retained but at their original height as built and existing up to 10 years ago, it should be noted the extra height was added WITHOUT either planning consent or consultation!

Lastly I ask you not to be blinded by inducements of 47% affordable housing with all its costly social problems and give permission to a scheme which otherwise would never obtain consent, in other words I strongly object to planning permission being given and ask you to **REFUSE** it.

Yours sincerely,



Mr. R. Hejret



287

## THE CHELSEA SOCIETY

*founded by Reginald Blunt in 1927 to protect and foster the amenities of Chelsea*

[www.chelseasociety.org.uk](http://www.chelseasociety.org.uk)

**From: Terence Bendixson, Hon. Sec. Planning**  
**39 Elm Park Gardens, London SW10 9QF**  
**Tel & Fax 44 (0)20 7352 3885 t.bendixson@pobox.com**

Mr M J French, FRICS DipTP MRTPI Cert TS  
Executive Director, Planning and Conservation  
Royal Borough of Kensington and Chelsea  
Town Hall  
Hornton Street  
London W8 7NX

28 February 2003

Dear Mr French

**Lots Road Power Station Redevelopment: Circadian Ltd**  
**Ref. PP/02/01324 & 1325JT**

The Chelsea Society thanks you for your letter written on 10<sup>th</sup> January inviting observations on revised proposals for Lots Road Power Station.

The Society believes that the Council was right to reject the applicants' earlier scheme, to which we objected in our letter dated 30 July 2002. Although that rejection has led to welcome changes, such as the addition of a 100-place nursery and a greater provision of affordable homes, we still have serious objections. Our main concerns are:

- Over development given the lack of high capacity public transport.
- Overshadowing and overlooking by a 25 storey tower in Kensington & Chelsea and a 37 story tower in Hammersmith & Fulham.
- The disfigurement of much valued Thames views from the Chelsea Embankment, Albert and Battersea Bridges.
- The design of the Thames Path such that cyclists would be a hazard for pedestrians and the prospect that, on windy days, serious gusts will be deflected onto the path by the 25 story tower.

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## CONCLUSIONS

***Over development*** The revised Power Station design would, even with the proposed public transport expansion, result in over development. Given that there is only a slight prospect of a new east-west Underground line by 2020, and an even slighter chance that it will serve Lots Road, over development would best be avoided by eliminating the two towers and redesigning the scheme in the form of streets and mansion blocks 8 to 10 floors high. The UDP 'higher' density standard of 250 to 350 habitable rooms per hectare would be appropriate. (Para 5.3.13)

### ***Overshadowing and overlooking***

***Domination of local and Thames-side views*** The proposal for dealing with over development would resolve all the problems created by inappropriate towers.

***Inadequacies in the Thames Path*** The Thames Path should be designed primarily for the comfort, safety and delight of people on foot. This will involve creating shifts in direction, dramatic changes between narrow passages and open squares and the framing of views. Such an approach would have the added benefit of requiring cyclists to go slowly and cautiously. A high speed cycle route should be created in the roadway along Lots Road and through Chelsea Harbour.

The problem of wind gusts on the path would be resolved by redesign the towers as mansion blocks.

## NOTES

These points are set out more fully in an attached memorandum.

Given that the site in question extends from Hammersmith & Fulham into Kensington & Chelsea, given too that the 37 floor tower in Fulham, in particular, has serious implications for Chelsea, the Society urges the two Councils to take joint account against such cross boundary impacts in dealing with this application.

Yours sincerely

Terence Bendixson



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## THE CHELSEA SOCIETY

*founded by Reginald Blunt in 1927 to protect and foster the amenities of Chelsea*

[www.chelseasociety.org.uk](http://www.chelseasociety.org.uk)

**From: Terence Bendixson, Hon. Sec. Planning  
39 Elm Park Gardens, London SW10 9QF  
Tel & Fax 44 (0)20 7352 3885 t.bendixson@pobox.com**

### **SUPPORTING MEMORANDUM**

**Lots Road Power Station Redevelopment: Circadian Ltd  
Ref. PP/02/01324 & 1325JT**

**28 February 2003**

### **INTRODUCTION**

This Memorandum expands on the Society's objections to Circadian's second application for permission to redevelop Lots Road Power Station.

### **OVER DEVELOPMENT**

The Chelsea Society believes that the revised application would elad to over development. Putting so many homes on a site that is remote from public transport would lead to high levels of car use by the new residents and their visitors and lead to local congestion and a worsening of travel conditions for existing residents.

The Council's Public Transport Accessibility Index (UDP Map 11) classifies the site, amongst others, as having the poorest level of accessibility in Kensington and Chelsea.

The applicants do, of course, propose to expand bus and, if possible, West London line rail services to the site. However Colin Buchanan & Partners, in evidence for the Chelsea Harbour Residents Association, calculate that these services would have only half the capacity required. Buchanan's also note

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that the demand to be created by the Imperial Wharf development has not been taken into account and question the use by the applicants of parking spaces as a basis for their traffic generation model. They say the method is, for the purpose for which it is used, technically flawed. (Report by Colin Buchanan & Partners to Chelsea Harbour Residents Association dated 22 January 2003.)

Policy TR39 provides the Council with powers to 'resist development which would result in a) any material increase in traffic...or congestion on the roads or on public transport (and) c) unacceptable environmental consequences'. The Society believes that the power station application is covered by this policy and that its intensity should be resisted.

At 228 dwellings per hectare the proposals for the power station are very high density. Policy H12 equips the Council to resist housing designed to such densities except where necessary for townscape or conservation reasons. We can see no such reasons.

#### **OVERSHADOWING AND OVERLOOKING**

MORI polls for English Heritage show that most people (62%) do not want any more very tall buildings in London in the near future and that two thirds do not want any more residential tower blocks. (EH 'Changing London' 01 Spring 2003.) The Chelsea Society believes that such attitudes should be valued and that neither the egotism of architects nor the image-making of developers should be allowed to create unwanted buildings.

PolicyCD29 enables the Council to require development 'to be designed to ensure good light conditions for its buildings and spaces'. Power Station Plaza, the largest of the squares or spaces within the development (.04 ha), would be overshadowed by the 27 floor Chelsea tower. The plaza and some apartments in the turbine hall would be overshadowed by the 37 floor Fulham tower during winter months. Residents on the power station site, to the north of Lots Road and in Chelsea Harbour would, when near their windows or in the streets, have a feeling that they were being watched. All of this would reduce the quality of life

#### **DOMINATION OF LOCAL AND THAMES-SIDE VIEWS**

The Council's planning brief for the Power Station stated that the turbine hall should remain the dominant landmark in its vicinity. The proposed 25

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and 37 floor towers would dominate it from many riverside viewpoints. The developers have thus disregarded the brief.

Policy CD4 enables the Council to require riverside development to be 'of a height no greater than the general level...to the east of Blantyre Street. A 25 floor tower would conflict with this policy.

Policy CD 31 empowers the Council 'to resist a new high building which would significantly exceed the height of neighbouring buildings and which would harm the skyline'. This would apply to both the proposed towers and harm the skyline as seen from Chelsea Embankment, Chelsea and Battersea Bridges, Brompton Cemetery and other view points.

English Heritage officers reported to their London Advisory Committee on the first scheme that 'the current proposals would have a detrimental impact on the setting of the power station which should remain the dominant architectural and townscape focus of the area; and also on views from adjacent conservation areas and open spaces'. This applies just as much to the revised scheme.

More recently English Heritage has said: 'the overriding consideration is whether the location is suitable for a tall building in terms of its effect on the historic environment at a city-wide, as well as local level. If not, then no (tall) building will be acceptable, however good the design.' ('Changing London', 01 Spring 2003: English Heritage.) The Chelsea Society believes that Sir Terry Farrell's towers for Lots Road fail this test. Their impact on both local and more distant views is destructive.

### **INADEQUACIES IN THE THAMES PATH**

Policy CD5 aims 'To ensure the provision of a riverside walk within appropriate development'. The UDP (Paragraph 11.3.20) says 'The Council wishes to promote the opportunity for walking by the riverside as a leisure pursuit and will seek the improvement of the existing riverside walk when considering proposals for sites adjacent to the river. The Council will also encourage *separate provision for cyclists* (Chelsea Society emphasis) to be incorporated along side riverside walkways, subject to practicability and safety considerations.....

This distinction between the routing of the Countryside Commission's long distance Thames Path and the Thames Cycle Route being promoted by

SUSTRANS is important. Furthermore the Society notes that, following collisions, a bicycle barrier has been installed in the pedestrian underpass at the County Hall end of Westminster Bridge. Given that bicyclists can go at up to 20 mph (not unusual for a modern 15-gear machine) and so threaten the comfort and security of walkers, who may be elderly and frail, or accompanied by children or dogs, it is important that the Thames Path is designed to slow them down.

The Society therefore supports the Council is its policy for separate provision for pedestrians and cyclists beside the Thames and urges that:

- A route be created for cyclists along Lots Road, and
- The Thames Path be given narrowings and sharp changes of direction that would make it more dramatic and lively for pedestrians but slower and less attractive for cyclists.

The Society is also concerned about microclimatic conditions on the Thames Walk adjacent to the 27 story tower. Notwithstanding the applicants' claim that wind tunnel studies demonstrate the absence of problems, the Society knows of no tall building which does not generate severe gusts in windy weather. The solution would be to greatly reduce the height of the tower.

## CONCLUSIONS

**Over development** The revised Power Station design would, even with the proposed public transport expansion, result in over development. Given that there is only the slightest prospect of a new east-west Underground line by 2020, and even less likelihood that it will serve Lots Road, over development would best be reduced by eliminating the two towers and redesigning the scheme in the form of streets and mansion blocks 8 to 10 floors high. The UDP 'higher' density standard of 250 to 350 habitable rooms per hectare would be appropriate. (Para 5.3.13)

### *Overshadowing and overlooking*

**Domination of local and Thames-side views** The Society's proposal for dealing with over development would resolve these objections too.

293

***Inadequacies in the Thames Path*** The Thames Path should be designed for the comfort, safety and delight of people on foot. This will involve changes of direction, dramatic changes between narrow passages and open squares and the framing of interesting views. Such an approach will have the added benefit of requiring cyclists to go slowly and cautiously. A high speed cycle routes should therefore be created along Lots Road and through Chelsea Harbour.

The problem of wind gusts on the path would be resolved by redesign the towers as mansion blocks.

Hon. Sec. Planning  
The Chelsea Society, 020 7352 3885



*objection*

*AO Ach > JT*

BARBARA GRDUSZAK  
54 UVERDALE ROAD  
FLAT C  
LONDON SW10 OSS

(47)

(294)

Mr M. J. French  
Planning and Conservation  
The Town Hall  
Hornton Street  
London W8 7NX

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1<sup>st</sup> March 2003

Dear Sir,

**RE: PROPOSED DEVELOPMENT:**  
**LOTS ROAD POWER STATION**  
**LOTS ROAD SW10**

I am writing regarding the revised application for redevelopment of Lots Road Power Station.

I object to the latest proposals. They represent a significant departure from the Council's Unitary Development Plan without any reasoned justification. In particular:

1. The proposed high building is appropriate for the location. It would be harmful to the skyline and detrimental to the character and appearance of the area and to important views from neighbouring conservation areas and open spaces.
2. The height and bulk of the proposed development would result in a loss of sunlight and daylight in the area, as well in a loss of privacy. It would also add a sense of enclosure to residential properties of the neighbourhood, which are all low rise.
3. The height, massing, orientation, bulk and design development mean that it not would be well integrated into the surrounding areas townscape.
4. The proposed development will be likely to result in more traffic then the existing roads can cope with, especially taking account recent and proposed development on adjoining and nearby sites. There is no transport infrastructure

to cope with the likely traffic. There is no train or Underground service. Parking (including parking for visitors and services) will be inadequate.

295

5. There will be noise and disturbance from the proposed commercial use of the development especially in the servicing and supply goods to shops and food outlets through narrow residential streets in unsociable hours.
6. There is inadequate provision for access by emergency services.
7. There is inadequate provision for the education of children in the area.
8. There is inadequate provision of public space.

Please keep me advised of all further matters relating to the proposal.

Yours faithfully



Mrs B.E. GRDUSZAK

Cc.: Mr Nigel Pallace  
Planning Director  
London Borough of Hammersmith and Fulham

55  
Olivier P. Gairard  
14 Burnaby Street  
London SW10 0PH

0/5T

296

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

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R.D. 05 MAR 2003						PLANNING	
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3<sup>rd</sup> March 2003

Dear Sir,

**PROPOSED DEVELOPMENT: LOTS ROAD POWER STATION, LOTS ROAD, SW10**

I am writing regarding the revised application for redevelopment of the Lots Road Power Station.

I object to the latest proposals. They represent a significant departure from the Council's Unitary Development Plan without and reasoned justification. In particular:

1. The proposed high building is not appropriate for the location. It would be harmful to the skyline and detrimental to the character and appearance of the area and to important views from neighbouring conservation areas and spaces.
2. The height and bulk of the proposed development would result in a loss of sunlight and daylight in the area, as well as a loss of privacy. It would also add a sense of enclosure to residential properties of the neighbourhood which are all low rise.
3. The height, massing, orientation, bulk and design of the development mean that it would not be well integrated into the surrounding area. This would be detrimental to the character and appearance of the river frontage, views from surrounding areas and townscape.
4. The proposed development will be likely to result in more traffic than the existing roads can cope with, especially taking into account recent and proposed development on adjoining and nearby sites. There is no transport infrastructure to cope with the likely traffic. There is no train or Underground service. Parking (including parking for visitors and services) will be inadequate.

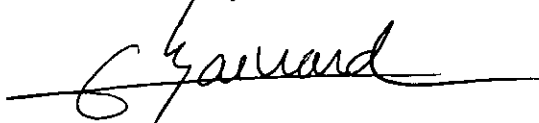
1904

5. There will be noise and disturbance from the proposed commercial use of the development especially in the servicing and supply of goods to shops and food outlets through narrow residential streets in unsociable hours.
6. There is inadequate provision for access by emergency services.
7. There is inadequate provision for for the education of children in the area.
8. There is inadequate provision for public open space.

297

Please keep me advised of all further matters relating to this proposal.

Yours faithfully



Olivier Gairard Esq.

Copy to:  
Mr Nigel Pallace  
Planning Director,  
London Borough of Hammersmith & Fulham  
The Town Hall  
King Street  
London W6 9JU

(48)

Mr. M. J. French  
Executive Director  
Planning & Conservation  
Royal Borough K & C.  
The Town Hall  
Hornton Street  
London

W8 7NX.

3rd March 2003

1323

flat 9/d

EX 107 107 277  
07 107 277  
85 OM  
15/3

Ms Grace Margolies  
44 Overdale Road  
Chelsea  
London  
SW10 0SR.

0/5 (298)

Dear Sir,

RE: Proposed Development: Lots Road Power Station, Lots Road SW10  
I am writing regarding the revised application for redevelopment  
of the Lots Road Power Station.

Firstly, I must state that I am all for developing the  
so called "backwater" of Chelsea and welcome regeneration  
of this area, but I must emphasise how strongly I feel about  
the negative effect of the revised application for redevelopment  
of the Lots Road Power Station.

I object to the latest proposals. They represent a significant  
departure from the Council's Unitary Development Plan without  
any reasoned justification. In particular: -

1. The proposed high building is not appropriate for the location. It is almost frightening! It would be extremely harmful to the skyline and detrimental to the character and appearance of the area and to important views from neighbouring conservation areas and open spaces.
2. The height and bulk of the proposed development would result in a loss of sunlight and daylight in the area, as well as a loss of privacy. My property will be directly affected by this. It would also add an acute sense of enclosure to my property and others surrounding me which are all low rise.
3. The height, massing, orientation, bulk and design of the development mean that it would not be well integrated into the surrounding area. This would be detrimental to the character and appearance of the of the river frontage, views from surrounding areas and townscape.
4. The proposed development will definitely likely to result in more traffic than the existing roads can cope with, especially taking into account recent and proposed development on adjoining and nearby sites. There is no transport infrastructure to cope with the extra traffic. There is no underground or train service. Parking will be totally inadequate. The area already suffers from overcrowded parking spaces.

299

The suggested extra bus services is totally inadequate to the amount of proposed resident and commercial plots suggested. The Royal Borough of Kensington and Chelsea will undoubtedly attract high income earners who use cars for everyday transport and not see buses as a suitable mode of transport.

Also, as a resident in the area, I strongly suggest that any extra development in the area would greatly benefit from a train / underground station at Chelsea Wharf linked to the existing line which passes through it. Even the developers must agree that it would bring a greater number of people to the area easily resulting in a higher value to the properties proposed both commercially and residentially. Without this transport service, the public will rely on driving to the area, creating gridlock and eventually deter them from returning due to the awkwardness of inefficient parking etc. Extra bus services will not provide enough efficiency to reach the amount of people they rely on enjoying the area.

5. There will be noise and disturbance from the proposed commercial use of the development especially in the servicing and supply of goods to shops and food outlets through narrow residential streets in unsociable hours. Again this problem would be

eased with cargo reaching the area via goods train which can stop at Chelsea Wharf.

6. There is inadequate provision for access by emergency services.

7. There is inadequate provision for the education of children in the area.

8. There is inadequate provision of public open space in ratio of the amount of housing planned.

Please keep me advised of all further matter relating to this proposed.

Yours faithfully,

Grace Margolies (concerned resident).

301



Simone Convert  
26 Stadium Street  
Chelsea,  
London SW10 OPT

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0/59

Mr MJ French  
Executive Officer  
Planning and Conservation  
The Royal Borough of Kensington  
and Chelsea  
Town Hall, B.  
Hornton St. C. - 5 MAR 2 1992  
London W8

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**PROPOSED DEVELOPMENT: LOTS ROAD POWER STATION SW10**

Dear Mr French,

I am writing with regards to the revised application for redevelopment of the Lots Road Power Station, which is just around the corner from me.

I strongly object to the latest proposals. They are not in line with the Council's Unitary Development Plan. I am particularly concerned about

1. The height and bulk of the proposed development, which will result in a loss of sunlight and daylight in the area, as well as a loss of privacy. It will also add a sense of enclosure to all the residential properties around here which are all low rise.
2. The height, bulk and design do not fit in with the surrounding area. It will ruin the character and appearance of the river frontage and views from surrounding areas and townscape
3. PARKING. It is hard enough round here as it is, and with all the new developments going on round here already can only get worse. There are no Underground services and until there is, I think that no development of any kind should go ahead.
- 4.. All of the additional traffic to serve the commercial element of the development, resulting in noise and disturbance to residents at unsociable hours.
5. There is inadequate provision for access by emergency services
6. There is inadequate provision for the education of children in the area.
7. There is inadequate provision of public open space.

1969.

**CAN YOU PLEASE KEEP ME ADVISED OF ALL FURTHER MATTERS  
RELATING TO THIS PROPOSAL**

Yours sincerely,



Simone Convert  
Cc Nigel Pallace, Planning Director, Hammersmith and Fulham.

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21 Burnaby Street  
London SW10 0PR

R.B. 11 MAR 2003 PLANNING  
K.C.

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Fax: +44 (0)20 7323 1445

Mob: 07808 589 251

e-mail: kisherwood@cps-direct.co.uk

9<sup>th</sup> March, 2003

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

**BY POST AND**

**BY FAX: 020 7361 3463**

Dear Mr. French,

**PROPOSED DEVELOPMENT: LOTS ROAD POWER STATION, LOTS ROAD, SW10  
YOUR REF: DPS /DCSW /PP/02 /1324 & 1325 /JT**

We have been staggered and appalled to have learned, just this weekend, of plans by Circadian (the developers of the above project) to hold a "**Public**" Meeting this Wednesday, 12<sup>th</sup> March, 2003.

Of particular concern is the fact that both yourself and Mr. Derek Myers are to be present at this meeting. If that is the case, given your busy schedules, one can only assume that arrangements for this meeting must have been in place for some considerable time, yet there has been no notification given to residents of the area of plans for this meeting.

This is entirely unacceptable and makes a mockery of the whole process. That the plans for the meeting have come to our attention is purely because we are officers of the Lots Road Action Group, and have been advised of this by one of our Ward Councillors. A quick phone - around in our immediate neighbourhood makes it perfectly clear that the general public in the area is not aware at all of this proposed "Public" meeting. To the best of the knowledge there has been no publicity whatsoever, either by way of leafleting, public notices, local bulletins or otherwise.

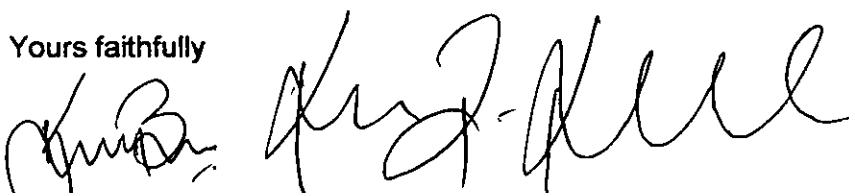
No doubt Circadian wish to be able to say that they have "consulted" with the public, under the guise of this purported "Public" meeting. The essence of a public meeting is that the public is made aware of it, and with a reasonable degree of prior notice. They have not. That officers and/or officials of the Council should participate in such a farce is, at the very least, questionable.

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It is clear that Circadian are aware of the degree of local opposition to their latest proposals, and wish to push them through the planning process with the minimum of local fuss. A properly organised public meeting, with proper public notice, should and must be held. The local populace have frankly become confused and lost in the intricacies of the whole process surrounding this application in its many reincarnations. Many people have no idea what is currently planned, and at what stage matters stand. The Lots Road Action Group did, without resources, at the time of the initial planning application, manage to hold a Public Meeting which was properly notified and hence was attended by several hundred people. That the developers, with their resources, fail to notify the public of such an important event, reeks of dubious intent.

That the Council should allow this to happen, and to participate in the procedure, is appalling. We reiterate, that what is planned by way of a "Public" meeting is entirely unacceptable, and it is shameful that the Council should treat its residents in such a manner.

Yours faithfully



**Kay De Bernardo and Kevin Isherwood**

cc. Councillor Merrick Cockell  
Mr. John Thorne (Case Officer)  
Councillor T. Ahern  
Councillor L.A. Holt  
Councillor J.R. Atkinson  
Councillor V. Borwick  
Councillor T. Buxton  
Councillor B. Campbell  
Councillor J. Corbet-Singleton  
Councillor K. Cunningham  
Councillor A. Dalton  
Councillor J. Edge  
Councillor N. Halbritter  
Councillor The Lady Hanham  
Councillor B. Hoier  
Councillor R. Horton  
Councillor J. Husband  
Councillor J. Kingsley  
Councillor B. Phelps  
Councillor S. Ritchie  
Councillor M. Simmonds  
Councillor S.H. Shapro  
Councillor D.M. Weatherhead  
Mr. Nigel Pallace, (Planning Director, London Borough of Hammersmith & Fulham)  
Mira Bar Hillal (Evening Standard)

EXHIBIT 10  
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R.B. 11 MAR 2003  
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N C SEC 10 REC

Date 12 March 2003

To

Councillor Merrick Cockell  
Leader  
Royal Borough of Kensington & Chelsea  
The Town Hall  
Hornton Street  
LONDON  
W8 7NX

Your Ref

ADL/nch/840/9.1.1

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  
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between Taylor Woodrow  
Capital Developments and  
Hutchison Whampoa  
Properties Ltd.

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Staines  
Middlesex TW18 4HF  
England

Registered Nos.  
3857131  
4005637

Dear Cllr Cockell

**LOTS ROAD**

I understand that because invitations to the Lots Road public meeting scheduled for 6.30pm today, were only received by local resident groups at the end of last week we did not give interested parties sufficient notice of the meeting.

We have therefore taken the decision to postpone the public exhibition until Wednesday 25 March 2003, at the same time and venue.

It is also our intention therefore to postpone the drop in surgery from 20 March until 3 April 2003.

I trust that you will appreciate the reasons for this change and in writing to advise you of this, I would like to take this opportunity to assure you that the next round of consultations will be undertaken in a thorough and professional manner.

Yours sincerely

**ALASDAIR J NICHOLLS**  
CHAIRMAN

cc Councillor Jenny Kingsley  
Councillor Steven Redman  
Councillor Maigred Simmonds  
Cllr Barry Phelps  
Michael French

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**Hutchison Whampoa  
Property**

The property group of  
Hutchison Whampoa Limited



**Taylor Woodrow**

**ANSTEY,  
HORNE  
& CO. Chartered Surveyors**

**Rights of Light and Party Wall Consultants**

John Thorne  
The Royal Borough of Kensington &  
Chelsea Housing & Social Services  
The Town Hall  
Hornton Street  
LONDON W8 7NX

*pc Bell  
→ JF*  
**6 Long Lane  
London  
EC1A 9HF**

**tel: 020-7606 2886  
fax: 020-7778 7090  
Founded 1795**

Our ref: LJH/LE/ROL5160/2

Your ref: DPS/DCSW/JT/PP/02/1324

*306*

12 March 2003

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Dear Mr Thorne

**Re: Lots Road Power Station**

Further to your recent instructions, I have now visited site and considered the Gordon Ingram Associates (GIA) report.

Having done so, I now write to confirm my thoughts and advice. For the moment, I do so in an informal manner, but can of course provide a formal Proof of Evidence in due course if that is considered necessary and appropriate.

**Scope of Instruction**

You instructed me on behalf of the Royal Borough of Kensington & Chelsea (RBKC) to consider the sunlight and daylight report (Environmental Statement, Appendix K2) prepared by Gordon Ingram Associates on behalf of Circadian with regard to the Lots Road Power Station development.

The report, dated December 2002, covers the development site as a whole, but as I understand it only part of the development falls within the boundaries of RBKC, the remainder being within the control of the Royal Borough of Hammersmith & Fulham. As agreed when we spoke on the telephone recently, my report need only cover those elements falling within RBKC's jurisdiction. It is the part referred to in the GIA report as "Site A".

At this juncture I have not been asked to undertake a detailed check of the computer generated technical analysis undertaken by GIA. To do so, would involve obtaining full details of the technical study from GIA in order to check the accuracy of their 3D modelling. That can certainly be done, especially as GIA use the same software as Anstey Horne & Co, but it would take some time and probably generate a fee of around £2,000 plus VAT in order to undertake a sufficiently detailed cross checking exercise.

Cont.

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For the time being, I can but assume that the GIA study, and thus the results confirmed in its report, are accurate.

### **Comment on General Approach**

In this respect, my observations are as follows;

1. In section 1.0 of this report, GIA states that the BRE guide provides two main methods of calculation for daylight, the first being that of Vertical Sky Component and the second being that of Average Daylight Factor. As a point of principle I do not believe that is correct for the following reasons;
  - That part of the guide dealing with the impact upon daylight to existing neighbouring properties is section 2.2 on page 4 of the guide. It refers to Vertical Sky Component as the first test to be carried out, but the second test is that of Daylight Distribution, not Average Daylight Factor.
  - This is further emphasised in the summary section and flow chart on page 7 of the guide, where again there is only reference to the Vertical Sky Component and Daylight Distribution tests in analysing whether daylighting is likely to be seriously affected.
  - Average Daylight Factor only appears in the guide in Appendix C (page 58). Average Daylight Factor is allied to the British Standard and is more particularly relevant to standards of lighting in new developments.

GIA acknowledges that it is also possible to analyse the internal daylight distribution by means of the Daylight Distribution test, but they suggest that "This method can sometimes be very misleading". Unfortunately they do not go on to explain why the Daylight Distribution test is misleading.

2. Although the Daylight Distribution test is undertaken with regard to site A (the RBKC section) and the results are included in tabulated form in Appendix 2, GIA appear to omit any Daylight Distribution contours. One of the advantages of the Daylight Distribution test is that the daylight contours generated enable one to see the pattern of daylight penetration within the affected rooms in the existing and proposed conditions.

### **Analysis of Results**

#### **VSC**

With regard to 60 to 82 Lots Road, the VSC table confirms numerous reductions exceeding the 20% benchmark recommended in the BRE guide. However, the majority of these transgressions are of a moderate nature and the largest percentage reductions are generally confined to windows/glazed doors serving hallways.

Cont.

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An additional point to note is that a number of the ground floor living rooms are lit by bay windows and GIA record individual results for each glazed facet. This could lead to technical transgressions for an individual facet despite the fact that the room lit by the bay window might remain perfectly well lit.

For Nos. 84 to 88 Lots Road GIA records improved VSC results. I think this is explained by the fact that in the area adjacent to the power station the new building will be cut back from the power station itself and be lower than the existing buildings on that corner.

The VSC tables for the Heatherley School of Fine Arts, Ashburnham Community Centre, Ashburnham Adventure Playground and Lots Road Public House confirm that most windows tested will comply with the BRE guide; there will still be a number of reductions exceeding 20%, although generally to a moderate extent only. I am slightly confused by the results for the adventure playground, where very high percentage reductions are recorded but I could not clearly identify on site what windows the figures relate to.

In my opinion, the VSC test should not be relied upon in isolation, because unfortunately it cannot take account of the size of the window being tested, the size of the room it lights or the fact that the room may be lit by more than one window. It is therefore very important to consider the results in conjunction with the earlier mentioned Daylight Distribution test. One might also run the Average Daylight Factor test, but I certainly do not believe the ADF test should replace the Daylight Distribution test.

#### Daylight Distribution

The Daylight Distribution table at the back of Appendix 2 is headed "No-Skyline Analysis" and confirms with regard to Nos. 60 to 82 Lots Road inclusive, that while in general there will be very moderate reductions in the existing daylit areas above ground floor level, at ground floor level itself there will be a number of reductions exceeding 20%. For Nos. 60 to 70 Lots Road the figures exceeding 20% relate to hallways rather than the living rooms, but for Nos. 72 to 82 every living room will suffer a reduction in the existing daylit area by more than 20%, ranging between 26% and 32%.

For the same reasons as described earlier, for Nos. 84 to 88 Lots Road the internal daylit areas will improve.

The GIA table confirms that there will be no reductions exceeding 20% in respect of the other properties in Lots Road.

#### Average Daylight Factor

The ADF totals are generally very good although one or two figures for 88 Lots Road appear to fall below the ADF percentages quoted by GIA on page iii of their Appendix 1, where they refer to the British Standard. However, what they do not point out is that the ADF figures of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms are minimum values.

Cont.

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Appendix C of the BRE guide states that "These last [figures quoted above] are minimum values of Average Daylight Factor, which should be attained even if a predominantly daylight appearance is not required". I therefore question whether they are appropriate in this case where we are looking at the impact upon established residential properties on the opposite side of Lots Road and a variety of other established uses further along the street.

### Sunlight

The Annual Probable Sunlight Hours table confirms the following;

- For Nos. 60 to 68 Lots Road the results are generally very good with isolated instances where the winter sunlight figures reduce quite significantly and to below the 5% minimum recommended in the BRE guide.
- For Nos. 70 to 82 Lots Road the summer sunlight results remain excellent in the main and are generally only moderately affected, but there is a clear problem with winter sunlight where in the majority of cases there will be a significant percentage reduction and, just as importantly, the winter sunlight values in the new condition will generally be very low and below the 5% minimum recommended in the BRE guide.
- For Nos. 86 and 88 Lots Road there appears to be a mixture of losses and gains, but generally little change.
- For the remaining properties the results are generally very good, although there are a handful of winter sunlight transgressions.

The GIA tables record the existing and proposed totals together with the total loss and the percentage reduction in the combined summer and winter totals. In my opinion the tables should show the losses and percentage changes for the summer, winter and combined summer and winter totals in order to make it easier to understand quite how significant the losses will be and where they will arise.

### Conclusions

In section 4.0 "Daylight Analysis" of the GIA report, the daylight position is summarised for each property and with regard to the Lots Road houses the general conclusion appears to be that "there is therefore no issue whatsoever in connection with this property". It is clearly for you and, ultimately, the Planning Committee to decide whether that is so, but I believe the summary statement by GIA to be a little misleading. It overlooks the fact that a number of main ground floor living rooms will suffer in excess of 20% reductions in existing daylight areas. This may be because GIA clearly place greater emphasis on the ADF test than the Daylight Distribution test.

In order to understand the daylight results better, I think it would be extremely helpful if GIA were to produce Daylight Distribution plans so that the contours of daylight in the existing and proposed conditions can be clearly seen. I see no reason why that cannot easily be done and I think it will assist you greatly.

Cont.



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Section 5.0 of the GIA report deals with "Sunlight Analysis" and one would certainly get the impression that there will be little or no impact upon sunlight. I think it is true to say that summer sunlight levels will generally remain very good, but this section of the GIA report perhaps understates the impact upon winter sunlight to certain of the Lots Road houses.

My preliminary conclusion is that in order to be fully comprehensive their report should be expanded to include the relevant contours generated by the Daylight Distribution test and more comprehensive sunlight tables so that the percentage change in the summer, winter and combined summer and winter figures can be more clearly identified.

I think it is fair to say that in the main the affected properties will still retain reasonable levels of light, but the impact and the technical transgressions of the BRE guide are perhaps a little understated in the current GIA report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lance J Harris', with a stylized, cursive script.

Lance J Harris

bk ur + pc ach > JT

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**Ian Creber**  
37 Tetcott Road  
London SW10 0SB  
Tel: 020 7352 5588 Fax: 020 7349 0508  
Mobile: 07880 982 013 ian@creber.org

M J French Esq  
Executive Director, Planning and Conservation  
RBK&C  
The Town Hall  
Hornton Street  
London W8 7NX

13th March 2003

Dear Sir,

**Lots Road Power Station**

I heard last night about the Secondary School to be built in Lots Road.

I'm disappointed that this has just come to light.

I refer to my attached letter to Circadian dated 2nd July 2001, and in particular the section headed My Parthian Shot. Their (verbal) reply to my concern was that they'd never heard of such a thing, and that my inferences were Out of Order.

Your Minutes of a public meeting you attended at Ashburnham Community Centre since that letter to Circadian would show that I asked you the question on the subject. The essence of your reply was that there was nothing to worry about.

I am now worried, for none the least of which reasons is that, to my knowledge, the School is being delivered fait accompli to the Lots Road area.

Please allay my fears.

Yours Faithfully,

*Ian Creber*

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**Wish List for activities that will be non-economic**

I've seen all of the video and residents' Wish List in your publications, particularly as to neighbourhood shops, "farmers market", and space for community activities.

I cannot believe that their wishes and your utterances of intentions to comply are credible. If you're serious would you publish your intended rent expectations and then proceed to test the water eg with the traders you featured in your video, and a farmers' market operator.

Could then you report back to all interested parties to inform us how many of those traders would take space in your development.

I see that you'll provide a bicycle shop "below market rent within the development". I'd like to see a list of those other traders who will be, and will not be, provided a shop at below market rents.

**The Towers**

I detest the prospect of residential buildings in the area of a height greater than those at Worlds End Estate, and / or the Belvedere at CH. I suspect when it comes down to it, the developers' main argument is ...economics. Heaven forbid.

I saw all the stuff about relative heights...and the models and drawings. I consider that all such depictions are deceiving to the eye.

I'd like to suggest a very simple way of allowing all interested parties to see for themselves the intended height of the towers.

I'd like to see a pre-arranged, and advertised helicopter flight (with selected relevant RBK&C Planner on board, if possible) at noon and /or dusk, hovering for a few minutes at the height and above the site of first the 25 storey tower, and then the 39 storey tower. It would allow all concerned - gathered on the ground - to make relative judgements for themselves. (I am aware that one of the Towers is to be built in the Borough of Hammersmith and Fulham - it doesn't change my opinion)

I think the design appearance of the Towers will be ridiculed. I don't want to live in an area subjected to perpetual ridicule.

I overheard a young woman say to her mother at the Exhibition at the weekend..."They look like erect penises, competing for a prize."

**Other concerns**

I have other concerns, involving eg wind tunnel and noise ricochet problems caused by the towers (as is the case with CH), the flight paths and flight heights of helicopters proceeding to and from the Helipad.

**Conclusion**

My greatest concern is the way in which your planners are confident that transport problems will be containable. I think you've got to go much further and soon, to prove you're right, before a Planning Permission should be even considered for the scheme.

It is my opinion that local residents should not have to suffer any more inconvenience than they already do eg Mondays in Lots Road, where C3 buses and lorries cause near gridlock probably 20 times in the day. Any day when Chelsea FC play. Local residents should be able to use their roads, park their cars, and proceed to and from the area without undue delay or inconvenience.

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- confirmation of the siting of commuter bus bays which will not congest motor vehicle traffic ie are they off-street?
  - confirmation that Smart Cards will be used on buses within the next 5 years.
  - confirmation from CH that they recognise that a public cycle path exists between CH and the Thames ie contrary to the "bikes are banned" notices
  - confirmation that the Chelsea Harbour Station will be built, and by when.
- To me this is the key to the whole development ie if no guarantees can be given, any consideration of Planning Application should be put on hold.
- confirmation, categorically, that after completion of the development the cars of Lots Road area residents will still be able to travel at least one way along the southern section of Lots Road, even if just for access.
  - confirmation that there'll be traffic lights at the eastern end of Lots Road.

### Transport

I've read the Symonds report dated June 2001.

There are too many statements worthy of discussion. I would like to meet the author, and cover numerous issues, including :

- what contingencies have been made for other than fine weather, which the report seems to assume
- does "encourage walking" really mean strangle roads so there's little alternative?
- the word "taxi" is avoided. Why?
- could I see the results of the survey in Section 4 – with Worlds End Estate taken out?
- “a smart card system will track the use of bikes”. Please explain what “track” means, and inform me one current user of smart card technology in UK
- “The development will open up access to the existing pier...”. Please confirm that the pier referred to is that at CH
- What is the action plan behind the statement “School bus services will be encouraged where these replace car trips”.
- Your Section 23 says “...because of the current uncertainty surrounding the West London Line upgrade the measures...have been designed to provide more than adequate access even if the upgrade even if the upgrade does not proceed.” So, if it is done, there'll be so much transport as to clog up the whole area?! I really think I'm being asked to have faith, though not believe.
- will you commit now that the Transport Manager will "maintain the development's web site with real time information “.
- very many of your references to “residents” are confusing to the point of being misleading – I think the paper should be re-written differentiating between the two – confusion leads to lack of belief in the propositions
- kindly explain the facts supporting your Section 31.

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### My Parthian Shot

Oh, and have you taken into account the impact on the immediate area and its residents that the building of a proposed new secondary school will have. It is widely known that the Ashburnham Community Centre and playground has been all but selected as the location of that school, with an intake of 180 students each year.

For mine, the requirement for change caused by the school alone will take the local area and community some years to absorb.

The impact of both being developed at the same time is utterly untenable.

I'm led to believe that your company knows more than a little about the plans for a new school.

### Invitation

I'm prepared to elaborate on any aspect of this letter. In the meantime you have my authority to circulate this letter to whomever you see fit.

This letter should not be taken as my comprehensive views on issues, some of which are not even mentioned here.

So much of what I've read must be written by people who've never lived in the Lots Road area. I'd like to see a little less of the "plan for tactile paving" and a little more of what services will be provided, exactly where, and when.

I detect that many issues and points are not being addressed in public – unless and until they are openly discussed with authority and certainty, I see no reason for RBK&C to rush to grant any Planning Permission.

Yours Faithfully,

  
Ian Greber

Cc Roy Thompson RBK&C

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