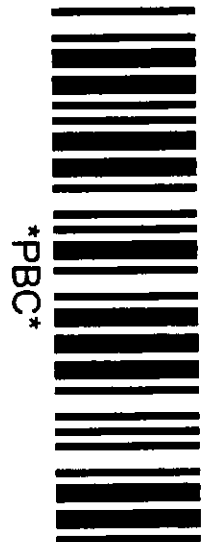


**ROYAL BOROUGH
OF
KENSINGTON & CHELSEA**

DOCUMENT SEPARATOR

DOCUMENT TYPE:

PUBLIC COMMENT



PBC

EX DIR	HDC	TP	CAC	AD	CLU	ACT AK
R.B. K.C.	- 7 NOV 2003		PLANNING			
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ARB		PLN		DES		KEES

ANN BOYD

92

Flat 8
Chelwood House
11 Embankment Gardens
London
SW3 4LL

28th October 2003

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

566

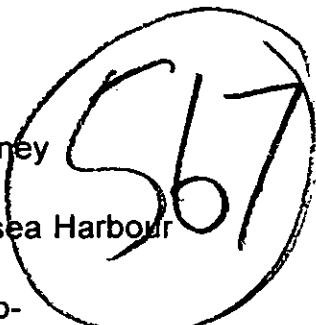
Dear Mr French

**LOTS ROAD POWER STATION DEVELOPMENT
PLANNING APPLICATION REF:**

I am writing with my comments on the planning application by Circadian for the Lots Road site. I object to the application on the following grounds:

1. Overdevelopment of the site causing adverse environmental, traffic and amenity impacts on the surrounding residential areas. The proposed density of 650 habitable rooms/hectare is nearly twice the highest recommended figure in the RBK&C UDP and the Planning Brief for the site. This is gross overdevelopment of the site and the Council should enforce the maximum density set out in those documents, unless public transport in the area is improved significantly.
2. Scale, massing and height of the proposed tower blocks is inappropriate to the locality. RBK&C should insist that the UDP and Planning Brief for the site are respected: the height should be no greater than the general level of buildings east of Blantyre Street, or 6/7 storeys, or subordinate to the height of the existing power station. I am also concerned about overlooking from the two towers and loss of daylight/ sunlight, particularly in Spring, Autumn and Winter seasons. I object to the adverse impact that the two towers will have on the surrounding area (up to 122 metres high by 40 metres wide).
3. Inadequate transport and traffic proposals: the existing transport and road systems will not be able to cope with the increase in population and commercial activity, particularly if the forthcoming developments at Imperial Wharf, King's Chelsea, Fulham Broadway and Hortensia Road are taken into account. The area is poorly-served by public transport and this must be upgraded before any high density development is permitted, including:
 - New station on the West London (OrbiRail) Line at Chelsea Harbour and
 - A firm commitment to a station on the proposed Chelsea-Hackney

ANN BOYD DESIGN LTD.

- 
- A firm commitment to a station on the proposed Chelsea-Hackney (CrossRail 2) line and
 - Frequent, high capacity, affordable river bus service from Chelsea Harbour to Westminster and Festival piers.

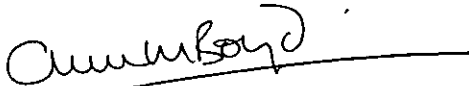
The UDP and the Draft London Plan identifies the need for high trip-generating development to be located in areas served by public transport and this development does not meet those criteria. I would expect RBK&C to limit development to the capacity of the existing public transport systems or to request a more fundamental upgrade than that offered by the developers up until now.

I am also concerned about all traffic being routed through Lots Road and the risk of parking spilling over into surrounding streets, because of the low parking provision on the site.

4. Inadequate public amenities: there is already a deficit in local amenities, including public open space, sports facilities, schools and health centres, and this development will do nothing to improve it. In particular, the proposals for public open space fall well short of the standards set out in the UDP.

I expect RBK&C to enforce the recommendations of the UDP and Planning Brief for this site, both of which have been the subject of extensive public consultation.

Yours sincerely



Ann Boyd

34 Astell Street
London SW3 3RU
1 November 2003

568

Mr. Tim Ahern
Chairman: Major Planning Applications Committee
Royal Borough of Kensington and Chelsea
The Town Hall: Hornton Street
London W8 7NX

EX DIR	HDC	TP	SAC	AD	CIL	AO
R.B.	K.C.	12 NOV 2003		PLANNING		
N	C	SW	SE	APP	IO	DEC
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Dear Mr. Ahern

Re: Lots Road Power Station Development
Planning Application Ref. DPS/DCSW/PP/02/1324 and 1325/JT

40

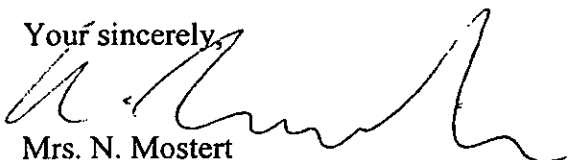
I am writing to voice my strongest objection to the planning application by Circadian for the Lots Road site. My concerns are the following:

- 1) Two 25 and 37 stories high buildings are monstrous in scope and not in keeping with the appearance of the landscape and completely inappropriate for the historic waterfront.
- 2) The proposed development contravenes the Council's own Unitary Development Plan which states clearly that no building should be more than 6 or 7 stories high along the river front.
- 3) Why is no consideration given in this planning application to green spaces along the river front, for children's playgrounds and for places where residents can enjoy the view?
- 4) The height of the twin towers will cast shadows over Chelsea in autumn and winter months and at the beginning and end of the day.
- 5) Added traffic to an already congested King's Road is unacceptable.
- 6) Why was the Royal Borough of Kensington and Chelsea not consulted before the London Borough of Hammersmith and Fulham approved the tallest of the twin towers? As this building will have dire consequences with regard to light and the appearance of the Chelsea landscape, surely such a consultation should be mandatory?
- 7) This development should be called in for a public inquire because of transport and traffic, mass height and density and its location on the historic riverfront of Chelsea and lack of open green space with light.

I cannot stress my objections strongly enough and urge you to enforce the recommendations of the UDP and Planning Brief for this site, both of which have been the subject of extensive consultation.

Yours sincerely,

Mrs. N. Mostert



4.11.03

Dear Mr. French-

JT

Thank you for your letter dated 29.10.03
regarding the proposed development at Lots
Road Power Station and Chelsea Creek, London,
SW10.

Well done! Splendid news. Please keep

everything further develop

Yours sincerely,

Frieda Hippisley-Cox

EX DIR	HDS	TR	CAC	ADT	CLU	AK
R.B.	14 NOV 2003			PLANNING		
K.C.						
N	C	SV	SE	APP	IO	REC
			ARB	FPLN	DES	FEES

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569



570

Mrs D. Halford
8 Thorndike Close
London
SW10 0ST



Planning Dept
Kensington & Chelsea Borough Council
Town Hall

Kensington

Dear Sirs,

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.	06 NOV 2003			PLANNING		27
N	C	SW	SE	APP	W	TEC
ARB			PRINDESSES			

I am not sure if I should be writing - but it is in connection with the 'Lots Road Power Station purchase and proposed building'. I understand that 2 towers of 26 floors are to be built on the site, I would protest strongly. It was said no more tower blocks should be built in this area. Purpose built for rich & poor - it would NOT work

571
In fact they would be an
eyesore. Also I live in
a semi-sheltered block of
Housing Association flats
facing the Power Station on
the side of Westfield Park. We
have a community aerial for
our Televisions and these
lower blocks are in the path
of the signals we get from
Crystal Palace.

Please consider us persons
if the proposal goes through
I would welcome hearing
from you

Yours faithfully
Don Halford

20 Limerston Street
London
Sw10 ohh

572

Dear Mr. French

Lots Road Power Station Development

Planning Application Ref; DPS\DCSW\PP\02\1324 and 1325\T

I am writing to strongly object to the 'twin tower' development, I am assuming that the council would always wish to put the wishes of its residents first, and also the good of the environment and adherence to the council's own Unitary Development Plan. This area of the Borough has an historical charm that largely rests on being low rise, like so much of Chelsea, it is plainly obvious how destructive for the community and the aesthetic these buildings would be. Has the effect of the loss of light on the totally unique Heatherley's Art School been considered, to give one small example. We beg you not to destroy another area of London's riverside, but to use this unique site to enhance the environment for residents and visitors alike. This is no place for tower blocks. We have always found the council to be reasonable in its decisions before.

Yours Sincerely

Andrew and Linda Jamieson

Andrew and Linda Jamieson.

EX	HOO	TP	OAC	AD	CLU	AO
DIA						AK
R.B.	- 7 NOV 2003					PLANNING
K.C.						
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EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.	- 7 NOV 2003			PLANNING		
N	C	SW	SE	APP	IO	REC
			ARB	IFPLN	DES	PEES

573

20 Limerston Street
London
Sw10 ohh

131

Dear Mr. Thorne

Lots Road Power Station Development

Planning Application Ref; DPS\DCSW\PP\02\1324 and 1325\T

I am writing to strongly object to the 'twin tower' development, I am assuming that the council would always wish to put the wishes of its residents first, and also the good of the environment and adherence to the council's own Unitary Development Plan. This area of the Borough has an historical charm that largely rests on being low rise, like so much of Chelsea, it is plainly obvious how destructive for the community and the aesthetic these buildings would be. Has the effect of the loss of light on the totally unique Heatherley's Art School been considered, to give one small example. We beg you not to destroy another area of London's riverside, but to use this unique site to enhance the environment for residents and visitors alike. This is no place for tower blocks. We have always found the council to be reasonable in its decisions before.

Yours Sincerely

Andrew and Linda Jamieson

Andrew and Linda Jamieson.

11 CARLYLE COURT
CHELSEA HARBOUR
LONDON SW10 0UQ

08 November 2003

J. FRENCH Esq. FRICS
Executive Director
Planning & Conservation
R.B.K. + C.

574

EX-100	TO	600	AD	010	10
PLANNING					
7 NOV 2003					
REC					
ADD. FEES					

Dear Mr. French,

Re: DPS/DCSW/PP/02/013224/JT
Lots Road Power Station etc.

When this Country needs are more people like you and the other members of your Council.

Congratulations to you all for refusing permission for the proposed development of the Lots Road Power Station.

Please continue to protect our environment from greedy developers whose only consideration is maximum profit.

Yours sincerely
Vinhal Saba
S.F. SABA (FRCM)

8a, Peterborough Villas

Bagley's Lane
London SW6 2AT

Tel No: 01494 489014
Fax No: 0207 352 1909
E-Mail: julianfbyng@talk21.com

575

Mr. Tim Ahern
Chairman
Major Planning Applications Committee
Royal Borough of Kensington & Chelsea

EX DIR	HDC	TP	CAC	AD	CLU	AO AK
R.B. K.C.		10 NOV 2006		PLANNING		
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COPY

Dear Mr Ahern
Lots Road Power Station Development
Planning Application ref: DPS/DCSW/PP/02/1324 and 1325/JT

I am writing with my comments on the planning application by Circadian for the Lots Road site. I object to the application on the following grounds:

- 1) I do not believe a twin tower development of 25 and 37 stories high is appropriate for the area in terms of density and appearance on the landscape of the historical riverside.
- 2) The height of the twin towers will cast a long shadow over Chelsea in the autumn and winter months and at the beginning and end of the day every month.
- 3) The added traffic to the Kings Road and other nearby streets caused by this development will be unacceptable.
- 4) The Lots Road Development should include areas for all Chelsea Residents to enjoy, places for children to play and green space along the riverfront for residents to enjoy the views of the Thames.
- 5) Before any development is approved, make sure the transport, medical care, education, fire and police are set up to handle the increase in residents.
- 6) The proposed development contravenes the Council's own Unitary Development Plan which states that no building should be more than 6 or 7 stories high along the riverfront.
- 7) The development should be called in for a public inquiry because of transport and traffic, mass height and density, its being located on the historic riverfront of Chelsea, and lack of open green space with light.
- 8) The London Borough of Hammersmith and Fulham have already approved the tallest of the twin towers (37 storeys). Was it not mandatory for the Royal Borough of Kensington and Chelsea Planning Committee to have discussed the effect this building on the RBK&C as it is directly adjacent to Chelsea and its 25 storey building in the same development.

I strongly urge you to enforce the recommendations of the UDP and Planning Brief for this site, both of which have been the subject of extensive consultation.

Yours sincerely,


The Hon. Julian Byng

**ISABELLA MANOS
13 REDCLIFFE PLACE
LONDON SW10 9DB**

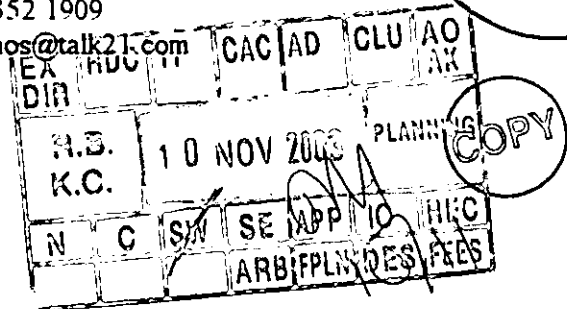
TEL: 020 7352 1999

FAX: 020 7352 1909

EMAIL: isbellamanos@talk21.com

Mr. Tim Ahern
Chairman
Major Planning Applications Committee
Royal Borough of Kensington & Chelsea

Dear Mr Ahern
Lots Road Power Station Development
Planning Application ref: DPS/DCSW/PP/02/1324 and 1325/JT



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I strongly urge you to enforce the recommendations of the UDP and Planning Brief for this site, both of which have been the subject of extensive consultation.

Yours sincerely,


Isabella Manos Palmer (Mrs)

Mr. French RBK&C

LOTS ROAD ACTION GROUP

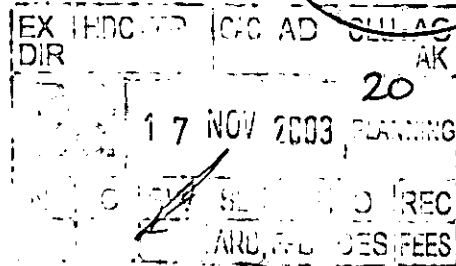
46 LOTS ROAD, LONDON SW10 0QF • Tel: 020 7793 2882 • Fax: 020 7793 2829

Mr Ian McNally
Government Office for London
9th Floor
Riverwalk House
157-161 Millbank
London SW1A 2WH

JT

577

10 November 2003



Dear Mr McNally

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
LOTS ROAD POWER STATION DEVELOPMENT
LONDON BOROUGH OF HAMMERSMITH & FULHAM
PLANNING APPLICATION REF: 2002/03132/FUL

We are writing to request that the planning application for the Lots Road Development, granted planning consent by the London Borough of Hammersmith & Fulham on 24th July 2003, should be called in under section 77 of the Town and Country Planning Act 1990 for the following reasons:

- it has significant effects beyond its immediate locality;
- it has given rise to substantial regional controversy;
- it raises significant architectural and urban design issues.

We also request that the terms of reference of a public enquiry should be linked to the related application in the Royal Borough of Kensington & Chelsea on the adjoining site (no. DPS/DCWS/PP/02/1324&1325/J 2002/1366/P & 1368/P) that was refused planning consent by RBK&C on 28th October 2003. This is because the two applications are closely inter-related in terms of their impact on the wider area and they should be regarded as a single development.

In particular, the planning consent granted by Hammersmith & Fulham has a significant impact on the residents of Kensington & Chelsea. No account of the refusal by RBK&C has been taken into account by LBH&F in arriving at its decision. This impact of this decision on the adjoining borough, especially the 37 storey tower, has caused considerable controversy locally.

Our reasons for requesting that the application should be called in are as follows:

1. Overdevelopment of the site, causing adverse environmental, traffic and amenity impacts on the surrounding residential areas.

The proposed density of 667 habitable rooms/hectare across the two sites is 2-3 times the highest recommended figure in both boroughs' UDPs and the RBK&C Planning Brief for the site. This is gross over-development of the site and the Councils should enforce the maximum density set out in those documents, unless public transport and other amenities in the area are improved to a greater degree than proposed in the draft Section 106 Agreements.

We consider that the maximum density should be linked to the Public Transport Accessibility Level, using the methodology set out in the LBH&F UDP and the Draft London Plan. This would restrict the size of development to 70% of the current proposal and a maximum density of 450 hrha, or 570 dwellings, on the assumption that the PTAL index is raised from a current level of 0-1 to 2-3. This area does not have a high level of accessibility and the PTAL has not been assessed properly by the applicant or by either borough.

578

The development does not comply with LBH&F Policy HO7 (Residential Density), Standard S1 (Plot Ratio) or Standard S2.1 (Residential Density – Permissible Range):

"The density of new residential development shall normally be not less than 173 habitable rooms per hectare (hrh) (70 habitable rooms per acre (hra)) nor more than 247 hrh (100 hra)."

...nor the approach described in Para 6.101 of LBH&F Policy HO7 that:

"encourages higher densities in areas around town centres and in other areas with high levels of accessibility."

...nor Policy H12 in the RBK&C UDP:

"To resist housing designed to very high densities unless necessary for townscape reasons to comply with the policies of the Conservation and Development Chapter."

"In applying the following policies the Council will have regard to the following well established density guidelines: VERY LOW: less than 70 habitable rooms per acre (hra) (175 habitable rooms per hectare (hrha)) LOWER: between 70 hra and 100 hra (175-250 hrha) HIGHER: between 100 hra and 140 hra (250-350 hrha) VERY HIGH: above 140 hra (350 hrha)"

2. Scale, massing and height of the proposed tower blocks is inappropriate to the locality and would affect local views

Neither borough's UDP and the RBK&C Planning Brief for the Lots Road site have been respected. The proposal does not comply with LBH&F Policy EN8 (Design of New Developments):

"All proposals must be formulated to respect: (a) the, historical context of the area and its sense of place; and (b) the scale, mass, form and grain of surrounding development; and (c) the relationship of the proposed development to the existing townscape, including the local street pattern and landmarks and the skyline and skyspace."

The proposal does not comply with LBH&F Policies EN9 (High Buildings) and EN31 (Important views along, across, and from, the River):

"A new building significantly higher than most of the surrounding buildings or in excess of 20 metres will not normally be acceptable unless it meets all the following requirements:

(i) It does not adversely affect the character of a conservation area, (ii) It does not adversely affect the character of any area from which it would be seen, including open spaces, the river or riverside. (iv) It does not affect any other important view, including that of Central London from Sawyers Hill or a local view or landmark or views from or towards the River Thames, its bridges or the riverside. (vi) It should enhance the townscape and, if located on a riverside site, be clearly justified for townscape reasons. (viii) It should be carefully related to its surroundings in accordance with policy EN8 and the Standards Chapter (Chapter 11)."

The principal reasons for refusal by RBK&C relate to similar policies, because it contravenes its UDP policy CD6:

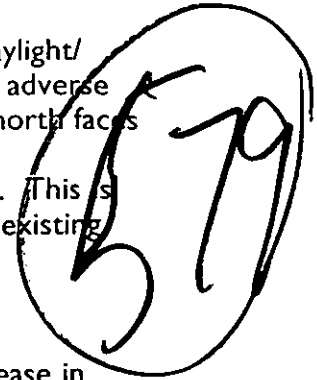
"To require any development on the riverside to preserve and enhance the waterfront character, protect or improve physical and visual links between the River and the rest of the Borough, and be of a height no greater than the general level of existing building heights to the east of Blantyre Street."

...and UDP policy CD37:

"To resist a new high building which would significantly exceed the height of neighbouring buildings and which would harm the skyline."

The LBH&F planning consent would have a severe impact on these policies and no account was taken of the RBK&C view.

We are also concerned about overlooking from the two towers and loss of daylight/sunlight, particularly in Spring, Autumn and Winter seasons. We object to the adverse impact that the two towers will have on the surrounding area: the shadowed north faces of two towers up to 122 metres high by 40 metres wide face onto the local communities as opposed to the more slender profile that faces along the river. This is contrary to LBH&F Standards S3 (Sunlight and daylight) and S13 (Protection of existing residential amenities) in the UDP.



3. Inadequate public transport proposals

The existing transport and road systems will not be able to cope with the increase in population and commercial activity, particularly if the forthcoming developments at Imperial Wharf, King's Chelsea, Fulham Broadway and Hortensia Road are taken into account. The area is poorly-served by public transport and this must be upgraded before any high density development is permitted, including all the following:

- New station on the West London (OrbiRail) Line at Chelsea Harbour and
- A firm commitment to a station on the proposed Chelsea-Hackney (CrossRail 2) line and
- Frequent, high capacity, affordable river bus service from Chelsea Harbour to Westminster and Festival piers.

The two UDPs and the Draft London Plan identifies the need for high trip-generating development to be located in areas served by public transport and this development does not meet those criteria, with the nearest transport hub at Fulham Broadway over 20 minutes walk from the site. Even after the proposed improvements the Public Transport Accessibility Level (PTAL) index would rise to only 2-3, whereas an index of 4-6 is required for a development of this intensity.

Density should only be permitted to rise once greater improvements have been implemented, following the Draft London Plan Policy 3C.2 (Matching development to transport capacity):

"Where existing transport capacity is not sufficient to allow for travel generated by proposed developments, and no firm plans exist for a sufficient increase in capacity to cater for this, boroughs should ensure that development proposals are appropriately phased until it is known these requirements could be met."

There are no undertakings that would ensure that this will take place to the degree required. The proposal does not comply with LBH&F Policy TN2 (Integration of transportation and land use planning):

"Development will only be permitted if, in relation to its location and scale, it is accessible by a range of means of transport. In particular:

(a) Land uses that are major generators of travel and transport demand will only be permitted to locate in the borough's town centres and near to public transport interchanges, and in locations highly accessible other than by private car; and (b) The amount of development on individual sites will be determined having regard to the level of public transport accessibility and, in the case of residential development, accessibility to an appropriate range of services and facilities, in accordance with development standards S1 and S2. TN2 Integration of Transportation and Land Use Planning"

We would therefore expect both boroughs to limit development to the capacity of the existing public transport systems, or to request a more fundamental upgrade than that offered by the developers up until now.

The objectors' traffic consultants (Colin Buchanan & Partners and Bellamy Roberts Partnership) have demonstrated that there will be insufficient public transport facilities to transport those people not travelling by car in peak periods: 14 additional buses per hour would be required, whereas only 2 are proposed. Colin Buchanan & Partners are also doubtful whether the volume of buses required could be accommodated on the local roads.

4. Adverse impact on the local road network

We are concerned about traffic generation caused by the development, which will lead to severe congestion on roads in the surrounding area:

- Parking provision of 0.82 spaces/ dwelling is very low (lower than RBKC standard of 1-1.5). Unless on-street parking is restricted, this attempt to limit traffic generation is meaningless. Residents of the scheme should not be entitled to Residents Parking permits, to limit traffic generation and overspill into the Lots area.
- Traffic generation figures are derived from proposed limited car parking levels (assuming no on-street parking) and a reduced population – the study by Colin Buchanan & Partners for Chelsea Harbour Residents Association considers this to be flawed.
- The volume of buses required to fulfil the public transport ambitions (see 3 above) could not be accommodated on the local roads without excessive congestion.
- No account has been taken of the impact of Congestion Charging that was observed in the RBK&C Survey that identified unanticipated changes as a result of the charge: on the Embankment HGV journeys up by 29%, motorbike use up by 22%, westbound flows up by 4%; on the Kings Road overall traffic is up by 9%.
- We are also concerned about all traffic being routed through Lots Road and the risk of parking spilling over into surrounding streets, because of the low parking provision on the site.
- No account of the traffic impact of the proposed Section 106 agreements relating to new schools, sports facilities and parking provision has been taken into account in the applicant's Transport Assessments, whereas the transport improvements have been. We believe that it is inconsistent for some Section 106 proposals to be included and others not.

LBH&F originally refused planning permission for near identical proposals for the following reasons:

"The proposed development is unacceptable in that it would, in conjunction with the development of adjoining sites, result in the generation of traffic over and above that which would adequately be accommodated on the existing highway network, creating adverse conditions impacting on highway safety contrary to Policy TNI3 of the Unitary Development Plan and the emerging UDP Alterations.

It is not considered that the measures indicated by the applicant to encourage greater public transport use are sufficiently robust or achievable to mitigate the increased congestion of the highway that would occur, or to demonstrate that the development would be acceptable in the light of objectives for the Borough's Air Quality Management Area"

RBK&C UDP also states in Policy TR28:

"To resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough's Road Network."

We consider that the original reasons for refusal still apply and this is confirmed by two traffic appraisals carried out by Colin Buchanan & Partners and Bellamy Roberts Partnership, which were not taken into account in the Councils' appraisals.

5. Inadequate public amenities

There is already a deficit in local amenities, including public open space and playspace, and this development will do nothing to improve it.


In particular, the proposals for public open space fall well short of the standards set out in both boroughs' UDPs and they are flawed in that they include a considerable area of enclosed space with the power station, which will not be accessible to the public at all times. This is contrary to Standards S5A and S7 in the LBH&F UDP.

We believe that the scheme contravenes the LBH&F UDP, with an unacceptable impact on residents in RBK&C, and that this scheme should be called in.

Yours sincerely,



John Pringle
Secretary, Lots Road Action Group
Direct email: john.pringle@prsarchitects.com



cc Mr Michael French

Mr Nigel Pallace

Mr Michael Portillo

Executive Director of Planning and Conservation, Royal Borough of
Kensington & Chelsea Town Hall, Hornton Street, London W8 7NX
Planning Director, London Borough of Hammersmith & Fulham,
Town Hall, King Street, London W6 9JU
MP for Kensington & Chelsea, House of Commons, London SW1A
1AA

LOTS ROAD ACTION GROUP

46 LOTS ROAD, LONDON SW10 0QF • Tel: 020 7793 2882 • Fax: 020 7793 2829

Mr John Prescott
Deputy Prime Minister
Office of the Deputy Prime Minister
26 Whitehall
London SW1 2WH

582

10 November 2003

Dear Mr Prescott

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
LOTS ROAD POWER STATION DEVELOPMENT
LONDON BOROUGH OF HAMMERSMITH & FULHAM
PLANNING APPLICATION REF: 2002/03132/FUL**

We are writing to request that the planning application for the Lots Road Development, granted planning consent by the London Borough of Hammersmith & Fulham on 24th July 2003, should be called in under section 77 of the Town and Country Planning Act 1990 for the following reasons:

- it has significant effects beyond its immediate locality;
- it has given rise to substantial regional controversy;
- it raises significant architectural and urban design issues.

We also request that the terms of reference of a public enquiry should be linked to the related application in the Royal Borough of Kensington & Chelsea on the adjoining site (no. DPS/DCWS/PP/02/1324&1325/J 2002/1366/P & 1368/P) that was refused planning consent by RBK&C on 28th October 2003. This is because the two applications are closely inter-related in terms of their impact on the wider area and they should be regarded as a single development.

In particular, the planning consent granted by Hammersmith & Fulham has a significant impact on the residents of Kensington & Chelsea. No account of the refusal by RBK&C has been taken into account by LBH&F in arriving at its decision. This impact of this decision on the adjoining borough, especially the 37 storey tower, has caused considerable controversy locally.

Our reasons for requesting that the application should be called in are as follows:

1. Overdevelopment of the site, causing adverse environmental, traffic and amenity impacts on the surrounding residential areas.

The proposed density of 667 habitable rooms/hectare across the two sites is 2-3 times the highest recommended figure in both boroughs' UDPs and the RBK&C Planning Brief for the site. This is gross over-development of the site and the Councils should enforce the maximum density set out in those documents, unless public transport and other amenities in the area are improved to a greater degree than proposed in the draft Section 106 Agreements.

We consider that the maximum density should be linked to the Public Transport Accessibility Level, using the methodology set out in the LBH&F UDP and the Draft London Plan. This would restrict the size of development to 70% of the current proposal and a maximum density of 450 hrha, or 570 dwellings, on the assumption that the PTAL index is raised from a current level of 0-1 to 2-3. This area does not have a high level of accessibility and the PTAL has not been assessed properly by the applicant or by either borough.

583

The development does not comply with LBH&F Policy HO7 (Residential Density), Standard S1 (Plot Ratio) or Standard S2.1 (Residential Density – Permissible Range):

"The density of new residential development shall normally be not less than 173 habitable rooms per hectare (hrh) (70 habitable rooms per acre (hra)) nor more than 247 hrh (100 hra)."

...nor the approach described in Para 6.101 of LBH&F Policy HO7 that:

"encourages higher densities in areas around town centres and in other areas with high levels of accessibility."

...nor Policy H12 in the RBK&C UDP:

"To resist housing designed to very high densities unless necessary for townscape reasons to comply with the policies of the Conservation and Development Chapter."

"In applying the following policies the Council will have regard to the following well established density guidelines: VERY LOW: less than 70 habitable rooms per acre (hra) (175 habitable rooms per hectare (hrha)) LOWER: between 70 hra and 100 hra (175-250 hrha) HIGHER: between 100 hra and 140 hra (250-350 hrha) VERY HIGH: above 140 hra (350 hrha)"

2. Scale, massing and height of the proposed tower blocks is inappropriate to the locality and would affect local views

Neither borough's UDP and the RBK&C Planning Brief for the Lots Road site have been respected. The proposal does not comply with LBH&F Policy EN8 (Design of New Developments):

"All proposals must be formulated to respect: (a) the, historical context of the area and its sense of place; and (b) the scale, mass, form and grain of surrounding development; and (c) the relationship of the proposed development to the existing townscape, including the local street pattern and landmarks and the skyline and skyspace."

The proposal does not comply with LBH&F Policies EN9 (High Buildings) and EN31 (Important views along, across, and from, the River):

"A new building significantly higher than most of the surrounding buildings or in excess of 20 metres will not normally be acceptable unless it meets all the following requirements:

(i) It does not adversely affect the character of a conservation area, (ii) It does not adversely affect the character of any area from which it would be seen, including open spaces, the river or riverside. (iv) It does not affect any other important view, including that of Central London from Sawyers Hill or a local view or landmark or views from or towards the River Thames, its bridges or the riverside. (vi) It should enhance the townscape and, if located on a riverside site, be clearly justified for townscape reasons. (viii) It should be carefully related to its surroundings in accordance with policy EN8 and the Standards Chapter (Chapter 11)."

The principal reasons for refusal by RBK&C relate to similar policies, because it contravenes its UDP policy CD6:

"To require any development on the riverside to preserve and enhance the waterfront character, protect or improve physical and visual links between the River and the rest of the Borough, and be of a height no greater than the general level of existing building heights to the east of Blantyre Street."

...and UDP policy CD37:

"To resist a new high building which would significantly exceed the height of neighbouring buildings and which would harm the skyline."

The LBH&F planning consent would have a severe impact on these policies and no account was taken of the RBK&C view.

We are also concerned about overlooking from the two towers and loss of daylight/sunlight, particularly in Spring, Autumn and Winter seasons. We object to the adverse impact that the two towers will have on the surrounding area: the shadowed north faces of two towers up to 122 metres high by 40 metres wide face onto the local communities as opposed to the more slender profile that faces along the river. This is contrary to LBH&F Standards S3 (Sunlight and daylight) and S13 (Protection of existing residential amenities) in the UDP.

S84

3. Inadequate public transport proposals

The existing transport and road systems will not be able to cope with the increase in population and commercial activity, particularly if the forthcoming developments at Imperial Wharf, King's Chelsea, Fulham Broadway and Hortensia Road are taken into account. The area is poorly-served by public transport and this must be upgraded before any high density development is permitted, including all the following:

- New station on the West London (OrbiRail) Line at Chelsea Harbour and
- A firm commitment to a station on the proposed Chelsea-Hackney (CrossRail 2) line and
- Frequent, high capacity, affordable river bus service from Chelsea Harbour to Westminster and Festival piers.

The two UDPs and the Draft London Plan identifies the need for high trip-generating development to be located in areas served by public transport and this development does not meet those criteria, with the nearest transport hub at Fulham Broadway over 20 minutes walk from the site. Even after the proposed improvements the Public Transport Accessibility Level (PTAL) index would rise to only 2-3, whereas an index of 4-6 is required for a development of this intensity.

Density should only be permitted to rise once greater improvements have been implemented, following the Draft London Plan Policy 3C.2 (Matching development to transport capacity):

"Where existing transport capacity is not sufficient to allow for travel generated by proposed developments, and no firm plans exist for a sufficient increase in capacity to cater for this, boroughs should ensure that development proposals are appropriately phased until it is known these requirements could be met."

There are no undertakings that would ensure that this will take place to the degree required. The proposal does not comply with LBH&F Policy TN2 (Integration of transportation and land use planning):

"Development will only be permitted if, in relation to its location and scale, it is accessible by a range of means of transport. In particular:

(a) Land uses that are major generators of travel and transport demand will only be permitted to locate in the borough's town centres and near to public transport interchanges, and in locations highly accessible other than by private car; and (b) The amount of development on individual sites will be determined having regard to the level of public transport accessibility and, in the case of residential development, accessibility to an appropriate range of services and facilities, in accordance with development standards S1 and S2. TN2 Integration of Transportation and Land Use Planning"

We would therefore expect both boroughs to limit development to the capacity of the existing public transport systems, or to request a more fundamental upgrade than that offered by the developers up until now.

The objectors' traffic consultants (Colin Buchanan & Partners and Bellamy Roberts Partnership) have demonstrated that there will be insufficient public transport facilities to transport those people not travelling by car in peak periods: 14 additional buses per hour would be required, whereas only 2 are proposed. Colin Buchanan & Partners are also doubtful whether the volume of buses required could be accommodated on the local roads.

4. Adverse impact on the local road network

We are concerned about traffic generation caused by the development, which will lead to severe congestion on roads in the surrounding area:

- Parking provision of 0.82 spaces/ dwelling is very low (lower than RBKC standard of 1-1.5). Unless on-street parking is restricted, this attempt to limit traffic generation is meaningless. Residents of the scheme should not be entitled to Residents Parking permits, to limit traffic generation and overspill into the Lots area.
- Traffic generation figures are derived from proposed limited car parking levels (assuming no on-street parking) and a reduced population – the study by Colin Buchanan & Partners for Chelsea Harbour Residents Association considers this to be flawed.
- The volume of buses required to fulfil the public transport ambitions (see 3 above) could not be accommodated on the local roads without excessive congestion.
- No account has been taken of the impact of Congestion Charging that was observed in the RBK&C Survey that identified unanticipated changes as a result of the charge: on the Embankment HGV journeys up by 29%, motorbike use up by 22%, westbound flows up by 4%; on the Kings Road overall traffic is up by 9%.
- We are also concerned about all traffic being routed through Lots Road and the risk of parking spilling over into surrounding streets, because of the low parking provision on the site.
- No account of the traffic impact of the proposed Section 106 agreements relating to new schools, sports facilities and parking provision has been taken into account in the applicant's Transport Assessments, whereas the transport improvements have been. We believe that it is inconsistent for some Section 106 proposals to be included and others not.

LBH&F originally refused planning permission for near identical proposals for the following reasons:

"The proposed development is unacceptable in that it would, in conjunction with the development of adjoining sites, result in the generation of traffic over and above that which would adequately be accommodated on the existing highway network, creating adverse conditions impacting on highway safety contrary to Policy TN13 of the Unitary Development Plan and the emerging UDP Alterations.

It is not considered that the measures indicated by the applicant to encourage greater public transport use are sufficiently robust or achievable to mitigate the increased congestion of the highway that would occur, or to demonstrate that the development would be acceptable in the light of objectives for the Borough's Air Quality Management Area"

RBK&C UDP also states in Policy TR28:

"To resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough's Road Network."

We consider that the original reasons for refusal still apply and this is confirmed by two traffic appraisals carried out by Colin Buchanan & Partners and Bellamy Roberts Partnership, which were not taken into account in the Councils' appraisals.

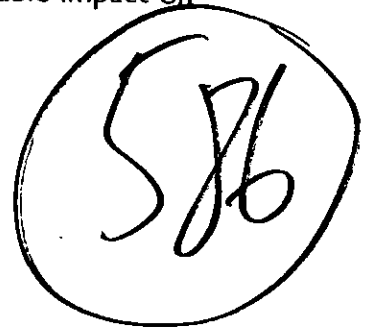
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There is already a deficit in local amenities, including public open space and playspace, and this development will do nothing to improve it.

In particular, the proposals for public open space fall well short of the standards set out in both boroughs' UDPs and they are flawed in that they include a considerable area of enclosed space with the power station, which will not be accessible to the public at all times. This is contrary to Standards S5A and S7 in the LBH&F UDP.

We believe that the scheme contravenes the LBH&F UDP, with an unacceptable impact on residents in RBK&C, and that this scheme should be called in.

Yours sincerely,



John Pringle

Secretary, Lots Road Action Group

Direct email: john.pringle@prsarchitects.com

cc Mr Michael French

Mr Nigel Pallace

Mr Michael Portillo

Executive Director of Planning and Conservation, Royal Borough of
Kensington & Chelsea Town Hall, Hornton Street, London W8 7NX
Planning Director, London Borough of Hammersmith & Fulham,
Town Hall, King Street, London W6 9JU
MP for Kensington & Chelsea, House of Commons, London SW1A
IAA

LOTS ROAD ACTION GROUP

46 LOTS ROAD, LONDON SW10 0QF • Tel: 020 7793 2882 • Fax: 020 7793 2829

Mr Ken Livingstone
Mayor of London
Greater London Authority
City Hall
The Queen's Walk
London SE1 TAA



10 November 2003

Dear Mr Livingstone

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
LOTS ROAD POWER STATION DEVELOPMENT
LONDON BOROUGH OF HAMMERSMITH & FULHAM
PLANNING APPLICATION REF: 2002/03132/FUL**

We are writing to request that the planning application for the Lots Road Development, granted planning consent by the London Borough of Hammersmith & Fulham on 24th July 2003, should be called in under section 77 of the Town and Country Planning Act 1990 for the following reasons:

- it has significant effects beyond its immediate locality;
- it has given rise to substantial regional controversy;
- it raises significant architectural and urban design issues.

We also request that the terms of reference of a public enquiry should be linked to the related application in the Royal Borough of Kensington & Chelsea on the adjoining site (no. DPS/DCWS/PP/02/1324&1325/J 2002/1366/P & 1368/P) that was refused planning consent by RBK&C on 28th October 2003. This is because the two applications are closely inter-related in terms of their impact on the wider area and they should be regarded as a single development.

In particular, the planning consent granted by Hammersmith & Fulham has a significant impact on the residents of Kensington & Chelsea. No account of the refusal by RBK&C has been taken into account by LBH&F in arriving at its decision. This impact of this decision on the adjoining borough, especially the 37 storey tower, has caused considerable controversy locally.

Our reasons for requesting that the application should be called in are as follows:

1. Overdevelopment of the site, causing adverse environmental, traffic and amenity impacts on the surrounding residential areas.

The proposed density of 667 habitable rooms/hectare across the two sites is 2-3 times the highest recommended figure in both boroughs' UDPs and the RBK&C Planning Brief for the site. This is gross over-development of the site and the Councils should enforce the maximum density set out in those documents, unless public transport and other amenities in the area are improved to a greater degree than proposed in the draft Section 106 Agreements.

We consider that the maximum density should be linked to the Public Transport Accessibility Level, using the methodology set out in the LBH&F UDP and the Draft London Plan. This would restrict the size of development to 70% of the current proposal and a maximum density of 450 hrha, or 570 dwellings, on the assumption that the PTAL index is raised from a current level of 0-1 to 2-3. This area does not have a high level of accessibility and the PTAL has not been assessed properly by the applicant or by either borough.

The development does not comply with LBH&F Policy HO7 (Residential Density), Standard S1 (Plot Ratio) or Standard S2.1 (Residential Density – Permissible Range):

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...nor the approach described in Para 6.101 of LBH&F Policy HO7 that:

"encourages higher densities in areas around town centres and in other areas with high levels of accessibility."

...nor Policy HI2 in the RBK&C UDP:

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2. Scale, massing and height of the proposed tower blocks is inappropriate to the locality and would affect local views

Neither borough's UDP and the RBK&C Planning Brief for the Lots Road site have been respected. The proposal does not comply with LBH&F Policy EN8 (Design of New Developments):

"All proposals must be formulated to respect: (a) the, historical context of the area and its sense of place; and (b) the scale, mass, form and grain of surrounding development; and (c) the relationship of the proposed development to the existing townscape, including the local street pattern and landmarks and the skyline and skyspace."

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...and UDP policy CD37:

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The LBH&F planning consent would have a severe impact on these policies and no account was taken of the RBK&C view.

589

We are also concerned about overlooking from the two towers and loss of daylight/sunlight, particularly in Spring, Autumn and Winter seasons. We object to the adverse impact that the two towers will have on the surrounding area: the shadowed north faces of two towers up to 122 metres high by 40 metres wide face onto the local communities as opposed to the more slender profile that faces along the river. This is contrary to LBH&F Standards S3 (Sunlight and daylight) and S13 (Protection of existing residential amenities) in the UDP.

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- No account has been taken of the impact of Congestion Charging that was observed in the RBK&C Survey that identified unanticipated changes as a result of the charge: on the Embankment HGV journeys up by 29%, motorbike use up by 22%, westbound flows up by 4%; on the Kings Road overall traffic is up by 9%.
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"The proposed development is unacceptable in that it would, in conjunction with the development of adjoining sites, result in the generation of traffic over and above that which would adequately be accommodated on the existing highway network, creating adverse conditions impacting on highway safety contrary to Policy TN13 of the Unitary Development Plan and the emerging UDP Alterations.

It is not considered that the measures indicated by the applicant to encourage greater public transport use are sufficiently robust or achievable to mitigate the increased congestion of the highway that would occur, or to demonstrate that the development would be acceptable in the light of objectives for the Borough's Air Quality Management Area"

RBK&C UDP also states in Policy TR28:

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There is already a deficit in local amenities, including public open space and playspace, and this development will do nothing to improve it.

In particular, the proposals for public open space fall well short of the standards set out in both boroughs' UDPs and they are flawed in that they include a considerable area of enclosed space with the power station, which will not be accessible to the public at all times. This is contrary to Standards S5A and S7 in the LBH&F UDP.

We believe that the scheme contravenes the LBH&F UDP, with an unacceptable impact on residents in RBK&C, and that this scheme should be called in.

Yours sincerely,



John Pringle
Secretary, Lots Road Action Group
Direct email: john.pringle@prsarchitects.com

cc Mr Michael French
Mr Nigel Pallace
Mr Michael Portillo

Executive Director of Planning and Conservation, Royal Borough of
Kensington & Chelsea Town Hall, Hornton Street, London W8 7NX
Planning Director, London Borough of Hammersmith & Fulham,
Town Hall, King Street, London W6 9JU
MP for Kensington & Chelsea, House of Commons, London SW1A
IAA

BY FAX 011-44-207-361-3463

592

21D Thorney Crescent
Morgan's Walk
London, SW11 3TT

November 11, 2003

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

Dear Sirs,

RE: DPS/DCSW/PP/02/01324

Further to your above referenced communication dated October 29, 2003, we note the contents and thank you for keeping us informed in this matter.

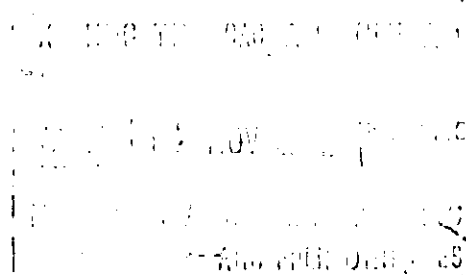
In our opinion and local knowledge the Council's decision to refuse was well informed and widely supported in the community.

As undoubtedly the applicant will either appeal or submit further and modified plans, we would, as interested parties to any proposed development to the Lot's Road Power station and Chelsea Creek, appreciate being consulted at the submittal of any appeal and/or new plans.

Yours sincerely,

Richard Watkins

Richard Watkins

for MR & MRS. WATKINS

21 Thames Quay
Chelsea Harbour
London SW10 0UY

12TH November 2003

Mr. M J French
Executive Director, Planning and Conservation
RBK & C
The Town Hall
Horton Street
London W8 9NX

Dear Sir

Re: DPS/DCSW/PP/01324&1325/JT—Proposed Development at Lots Road Power Station etc.

I thank you for your letter of the 29th October advising the Committee has refused building permission for the above application and I would like to express my appreciation to the Committee in reaching this decision, inter alia, have taken into consideration local residents' views.

Yours faithfully

T L W Evans

JT (593)

EX DIR	HDC	TP	CAC	AD	CLU	AD AK
R.B. K.C.		14 NOV 2003				PLANNING
N	C	SW	SE	APP	IO	REC
		ARB PLN DES RECS				

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S95

Inadequate Public Transport and Excessive Traffic Generation on Existing Highways

There is no adequate Public Transportation to accommodate the extra traffic created by this development. Furthermore, the supposedly independent traffic assessment was no such thing as the company who assessed it was employed by the Developer on another project (South Kensington Tube Station).

Lack of Open Space

There is very little green space and few designated places for children to play and adults to supervise them. Any river front development in a residential area should include green spaces for the people to enjoy. The proposed plan does not provide accommodation for the elderly and the minimum, affordable houses are located in the least desirable areas of the development. A ghetto would be created. Who would want to live in buildings reminiscent of the Twin Towers in New York? Who will bear the future costs of maintaining the nine planned buildings, one with twenty-five storeys and another thirty-five, with their wind-swept, shadow-ridden walkways? How are the police, fire departments, hospitals and schools going to accommodate these extra people within the existing facilities and services? The historic views along the Chelsea & Fulham river front will be ruined for ever by this gigantic development and the towers will blight the landscape for a long time to come.

I very much hope that you will be able to help with this. We do not wish to have a copy of the Hong Kong development here in the Boroughs of Chelsea & Fulham.

Kind regards,

cc: Mayor Ken Livingstone
Mr Ian McNally
Christy Austin (Austin Interior Design)
Lots Road Action Group
Sir Ralph Halpern
Mr Mike French (Head of Planning Royal Borough of Kensington & Chelsea)
Mr Steve Moralee (Head of Planning, London Borough of Hammersmith & Fulham)

Investigative Sciences
Imperial College London
3rd Floor, Lift Bank D
Chelsea & Westminster Hospital
369 Fulham Road, London SW10 9NH
Direct line: 020-8237-2670
Fax: 020-8746-5619
e-mail: julia.polak@imperial.ac.uk
web-site: <http://www.polak-transplant.med.imperial.ac.uk>
web-site: <http://www.med.imperial.ac.uk/divisions/8/index.html>



IF YOU OBJECT, YOU MUST WRITE IMMEDIATELY TO:

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

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

**SAMPLE
LETTER**

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 represents 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 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 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 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.
5. There will be noise and disturbance from the proposed commercial use of the developme 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 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

T. J. PEARCE

LAST CHANCE

TO

HAVE YOUR SAY

ABOUT THE LATEST PLANS
FOR THE

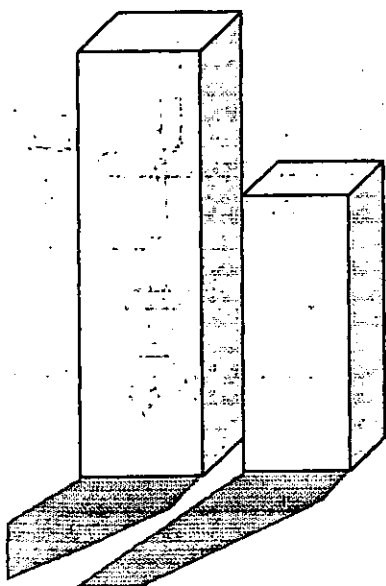
LOTS ROAD POWER STATION

REDEVELOPMENT

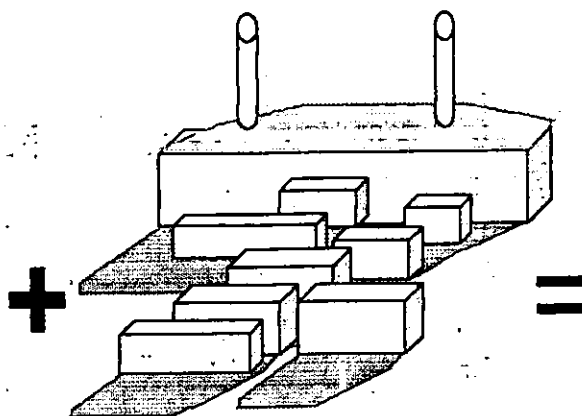
S97

THE DEVELOPERS ARE PROPOSING:

Two Towers:
37 storeys &
25 storeys



Power Station
+ Twelve New
High-Rise
Buildings



+

=

