
Planning Statement

Twickenham Station

PREPARED FOR: SOLUM REGENERATION
REF: 00025
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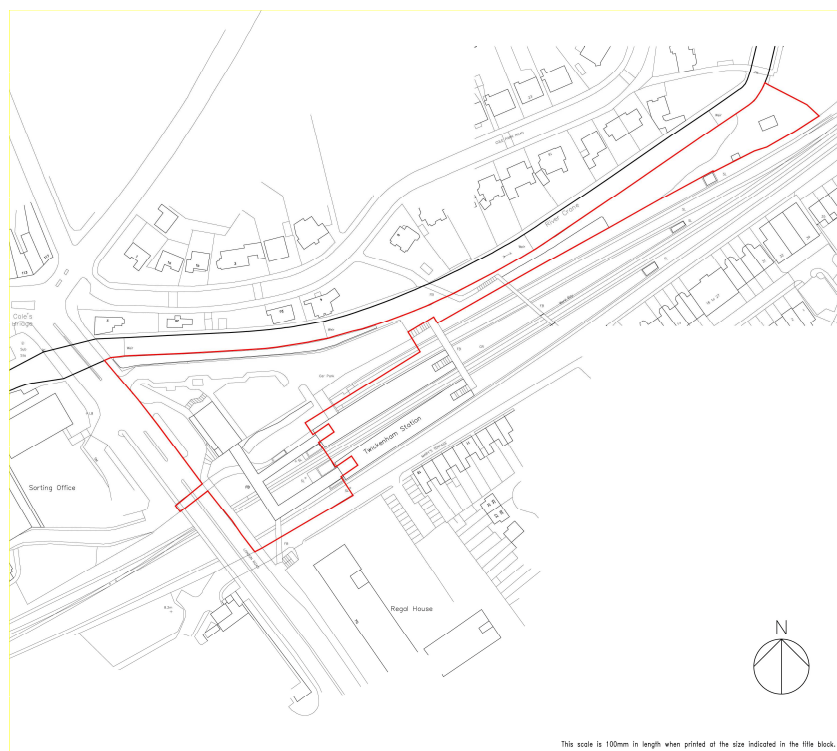
1.0 INTRODUCTION

- 1.1 This report has been prepared on behalf of Solum Regeneration, a joint venture between Network Rail and Kier Property, in support of a planning application for:

“Demolition of existing station building and access gantries to the platforms and redevelopment to provide; a podium across the existing railway lines; a new station concourse with stair and lifts to platform level; three buildings ranging in height between 7 storeys and 2 storeys comprising 115 residential units, 734 sq.m of flexible Use Class A1 (shops), A2 (Financial and Professional Services), A3 (restaurant and café) and D2 (leisure) floorspace, plant space, a combined heat and power plant, and green roofs; sustainable transport facilities to include a taxi rank, kiss and ride and car club spaces, 35 commuter car parking spaces (including disabled spaces), residents disabled spaces, delivery and servicing spaces, electric car charging points, 250 covered cycle spaces for commuters and 208 covered cycle spaces for residents; provision of a new station plaza, river walkway including children's playspace, soft and hard landscaping; and off site highway works to include the relocation of the existing bus stop”.

- 1.2 Twickenham Station is located on London Road, Twickenham. The site is bounded by London Road to the west, Mary's Terrace to the south, Cole Park Road to the north and railway lines to the east. The location and extent of the site is show on Map 1 below.

MAP 1: SITE LOCATION PLAN



1.3 The report comprises the following chapters:

- **Chapter 2: Description of Development, Application Content and Planning History** – This chapter sets out the purpose and description of development. Details on the content of the application, the associated podium planning application and the planning history is also set out. A list of the planning application documents is also provided.
- **Chapter 3: Planning Policy Review** – This chapter provides an assessment of the statutory planning policy on which the application will be determined.
- **Chapter 4: Summary and Conclusions** – This chapter provides a summary of the report and concludes that the application complies with planning policy and that planning permission should be granted for this development.

2.0 DESCRIPTION OF DEVELOPMENT, APPLICATION CONTENT AND PLANNING HISTORY

- 2.1 This chapter provides details on the background to the application, a site description, the planning history to the site and a description of the proposals. Finally, a list of the planning application documents is provided.

Background to the Development

- 2.2 Solum Regeneration is a joint venture between Network Rail and Kier Property to redevelop and regenerate station sites in and around the South East of England. Twickenham Station was identified as one of the seven initial sites for Solum Regeneration to consider.
- 2.3 Central to the proposed scheme is the improvement of the station facility and access to the platforms for all passengers including the mobility impaired. The best way to achieve this is to relocate the station building on a podium above the tracks allowing direct access from the ticket hall via stairs and lifts to the start of the platforms. The new station concourse will provide a more suitable facility befitting a town of Twickenham's status and as a venue for a major sporting facility.
- 2.4 A separate planning application was submitted in July 2010 for the introduction of a concrete podium that will span the railway lines and connect to the existing bridge on London Road. The access gantries to the platforms from the main station building will be demolished and a new temporary bridge linking the current station building to the platforms is proposed. This application is currently under consideration by the Council.
- 2.5 The reason for submitting a separate planning application for the podium was to allow Solum Regeneration to co-ordinate construction works with scheduled railway track closures in Autumn 2011.
- 2.6 A further planning application was submitted to the Council in November 2010 for the comprehensive redevelopment of the site. Following detailed discussions with the Council and other interested parties, this application has been prepared which reduces the height and massing of the all three blocks by at least one storey and revisits some of the architectural expression of the buildings. The number of residential units has been reduced from 165 to 115 as a result of omitting any affordable housing.
- 2.7 Both the November 2010 and this planning application include the podium structure. This is to ensure that the accompanying Environmental Statement tests the development impact as a whole.

Site Description

- 2.8 The application site comprises the Twickenham Station building, car park and railway lines and is bound by London Road to the west, Mary's Terrace to the south, the River Crane to the north and the railway tracks to the east. The site area is 0.96 hectares.
- 2.9 The existing station facility is deficient in a number of ways:
- An unattractive entrance to Twickenham Town Centre.

- No sense of arrival for a town of Twickenham's stature and as a location for a major sporting venue.
 - Inefficient station concourse layout.
 - Poor connectivity between the station concourse and platforms for all passengers.
 - Ineffective provision of step free access for all.
 - Platform facilities in need of revitalisation.
 - Poor connectivity from the station to the Town.
 - Car park dominates important Twickenham riverside approach.
 - Underutilised use of important town centre location.
 - Very little amenity or contribution to Twickenham town centre.
- 2.10 The houses along Mary's Terrace are locally listed as Buildings of Townscape Merit (BTM), together with a number of the properties along Cole Park Road. The adjacent 10 storey office building, Regal House is visible from Richmond Hill, a view designated on the adopted Proposals Map. The site is in Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) rating of 5.
- 2.11 The site provides a transition between the higher, more dense massing of Twickenham Town Centre and the surrounding residential area to the north.

Planning History

- 2.12 Planning permission was granted in 1984 (ref: 81/1531) for the demolition of the station building and erection of a 6 storey building with three basement floors to provide offices with 38 car parking spaces, new British Rail Station and kiosk and commuter car park for 98 cars. The construction of a public transport interchange between British Rail and London Transport buses, a riverside walk and the provision of a long term car park for 45 cars in Station Yard. This permission was never implemented.
- 2.13 There is no further planning history relating to the site beyond the recent applications submitted by Solum Regeneration for the Twickenham Station podium application in July 2010 (ref: 10/1972/FUL) and the application for comprehensive redevelopment submitted in November 2010 (ref: 10/3465/FUL).
- 2.14 Adjacent to the site, planning permission was granted through appeal in January 2010 for the *"partial demolition of first floor of Regal House and the erection of a part 2, part 3, part 6 and part 10 storey building to provide 111 guest room hotel (Use Class C1)"* (planning ref: 08/3063/FUL). The application had an Officer's recommendation for approval but was overturned at committee. Construction on the development is due to start imminently.

The Proposal

- 2.15 This planning application proposes the demolition of the existing station building and access walkways to the platforms. A podium will be constructed over the railway lines to allow for the relocation of the station concourse above the tracks. The start of the platforms is some way back from London Road bridge and this dictates the size of the podium that will be necessary to enable the lifts and stairs, that will be positioned to the rear of the station concourse, to land directly onto the platforms. This results in the station entrance being set back from London Road but allows for the creation of a new public plaza in front of the station.

- 2.16 The development comprises of three blocks ranging in height from 7 storeys from London Road adjacent to Regal House (Block B), 6 storeys fronting London Road reducing to 2 storeys as it approaches Cole Park Road (Block A). To the rear of the site a terrace of townhouse style accommodation fronts the proposed walkway along the River Crane with direct access from ground floor level with small front gardens to the lower units (Block C). Block C is 4 storeys including a 1 storey set back, reducing to 3 storeys. The development massing and density creates sufficient financial return to make the redevelopment of the station viable.
- 2.17 The elevations to the River Crane aspect of block C have been designed using a traditional form of architecture with Georgian type palette. This was selected as the preferred aesthetic in consultation with Richmond Council and has many similarities to nearby Heatham House which faces the River Crane on the opposite side of London Road bridge. The Brick used throughout the development would continue along the Block C elevation. There is a clear separation from the contemporary style of Block B & A to the traditional style of the front of Block C. This is achieved by a set back dark rendered elevation panel above the 4m wide passenger tunnel used during match days and events. This is important to clearly define the riverside approach with its own identity.
- 2.18 There are 115 residential units proposed as part of the scheme resulting in a density of 120 units per hectare. There is no affordable housing provision forming part of the proposals.

	1 Bedroom	2 Bedrooms	3 Bedrooms	Total
Private	37	66	12	115

- 2.19 The table below shows the residential habitable room mix:

	2 Habitable Rooms	3 Habitable Rooms	4 Habitable Rooms	Total
Private	74	198	48	320

- 2.20 At ground level, fronting London Road and the newly formed station plaza, six commercial units are proposed with flexible use between Use Class A1 (retail), Use Class A2 (professional and financial services), Use Class A3 (café and restaurant) and Use Class D2 (leisure) with a total floorspace of 734 sqm. It is envisaged that these units will complement the station use through the provision of a potential small convenience store, a newsagent, cafes, gym and family restaurants. At this stage the occupiers of these units are unknown.
- 2.21 The application proposes the introduction of a walkway alongside the River Crane providing a link from Moormead Park. Along this stretch of the river, new play features are proposed for young children to enjoy. The landscaping has been designed to preserve much of the existing foliage and habitat.
- 2.22 Car parking is proposed underneath Block A and part of Block B. The residential element of the scheme will be 'car-free' with 3 disabled spaces. The Train Operating Company requires the re-provision of all existing commuter spaces. The number of commuter spaces on site will be reduced from 44 to 35 (including 3 disabled spaces) with the remaining 9 spaces being re-provided on the Station Yard car park located on the other side of London Road. In addition there are 3 disabled spaces for residents and 3 car club spaces. Three of the commuter spaces will have electric charging point.

- 2.23 Cycle parking for station users will be provided on a mezzanine level above the car park accessed at grade from London Road with a connection to the station via the external stairs. There will be an increase in cycle provision from 80 spaces to 240 spaces. Separate cycle spaces for residents are proposed at the entrance to each core at the lower level amounting to 110 spaces.
- 2.24 A new taxi rank is proposed adjacent to the car park which can accommodate 3 taxis together with a 3 car kiss-and-ride facility. A time controlled taxi pick-up area is proposed on the forecourt fronting London Road for late night use. In addition, an uncovered area for 40 cycles will be located adjacent to the taxi stand.
- 2.25 The development will result in the loss of Platform 1 adjacent to the car park. This platform has been disused for a number of years and the associated track has been disconnected. Network Rail has no plans for this platform or track to be brought back into use and the associated land has been cleared for Solum Regeneration's proposed development. Platform 2 will be retained, which is predominantly disused apart from event days at the stadium when a train is parked in the station for safety reasons. This platform will be retained as part of the scheme as this will allow for the possible future introduction by Network Rail of Air Track or for increased capacity of the rail network owing to the existence of a disused railway arch under London Road that would allow for the connection of the track to create a further through line.

Consultation

- 2.26 A comprehensive consultation exercise has been undertaken with the Council, statutory consultees, interested parties and members of the public prior to the submission of this application. Set out below is a summary of the consultation:
- London Borough of Richmond – CEO and Head of Environment
 - London Borough of Richmond – Councillors
 - London Borough of Richmond – Planning Officers
 - London Borough of Richmond – Officers in relation to Environmental Impact Assessment
 - Greater London Authority
 - Transport for London
 - Commission of Architecture and the Built Environment (CABE)
 - Environment Agency
 - Public Exhibition
 - Rugby Football Union (RFU)
 - Metropolitan Police
 - British Transport Police
 - Twickenham – South West Area Emergency Services
 - South West Trains
 - Richmond upon Thames College
- 2.27 Please refer to the Statement of Community Involvement, prepared by Lexington Communications together with the Design and Access Statement prepared by Maddox & Associates for further details on the outcome of the consultation and how the comments have evolved and shaped the design.

Content of the Application

2.28 The planning application comprises the following documents as agreed with the Council prior to submission:

- Planning Application Forms, Certificate and Notices
- Planning Drawings (including drawing schedule)
- Planning Statement
- Design and Access Statement
- Sustainability Statement
- Energy Statement
- Statement of Community Involvement
- Preliminary Construction Management Statement
- Section 106 Heads of Terms
- Affordable Housing Toolkit - Executive Summary
- Environmental Statement (Volume 1): Main Chapters
 - Chapter 1: Introduction
 - Chapter 2: EIA Methodology
 - Chapter 3: Alternatives and Design Evolution
 - Chapter 4: The Proposed Development
 - Chapter 5: Planning Policy Context
 - Chapter 6: Construction Details
 - Chapter 7: Socio Economics
 - Chapter 8: Transport
 - Chapter 9: Air Quality
 - Chapter 10: Noise and Vibration
 - Chapter 11: Ground Conditions
 - Chapter 12: Water Resources
 - Chapter 13: Ecology
 - Chapter 14: Daylight, Sunlight, Overshadowing and Solar Glare
 - Chapter 15: Wind
 - Chapter 16: Electronic Interference
 - Chapter 17: Cumulative and Residual Impact
- Environmental Statement (Volume 2): Landscape and Visual Impact Assessment
- Environmental Statement (Volume 3): Technical Appendices
- Environmental Statement: Non Technical Summary

2.29 A full financial assessment of the scheme has been submitted under a separate cover for confidentiality purposes.

3.0 PLANNING POLICY REVIEW

3.1 The statutory development plan for the site comprises the following documents:

- The London Plan: Spatial Development Strategy for Greater London (consolidated with changes since 2004) adopted in February 2008.
- London Borough of Richmond Core Strategy adopted in April 2009.
- London Borough of Richmond Unitary Development Plan, First Review (saved policies) adopted in March 2005.

3.2 There are a number of other emerging documents which are relevant in differing degrees to the determination of this application:

- The London Plan: Spatial Development Strategy for Greater London, Consultation Draft is currently being considered at an Examination in Public. This document has limited weight until the Inspector's Report has been issued.
- London Borough of Richmond, Development Management Policy Development Plan Document (DPD), Pre-Submission Version was consulted on in Spring 2010. This document has limited weight as it has not been tested at Examination.
- The London Borough of Richmond, Supplementary Planning Guidance: Twickenham and Surroundings was adopted on 27 October 2010. Maddox & Associates prepared representations on behalf of Solum Regeneration to the consultation version of the SPD stating that it was not in conformity with the adopted Core Strategy (the representations can be found at Appendix 1) as required by Section 13(8) of the Town and Country (Local Development) (England) Planning Regulation 2004. The Council made minor alterations to the SPD prior to its adoption but it remains the view of Maddox & Associates that the SPD does not conform with the adopted Core Strategy. This planning statement therefore focuses on the policies set out in the Core Strategy and affords little weight to the SPD.

3.3 There is a site specific policy for Twickenham Station set out in the UDP, Policy T17, which states:

"To improve interchange facilities and provide a mix of town centre uses to take advantage of the high level of public transport accessibility and to maximise benefits to the town centre. It is recognised that there is potential for both immediate and long-term interchange improvements in association with redevelopment of the site including improved pedestrian (including bus interchange opportunities) and cycle access including cycle parking, bus interchange information systems and environmental improvements to the forecourt. To improve information systems and access for people with disabilities The site has potential for a mix of town centre uses including business, leisure and residential. Forty per cent of any residential element should be affordable housing; the remainder should be small units with no on-site parking. The site is not appropriate for significant retail uses which would draw trade from designated frontages and lead to the unacceptable elongation of the centre. Any proposal must allow for the provision of a riverside walk as part of the River Crane Walk, the reinstatement of Platform 1 and a link to the proposed pedestrian walkway to the rugby stadia. Car parking for commuters should be reduced. Proposals should take a

comprehensive approach taking into account related town centre sites, particularly the Post Office Sorting Office (T3) and the Station Yard (T23), and the contribution of the proposal toward the enhancement of the area as a whole.”

- 3.4 Policy CP9 (Twickenham Station) of the Core Strategy, part D relates to the station site and states:

“encourage higher density residential development including affordable and smaller units and car free development, in the town centre and tall buildings in the station area only.”

Land Use

- 3.5 The scheme comprises a new improved station building and transport interchange facilities with a predominantly residential development above, amounting to 115 residential units. In addition, six retail or leisure units (Use Class A1, A2, A3 or D2) are proposed fronting London Road and the new station plaza. These uses are envisaged to be complimentary to the station use and residential development above and could include a small convenience store, newsagent, cafes, gym and / or family restaurants.
- 3.6 The provision of other uses including office space, hotel and a crèche has been explored but considered either inappropriate or unviable for the site. The possible mix of uses in the commercial units does include a leisure use allowing for a gym (Use Class D2). However, it is thought the units are most likely to have an A1 or A3 use but this will be commercially led.
- 3.7 The proposed land uses are entirely consistent with the aspirations of the site specific policies UDP policy T17 and Core Strategy policy CP9 as set out above, which encourages residential development with a mix of town centre uses, without drawing trade from the designated town centre frontage.

Residential Density

- 3.8 The adopted London Plan provides appropriate densities of development depending on the location and accessibility of the site (London Plan, Table 3A.2). Twickenham Station falls into the Urban Area category with a PTAL rating of between 4 and 6. The appropriate density for the site is therefore considered to be between 200 and 700 habitable rooms per hectare, or between 70 and 260 units per hectare.
- 3.9 The emerging London Plan and Development Management DPD reflect the same density matrix. Policy CP9 of the Council’s Core Strategy also refers to encouraging higher density residential development.
- 3.10 The site is 0.96 hectares giving the scheme a residential density of 120 units per hectare or 333 habitable rooms per hectare. The residential density of the scheme sits well within the density matrix. It is therefore concluded that the residential density accords with planning policy and is appropriate for the location and accessibility of the site.

Residential Mix

- 3.11 The adopted London Plan Policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of sizes and types, taking into account the housing requirements of different groups. In support of this policy, the London Plan Supplementary Planning Guidance for Housing seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for Council's in assessing their local needs. The draft replacement London Plan Policy 3.8, seeks to widen housing choice.
- 3.12 The site specific policies both refer to the provision of small or smaller units. Policy T17 makes specific reference to small units in the private element of the scheme.
- 3.13 The residential mix proposed is set out in the table below.

	1 bedroom	2 bedrooms	3 bedrooms	Total
Private	37	66	12	115

- 3.14 The residential element of the scheme is predominantly one and two bedroom units. This reflects the adopted Council policy which encourages small units. There is no affordable housing proposed as part of this proposal due to viability issues.

Affordable Housing

- 3.15 London Plan Policy 3A.10 requires Borough Council's to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each Council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages Council's to have regards to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly taking account of individual site costs, the availability of public subsidy and other scheme requirements.
- 3.16 Policy 3A.10 is supported by paragraph 3.52, which urges Borough Council's to take account of economic viability when estimating the appropriate amount of affordable provision.
- 3.17 Site specific policy T17 in the UDP states that 40% of the residential element should be affordable. This is superseded by Core Strategy Policy CP15 which states that the Council expects 50% of all new units to be affordable, with a tenure mix of 40% housing for social rent and 10% for intermediate housing. Policy CP15 is supported by paragraph 3.3.3.7 which states that where viability is an issue in providing affordable housing, the onus will be on developers to produce a financial assessment showing the maximum amount that could be achieved on the site.

- 3.18 The scheme provides no affordable housing. This approach has been agreed with the Council and allows for the height and massing of the development to be minimised as a result. The proposal includes the provision of a new station concourse which has to be funded by the development above. A comprehensive financial assessment has been prepared by HEDC which demonstrates that no affordable housing can be delivered by the scheme. The financial assessment has been submitted under a separate cover for confidentiality purposes.

Height of the Development

- 3.19 Core Strategy Policy CP9(D) relates to Twickenham Town Centre and states *“encourage higher density residential development including affordable and small units and car free development, in the town centre and tall buildings in the station area only.”*
- 3.20 Policy CP8 (Town and Local Centres) is consistent with this by setting out under the objectives for Twickenham *“make use of potential for tall buildings in station area”*.
- 3.21 The supporting text of Policy CP7, para 8.2.1.5 defines tall buildings and states *“in general, a tall building is defined by CABE and English Heritage as one that is substantially taller than its neighbours or significantly changes the skyline. In this Borough, large scale development is defined as buildings of generally 6 or more storeys in height. A study by Turley Associates has identified those areas most suitable within the Borough for higher densities and by mapping various constraints and accessibility levels. This will be used as local guidance when determining applications”*.
- 3.22 The Sustainable Urban Development Study prepared by Turley Associates para. 5.53 states *“There is an opportunity to create a cluster around the station area which would create a landmark and aid the legibility within the local area. Any future tall buildings should not exceed generally nine storeys in height in order not to break the horizon as viewed from the Arcadian view on Richmond Hill”*.
- 3.23 The background to the adoption of the Core Strategy provides an interesting insight into the adopted version of the Core Strategy.
- 3.24 In the Submission Version of the Core Strategy, the supporting text of Policy CP7 - Maintaining and Improving the Local Environment (para 9.1.2.5) referred to the appropriateness of tall buildings in the Borough and stated:

“Large parts of the Borough are sensitive to the impact of taller buildings by virtue of the high environmental quality that currently exists, with heritage and open space constraints and their lower density character and development patterns. However, it is recognised that in some instances density can be increased, making better use of land without the need for taller buildings, through good design, layout and mix of uses. In general, a tall building is defined by CABE and English Heritage as one that is substantially taller than its neighbours or significantly changes the skyline. Large scale development is defined by the Greater London Authority as buildings of over 25m high (generally 6 storeys in height) adjacent to the River Thames or 30m high elsewhere. Since the Borough is predominantly made up of buildings of 2 to 4 storeys, buildings of 6 or more storeys will therefore be considered taller than their surroundings.”

3.25 Paragraph 9.1.2.6 continued to state:

“...taller buildings may be suitable close to Richmond and Twickenham town centres rather than other town centres, if car travel can be minimised and townscape setting left unharmed. All such proposals will require full design justification based on a comprehensive townscape appraisal and the use of 3D modelling images, and be assessed using the criteria for evaluation identified by CABE and English Heritage in ‘Guidance on Tall Buildings’ and local guidance.”

3.26 Cllr Virginia Morris submitted comprehensive representations on behalf of the London Borough of Richmond Conservative Party contesting that all areas of the Borough are sensitive to the impact of taller buildings and therefore buildings considered taller than their surroundings should be resisted with planning policy reflecting this.

3.27 Turley Associates was commissioned by the London Borough of Richmond to prepare a Sustainable Urban Development Study for the Borough with the final version dated September 2008. The purpose of the document was to identify areas in the Borough that are sensitive and therefore inappropriate, together with those with potential, for higher density development particularly taller buildings. The study concluded that there were only two areas appropriate for taller buildings in the Borough. Richmond Station which could accommodate a building of generally no more than 6 storeys, and Twickenham Station which could accommodate a building of generally no more than 9 storeys. All other areas in the Borough would be inappropriate for taller buildings.

3.28 In October 2008 the Council published their Position Papers for the Core Strategy Examination in Public. The Council proposed changes to paragraph 9.1.2.5 to include the following reference *“a study by Turley Associates has identified those areas most suitable within the borough for higher densities and tall buildings, by mapping various constraints and accessibility levels. This will be used as local guidance when determining applications”*.

3.29 The reason provided by the Council for this change was to clarify how higher densities and tall building will be dealt with in the light of the Turley Study, and to address representations submitted by Richmond Conservative Party (Section 3.0, Core Document 7a/06).

3.30 A further change was proposed by the Council in the Position Papers to Policy CP8 – Town and Local Centres. This policy included a table setting out the preferred planning approach for each of the five centres in the Borough. The Council suggested the introduction of *“Twickenham only – opportunity for tall buildings”* under the objectives section of the policy.

3.31 Following the Examination in Public, the Inspector’s Report specifically referred to the Turley Study at paragraph 6.2 which states:

*“The Sustainable Urban Development Study (CD 8/29) identifies suitable locations for high density development and tall buildings. This is a considered document and a sound evidence base informing the CS on the appropriate locations for tall buildings and high density developments. It accords with the steer given in the London Plan and with advice in the English Heritage/CABE published document “Guidance on Tall Buildings” (CD 4/05). **The Study should not be dismissed lightly.**”*

- 3.32 In the Inspector's recommendations, both changes proposed by the Council in the Position Papers were supported. Furthermore, the Inspector recommended Policy CP9 – Twickenham Town Centre to be amended "*identifying suitability of tall buildings in the station area of Twickenham*".
- 3.33 The proposed development ranges in height from 7 storeys measured from London Road in part of Block B adjacent to Regal House with Block A fronting London Road reducing from 6 storeys at its highest near Regal House, down to 2 storeys nearest to Cole Park Road.
- 3.34 The proposed height of the development has been discussed at length with the Council and is considered to be fully in accordance with adopted planning policy.

Design and Appearance

- 3.35 Core Strategy policy CP7 B (Maintaining and Improving the Local Environment) states that all new development should recognise distinctive local character and contribute to creating places of high architectural and urban design quality that are well used and valued. Proposals are required to demonstrate that they:
- are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity; and,
 - connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.
- 3.36 The Council's Unitary Development Plan has a number of relevant generic policies as set out below:
- Policy BLT11 seeks to promote a high standard of design, ensuring that schemes are compatible with the scale and character of existing development.
 - Policy BLT 2 outlines that the Council will only allow development which would contribute positively to the character, appearance and setting of the Conservations Areas or leave them unharmed.
 - Policy BLT4 states that the Council will seek to protect and encourage the preservation and enhancement of Buildings of Townscape Merit (BTM) and will use its powers where possible to protect their character and setting.
 - Policy ENV5 states that the Council will seek to protect the quality of views especially those indicated on the proposals map.
- 3.37 The stand alone nature of the site and the scale and massing of the existing Regal Housing building together with the residential area to the north, enables the transitional height and bulk of the proposed development to sit comfortably on the site. The development will provide a landmark for Twickenham Station and town centre in both close range and long views, providing a reference point for movement within the area.

- 3.38 The height of the buildings across the site steps down from the highest element adjacent to Regal House responding to the domestic properties on Cole Park Road. Block B adjacent to Regal House has a maximum height of 7 storeys sitting below Regal House by two storeys. Fronting London Road, Block A staggers down in height from 6 storeys with a two storey set back, to 2 storeys by Cole Park Road. At the rear of the site, Block C has been designed in a townhouse manner fronting the River Crane with a maximum height of 4 storeys. The top storey has also been set back to reduce the impact from ground level. Block C then reduces to 3 storeys to the rear of the site. By reason of this sympathetic step down and significant distance of 20 metres minimum between the proposed buildings and the surrounding properties, it is considered that the scheme achieves a compatible relationship with both Regal House and the domestic properties on Cole Park Road, preserving their setting as sought by Policy BLT4.
- 3.39 The elevation treatment has been developed using a traditional and simple palette of materials to reflect the surrounding area. The materials comprise a light buff coloured brick, with a contrasting dark brick. There are elements which also include aluminium cladding. The balconies have been used to provide a contemporary aspect to the building. The station has been defined by a double height glazed entrance and louvers above to celebrate and highlight the entrance from London Road.
- 3.40 A clear way-finding marker will be introduced at the front of the station plaza, close to London Road ensuring the station is easily found by members of the public.
- 3.41 All plant is located within the building. Photovoltaic panels are proposed on the tallest roofs to contribute towards the renewable energy target. The remainder of the roof space is proposed to be sustainable green space or amenity space for individual residential units.
- 3.42 With respect to Richmond Hill, the main viewpoints are centred towards the River Thames and are framed by dense vegetation. The proposed development would be seen to the right of Regal House, its roofline descending gently towards the right and largely absorbed by the tree canopy extending through the view. It would give emphasis to the centre of Twickenham in the view, but would not adversely change the visual qualities for which the view is celebrated. The change in the view would be localised, but not adverse.
- 3.43 A comprehensive landscape strategy has been prepared for the site. Fronting London Road a new hard landscaped station plaza is proposed, with trees introduced in planters to soften the area. This area provides a gathering area, enhanced by the surrounding uses including cafes and family restaurants. At the lower level there will be a shared vehicle and pedestrian area accessed by a staircase and lift, using paving to differentiate areas. This area will provide access to the car parking, kiss and ride facility and taxi rank. Fronting Block C and the River Crane there is an area of soft landscaping including a new river walkway linking to Moormead Park. Incorporated into this area is a children's play area which includes a number of landscaped element such as a maze.
- 3.44 As explained above, the entrance to the station is directly opposite London Road and will be the main focal point of the new plaza. The residential entrances to Block A and B are located off the main plaza. The entrances to Block C are focused along the river walk. All entrances are overlooked maximising the secure by design principles.

- 3.45 A comprehensive description of the development together with details on the evolution of the scheme is set out in the Design and Access Statement.
- 3.46 In summary, the proposed scheme effectively addresses the transitional nature of the site from the town centre and Regal House to the surrounding residential area through the use of scale and massing. The scheme respects the existing properties on Cole Park Road and Mary's Terrace of which there are a number of Buildings of Townscape Merit. The sympathetic palate of materials recognises the local character of Twickenham. Finally both the massing and choice of materials results in an acceptable impact from Richmond Hill. The scheme should therefore be welcomed in design terms by the Council which fulfils all the design related planning policy requirements.

Residential Amenity

- 3.47 The Mayor published an interim addition of a Housing Design Guide in July 2010. It recommends that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. The minimum recommended depth or width of all balconies and other private external spaces is 1500mm.
- 3.48 The Council's SPD on Small and Medium Housing Sites adopted in February 2006 states "*where balconies are considered they should be designed for use and not purely decoration with consideration to views, aspect and sizes*".
- 3.49 All residential units, except for one, one-bedroom units overlooking the station plaza have private amenity space in the form of either a garden, balcony or winter garden. All balconies meet the Mayor's Housing Design Guide.
- 3.50 Overall, the scheme seeks to provide all except one of the 115 residential units with private amenity space and therefore should be supported in planning terms.

Provision of Children's Playspace

- 3.51 London Plan Policy 3D.13 sets out that "*the Mayor will and the Borough's should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs*". The Mayor has published an SPD 'Providing Children and Young People's Play and Informal Recreation' in March 2008 which sets out the proposed levels of child playspace required by a development based on child yield. The Council's emerging policy supports the Mayor's approach.

- 3.51 The estimated child yield is based on a population profile method and application of LBRuT ratios for pupil yield and pupil take up. The same principle is applied in the Environmental Statement Socio Economic chapter. A play strategy is included in the Design and Access Statement together with the landscape drawings. It is demonstrated how the use of innovative design and dual-use spaces along the new River Crane walk encourages play for young children. The River Crane walk links to Moormead Park providing play space provision for older children. It is therefore considered that the scheme accords with the requirement to provide sufficient playspace for children and young people.

Affect on Neighbouring Amenity

- 3.52 Policy BLT15 of the UDP seeks to protect neighbouring properties from loss of daylight and sunlight caused by new development. With respect to light, the Council is guided by the standards set out in Site Layout, Planning for Sunlight and Daylight, and in Sun on Ground Indicators (BRE 1991).
- 3.53 With respect to light, the BRE guidance recognises the importance of light in gardens and open spaces. To ensure gardens have adequate access to sunlighting, the BRE guidance states that no more than two-fifths, and preferably no more than a quarter of outdoor amenity areas should be in shadow when calculated on the equinox (21 March). Additionally, guidance states that if light to an existing garden is already obstructed, the proposed development should not further reduce light to that garden to less than 0.8 times its former area.
- 3.54 The Council's Supplementary Planning Guidance relating to Small and Medium housing sites states that in order to ensure the privacy of occupiers is respected the windows of main facing habitable rooms should preferably be no less than 20 metres apart. Furthermore, where principal windows face a wall that contains no windows, separation distances can be reduced down to 13.5 metres.
- 3.55 Policy BLT16 ensures that no unreasonable loss of privacy and visual intrusion are experienced by adjacent residents due to built schemes.
- 3.56 BLT30 and CCE18 similarly require new development to avoid unacceptable increases in noise or pollution levels.
- 3.57 A comprehensive Daylight, Sunlight and Overshadowing Study has been carried out with the results set out in the Environmental Statement. It is concluded that the scheme is acceptable in terms of BRE Guidance.
- 3.58 In relation to distance between the proposed scheme and the existing surrounding properties, the closest habitable room windows between Block C and Cole Park Road are 25 metres. The nearest proximity of buildings mass is 20 metres. The minimum distance of 20 metres is comparable to the distance between existing properties opposite each other on Cole Park Road. The distance between Mary's Terrace and the proposed scheme is over 50 metres.
- 3.59 Detailed noise and air quality assessments have also been carried out with the findings set out in the Environmental Statement demonstrating that the development will not have a detrimental impact. Web based monitoring will be carried out throughout the construction process to ensure that the noise and air quality level are maintained at an acceptable level.

- 3.60 The scheme sensitively addresses the surrounding properties on Cole Park Road and Mary's Terrace through daylight, sunlight and overshadowing together with the proximity of development. It is demonstrated that noise and air quality impact will be also be acceptable. The scheme is therefore acceptable in planning policy and neighbourhood amenity matters.

Transport and Highways

- 3.61 Core Strategy Policy CP5 (Sustainable Travel) aims to reduce the need for travel by providing employment, shops and services at the most appropriate level locally, within the network of town centres. With respect to car parking and travel, the policy seeks to discourage commuter parking particularly by giving priority to residents' needs. Site specific policies T17 and CP9 both recognise that the Twickenham Station site should provide car-free development.
- 3.62 UDP Policy TRN2 (Transport and New Developments) states that new development, or changes of use will only be allowed where it can be demonstrated that the transport infrastructure can accommodate it, or be adapted to do so, without creating congestion and hazards on the road networks. Car and cycle parking standards are detailed in Appendix 1 of the UDP.
- 3.63 Detailed discussions have been undertaken with Transport for London and the Council regarding the transport related matters. A comprehensive Transport Assessment is submitted in support of the application.
- 3.64 The site benefits from a Public Transport Accessibility Level of 5 and is located with a Controlled Parking Zone (CPZ) which restricts parking between the hours of 8.30am and 6.30pm Monday to Saturday.
- 3.65 The residential element of the scheme is proposed to be car free with the exception of three disabled car parking spaces. It is envisaged that no car parking permits will be issued to any residents of the development, which would be secured by a Section 106 Agreement. Three car club spaces are proposed which will link into an existing local scheme.
- 3.66 The Train Operating Company (TOC) requires the re-provision of all car parking spaces. The number of car parking spaces relating to the station is reduced from 44 to 35 on the site including 3 disabled parking spaces. The remainder of the spaces are to be provided on the Station Yard site currently used as a public car park on London Road.
- 3.67 The cycle provision for station users is increased from approximately 80 spaces to 240 spaces. The cycle storage area is located on a mezzanine level above the car park accessed at grade from London Road. The residential element of the scheme will be served by at least 1 cycle space per unit. The residential cycle storage is separate to the station cycle storage provision. Each residential block has a designated secure cycle storage area close to the main stair and lift core entrance.
- 3.68 A new taxi rank and kiss-and-ride are proposed at river level. Access to the plaza and station entrance is via a set of stairs or lift to the station plaza. On event days at Twickenham Stadium this lower area has been designed to convert easily into a crowd holding area to reflect the current capacity on site. For restricted evening hours, taxis will be permitted to wait in front of the station in a lay-by area on London Road.

- 3.69 Deliveries, servicing and refuse collection will occur at the car park level within specified zones. This is demonstrated in detail within the Transport Assessment.
- 3.70 Pedestrian linkages through the site have been improved with the introduction of a river walkway linking to Moormead Park. The potential for the use of the passageway link to the Royal Mail site has been maintained. Detailed studies of the daily use of the station and the management of match day crowds have demonstrated that the link is of no benefit.
- 3.71 The scheme fully complies with the site specific planning policy requirements to provide an enhanced transport interchange through the provision of a new fit-for-purpose station concourse and access to the platforms, taxi rank, kiss-and-ride facility and relocation of bus stops. Pedestrian linkages have been improved through the site linking the town centre with Moormead Park. Cycle parking is to increase for station users from 80 spaces to 240 spaces with additional separate residents cycle parking located at the relevant core entrances. No parking on the site for residential is proposed except for 3 disabled parking spaces and 3 car club spaces. Car parking for commuters is to be reduced on site from 44 to 35 spaces. The remaining spaces are to be reallocated in the Station Yard car park. All these transport measures are fully in accordance with both adopted site specific policy requirements.

Inclusive Access

- 3.71 London Plan Policy 4B.5 requires all future development to meet the highest standards of accessibility and inclusion. Core Strategy Policy CP20 (Visitors and Tourism) requires accommodation and facilities to be accessible by all. UDP Policy BLT 12 (Accessible to All) states that all applications for the development of buildings used for employment will be required to provide full access for all users including people with disabilities and others with mobility difficulties.
- 3.72 Access from the station car park to the new station concourse and platforms has been designed to be step-free with the provision of lifts for the mobility impaired. Public access across the site is also step free to the car park, kiss and ride, taxi rank and riverside.
- 3.73 The residential units have been designed to meet the Lifetime Homes requirements where possible (as demonstrated in the Design and Access Statement) with 10% of units being either designed, or easily adaptable for wheelchair use. The residential element of the scheme is designed to be car-free. With this in mind, only 3 disabled car parking spaces are provided in an accessible location within the car park area.

Site Contamination

- 3.74 The application is accompanied by an Environmental Statement which includes a chapter on Ground Contamination. The following reports have been carried out:
- Phase 1 Ground Contamination Desk Study Report (October 2007).
 - Geotechnical Report for Twickenham Railway Station (August 2010).
 - Generic Quantitative Environmental Risk Assessment - Interpretive Environmental Report on Ground Investigation at Twickenham Railway Station (August 2010).

- 3.75 Some elevated contamination levels were found in the soils beneath the site. No elevated contaminants were found in the surface water samples taken from the River Crane. The site was found to conform to a Characteristic Situation 2, whereby precautionary ground gas measures will be required for the new development. In conclusion, the overall risk rating for the site is currently low to medium. However, with implementation of appropriate mitigation measures as part of the proposed development, this risk will be reduced to low. The Environment Agency has reviewed the information and currently raises no objection to the proposed development subject to conditions attached to the permission.

Flooding

- 3.76 The site is located in Flood Zone 1 as shown on the Environment Agency Map. This low-risk zone comprises of land assessed as having less than a 1 in 1000 annual probability of fluvial flooding in any given year. The Environment Agency has been consulted on the proposed development and currently has no objection.

Sustainability

- 3.77 The London Plan identifies Twickenham as one of London Borough of Richmond's most sustainable options for development based on its accessible location and established range of services. Core Strategy Policy CP1 (Sustainable Development) states that development will be required to conform to the Sustainable Construction checklist, including a requirement to meet the BREEAM 'excellent' rating. Additionally, Policy CP1 and the Sustainable Construction Checklist require proposals to demonstrate a reduction in carbon dioxide emissions of 20% from on site renewable energy generation. It is recognised, however, that the requirement for 20% renewable will be difficult to meet in certain schemes. It is understood from previous schemes in the Borough that the Council can apply the above measures with some degree of flexibility where appropriate and in particular recognise that increases in energy efficiency may offset (or partially offset) the renewable requirement.
- 3.78 The Sustainable Construction Checklist has been informed by the Mayor of London's Supplementary Planning Guidance on Sustainable Design and Construction and is based on national planning guidance including Planning Policy Statement (PPS) 1: Delivering Sustainable Development, PPS23: Planning and Pollution Control, PPS25: Renewable Energy, and Planning Policy Guidance (PPG) 25: Development and Flood Risk. The scheme response to each element is set out below.
- 3.79 **Environmental Rating**
A preliminary assessment has been undertaken and submitted in support of the planning application. The Code for Sustainable Homes pre-assessment score for the proposed residential elements of the development is a Code Level 4. The pre-assessment score for the proposed commercial elements of the development is BREEAM Excellent.
- 3.80 **Site Contamination**
Previously addressed in this planning statement. The Environmental Statement provides a detailed assessment of the site conditions.

- 3.81 **Site Ecology**
A full Ecology Impact Assessment has been undertaken and is presented in the Environmental Statement.
- 3.82 **Energy Saving**
An Energy Assessment has been undertaken following the London Plan hierarchy. Energy efficiency is designed into the development. Energy efficiency measures include improvements in the thermal performance of the building fabric to achieve U-Values of 20-55% and air permeability of 50%, improvement over the minimum 2006 Building Regulations requirements along with improved detailing to reduce thermal bridging, energy efficient lighting and whole house ventilation including heat recovery. Both heating and power energy will be delivered efficiently to the development through a site-wide heat distribution network and gas-fired Combined Heat and Power (CHP), which will allow connection with a future district heating network if such a scheme develops within the Twickenham area.
- 3.83 **Renewable Energy**
Due to the incorporation of a CHP system as a primary supply of space heating and hot water, the integration of renewable energy technologies are limited. The Energy Strategy details the renewable energy technology options. A photovoltaic array is proposed to reduce CO2 emissions by 3%.
- 3.84 **Construction Materials**
Where possible materials will be sourced locally. The majority of timber products shall be obtained from sustainable sources. In accordance with CfSH and BREEAM, insulation materials will not contain substances known to contribute to stratospheric ozone depletion or have the potential to contribute to global warming. Low emission finishes, construction materials, carpets and furnishings shall be used wherever practical. Recycled aggregates shall be used wherever possible.
- 3.85 **Water Saving / Recycling**
Water saving devices are to be installed throughout the development including low flush toilets, aerated shower heads and spray taps. In compliance with meeting Code Level 4 mandatory requirements, the maximum potable water consumption per person per day is no more than 105 litres and water run-off rates together with volumes post-development will be no greater than the previous conditions on site.
- 3.86 **Recycling**
The residential units will be provided with either a single 30 litre bin in an adequate internal space or at least three separate bins with a total capacity of 30 litres in an adequate internal space depending on the Council's recycling scheme requirements.
- 3.87 **Surface Water Run-Off**
The site is predominantly hard paved with an impermeable surface and positive drainage system incorporating hydrocarbon interception.

- 3.88 **Microclimate**
Detailed assessments of the wind microclimate and impacts on daylight, sunlight, overshadowing and solar glare have been undertaken as part of the Environmental Impact Assessment. The proposed development is anticipated to have a negligible impact on the microclimate both on and surrounding the site.
- 3.89 **Public Transport**
Previously addressed. The development will result in an enhanced public transport facility for Twickenham.
- 3.90 **Cycling and Walking**
Previously addressed. The cycle provision for the station users will be significantly improved and separate cycle storage for each residential Block will be provided. A new riverside walk is also proposed improving the walking accessibility in the area.
- 3.91 **Green Open Space**
A new green corridor providing a link from the station to Moormead Park is proposed providing a direct link to open space. This link will significantly improve pedestrian accessibility across the site.
- 3.92 **Secure Design**
The Scheme has been designed with consideration to the principles of Secure by Design. Consultations have been undertaken with the British Transport Police to ensure requirements are integrated into the scheme. Physical security standards as set out within the Secured by Design New Homes Checklist has been design into the scheme where necessary. In particular Physical Security measures such as passive surveillance of streets, communal spaces and parking have been incorporated into the design.
- 3.93 **Light Pollution**
Artificial lighting will be kept to a minimum on the site. Lighting proposed for security and safety reasons will use low pressure sodium lights directed to where it is needed with minimal light spillage onto the River Crane and its associated habitats.
- 3.94 **Flood Resistant Design**
The site is located in Flood Zone 1, a low-risk zone where the annual probability of flooding is less than 1 in 1000 in any given year. A Flood Risk Assessment has been undertaken as part of the Environmental Impact Assessment.
- 3.95 **Access**
Previously addressed. The scheme seeks to significantly improve the accessibility for all both in terms of the station users but also the residents of the scheme. The scheme has been designed to take into account the changes to pedestrian flows that occur on event days at Twickenham Stadium. Additionally, high quality space will be provided that offers improved access to the station platforms, preventing overcrowding and will assist in dispersing crowds quickly.

3.96 Construction Process

The disposal of all waste or other materials will be carried out in accordance with all current legislation. A Site Waste Management Plan will be produced and agreed prior to any works commencing. This will set out the steps to be taken to avoid waste production, reduce waste removal and to recycle waste. Where space on site permits, all waste will be segregated at source. All sub-contractors and suppliers will be involved in the waste minimisation process.

Planning Obligations

3.97 Set out below are the draft Heads of Terms for the planning application:

- The provision of the riverside walkway and public open space with subsequent permissive access rights.
- The implementation of a management plan to secure the maintenance of the riverside walkway and associated public open space.
- The provision of TV reception mitigation measures.
- The provision of 3 car club spaces and coordinate membership to the local car club scheme.
- The exception of residents and commercial occupiers from applying for car parking permits within the Controlled Parking Zone.
- The written submission, approval and implementation of a Travel Plan.
- The provision of a replacement bus service during possession weekends for rail users of Twickenham Station.
- Measures to improve security to the stairwell connecting Mary's Terrace and London Road.
- A pre-occupation contribution towards the provision of an necessary off-site highway works and associated sustainable transportation measure.
- A contribution towards necessary education provision.
- A contribution towards the relocation of Legible London signage and existing public sculpture.
- A contribution or obligation to provide public art.

4.0 SUMMARY AND CONCLUSIONS

- 4.1 The application proposes the comprehensive redevelopment of Twickenham Station to provide a residential led mixed-use development including a new station facility, riverside walk and associated facilities including commercial uses at ground floor and car parking. This application differs from the application submitted in November 2010 by reducing the height and massing of the scheme. This has been achieved through the removal of the affordable housing element to the scheme. Some of the architectural expression has also been revisited.
- 4.2 The scheme has been assessed against statutory development plan policy set out in the adopted London Plan, Richmond UDP and Core Strategy and has been found to be acceptable for the following reasons:
- The scheme provides a new transport interchange together with a predominantly residential scheme above. Complimentary commercial uses are located at ground floor level fronting London Road and the new station plaza including possible retail, restaurants, cafes and a gym. The land uses proposed are fully in accordance with the site specific policy requirements of UDP policy T17 and Core Strategy policy CP9.
 - The residential mix, density, and affordable housing levels further accord with policies set out in the London Plan, UDP and Core Strategy.
 - The height of the scheme is fully in accordance with adopted planning policy, specifically Core Strategy policies CP7, CP8 and CP9 together with the supporting Sustainable Urban Development Study.
 - The scheme proposes an appropriate siting, design, scale and massing of development for its location reflecting the transitional nature of the site between the town centre and the surrounding residential area whilst providing a landmark for Twickenham Station. The scheme preserves the appearance of the nearby conservation area, buildings of townscape merit located on both Mary's Terrace and Cole Park Road and the view from Richmond Hill. It is therefore considered that the scheme accords with Core Strategy policies CP7 and CP9 together with UDP policies ENV 5, BLT 2, 4 and 11.
 - The scheme has been assessed against neighbouring amenity policies BLT 15, 16, 30 and CCE18 and by reason of its appropriate and compatible scale and massing, distance to properties and gardens and orientation of balconies it is considered to be acceptable with respect to light, privacy, visual impact, noise and light pollution.
 - The scheme proposes to provide no car parking spaces for the residents, except for 3 disabled spaces and 3 car club spaces. The site is located in a controlled parking zone and the residents will not be permitted to apply for parking permits. Parking for commuters will be replaced like for like with some spaces allocated in the Station Yard car park. Deliveries would take place within the site and specific delivery areas have been allocated. Due to the accessibility of the site, together with the transport measures being fully in accordance with the site specific policy requirements set out in T17 and CP9, it is considered that the scheme is acceptable in transport policy terms CP5 and TRN2.

- The scheme does not pose any undue issues with respect to flooding and contamination and is therefore in accordance with UDP policies ENV 34 and 7.
 - The scheme will achieve Code for Sustainable Homes Level 4 and BREAAAM 'Excellent', includes the provision of a CHP with the potential for a district wide facility and provide photovoltaic's as a renewable source of energy. The scheme also responds to all other aspects of the Sustainable Construction Checklist. The scheme therefore complies with the aims and objectives of Core Strategy policy CP1.
- 4.3 On the basis of the scheme being compliant with statutory policy with no material considerations that would indicate not making a decision in accordance with the development plan (10, PPS1), it is recommended that planning permission is granted.